2. BACKGROUND AND PLANNING POLICY

This chapter of the EIAR sets out the relevant energy and climate change related policy and targets along with the strategic, regional, and local planning policies relevant to the Project. It also summarises planning & consenting history of the site, EIA scoping and consultation undertaken.

2.1 Introduction

This Chapter of the EIAR presents the policies and targets which have been put in place at the various levels of Government both national and international in relation to renewable energy and climate change that are relevant to the Project. The details below set out the need for the Project to aid Ireland in meeting its national targets and European commitments in relation to delivering renewable energy, mitigating climate change and promoting decarbonisation.

The offshore elements of the Project include 30 no. Wind Turbine Generators (WTGs) and associated foundations and substructures, an Offshore 220kV Electrical Substation (OSS) and associated foundations, inter-array cables (IAC), and an Offshore Export Cable (OEC) and Offshore Export Cable Corridor (OECC). The onshore elements include an Onshore Grid Connection (OGC) located primarily in the public road corridor, a transition joint bay (TJB) at the Onshore Landfall Location (OLL) and a 220kV Onshore Compensation Compound (OCC) at Ballymacrinan, Co. Clare. The Project will have an operational life of 38 years. The maximum export capacity (MEC) is c. 450MW. A full description of the Project is included in Chapter 5 of this EIAR.

As the Project is located partly in the outer maritime area, partly in the nearshore areas of more than one coastal planning authority, and partly on land, the legislative provisions of Chapter III of the Planning and Development Act 2000 (as amended) ("the Act") applies. A Maritime Area Consent (MAC) was granted for the purposes of the Project on the 23rd of December 2022 (2022-MAC-007); thus, the Project is eligible to apply for development permission to ABP under Section 291 of the Act. This EIAR accompanies a planning application for the Project. The planning application includes all offshore and onshore elements of the Project.

The Project comprises the provision of a 'Phase 1' offshore wind farm (previously termed a "Relevant Project" designated pursuant to the Transition Protocol for Relevant Offshore Wind Farms in 2020), which was successful in the Offshore Renewable Energy Support Scheme (ORESS) auction. It will export up to 450MW of electricity onto the national grid. It is noted that as a Phase 1 Project, it must be prioritised by ABP for assessment in line with Objective ORE Policy 2 of the National Marine Planning Framework (NMPF) and Section 15 of the Climate Action and Low Carbon Development Act (as amended).

The need to decarbonise and reduce emissions has always been imperative, however, in recent years the urgency involved has become clearer to all stakeholders. The Climate Action Plan (CAP) first published by the Government in 2019, and updated in 2021, 2023, 2024 sets out a roadmap to halve emissions by 2030 and reach net zero no later than 2050. Central to this is the set of measures set out to increase the proportion of renewable electricity to up to 80% by 2030. To reach 80% renewable electricity, CAP 21 introduced an offshore wind energy target of 5GW by 2030. The CAP places front and centre the facts that without urgent action, global warming is likely to be more than 2°C above pre-industrial levels by 2060, with *'devastating' impacts on nature and 'irreversible changes to many ecosystems'* arising.

The primary driver behind the Project is the need to provide additional renewable energy to offset the use of fossil fuels within the electricity generating sector. Increasing electricity generation from offshore wind power represents one of the most efficient and economical renewable options to reduce emissions within the power generation sector. The current proposal represents the provision of a significant wind

energy proposal and will contribute considerably towards Ireland satisfying its 2030 and 2050 renewable energy targets.

The review of relevant policy contained in this chapter of the EIAR concludes that the proposed Sceirde Rocks Offshore Wind Farm is consistent with, and strongly supported by, the overarching planning framework with regard to facilitating the move away from dependency on fossil fuels and the promotion of proper planning and sustainable development and indeed supports the achievement of the State's and the EU's renewable energy and climate objectives.

2.1.1 Renewable Energy Resources

Renewable energy resources are constantly replenished through the cycles of nature, unlike fossil fuels, which are finite resources that are becoming increasingly scarce and expensive to extract. Renewable energy resources offer sustainable alternatives to our dependency on fossil fuels as well as a means of reducing greenhouse gas emissions and opportunities to reduce our reliance on imported fuels. These resources are abundantly available in Ireland, particularly off the Irish coast, yet only a very small fraction has been harnessed so far.

A gradual shift towards increasing our use of renewable energy is no longer viable. There is an urgency now to ensure real changes takes place without delay. Renewable energy development is recognised as a vital component of Ireland's strategy to tackle the challenges of combating climate change and ensuring a secure supply of energy. Ireland is heavily dependent on the importation of fossil fuels to meet its energy need. As of 2023, over 81% of energy used in Ireland was imported from abroad[1], higher than the EU average of almost 60%[2]. This high dependency on energy imports is highly risky and Ireland is currently extremely vulnerable both in terms of meeting future energy needs and ensuring price stability. As such, expanding indigenous renewable energy supply is critical for climate action, energy security and price stability.

2.2 Climate Change Policy and Targets

International and national policy consistently identifies the need to reduce greenhouse gas (GHG) emissions and stresses the importance of reducing global warming. The context of international policy has altered over the last 30-years from being of a warning nature to the current, almost universally accepted evidenced based understanding, that there is a climate change emergency occurring both within Ireland and at a broader global scale. The Intergovernmental Panel on Climate Change (IPCC)'s Sixth Assessment Report published in 2021 provides a stark assessment of global climate change and presents evidence that climate changes will increase in all regions of the globe over the coming decades. The Synthesis Report[3] of the IPCC Sixth Assessment Report published in March 2023 summarises the state of knowledge of climate change, its widespread impacts and risks. The Synthesis Report states that *'continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and climate events and seasons'*.

The IPCC's projections are evident in extreme climate events occurring across the world. According to the World Meteorological Organisation's State of the Global Climate Report published in November 2024 report[4]:

[1] *https://www.seai.ie/publications/Energy-in-Ireland-2023.pdf*
[2] *https://www.gov.ie/pdf/?file=https://assets.gov.ie/221399/86cb99f5-58e3-4821-bc4c-e1bb1fa706fb.pdf#page=null*
[3] *https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_FullVolume.pdf*
[4] *State of the Global Climate 2024, Update for COP29 (World Meteorological Organisation, November 2024)* https://library.wmo.int/records/item/69075-state-of-the-climate-2024

- Greenhouse gases reached record observed levels in 2023. Real time data indicate that they continued to rise in 2024
- January – September 2024 global mean surface air temperature was 1.54± 0.12 °C above the pre-industrial 1850–1900 average. Boosted by El Niño, 2024 is on track to be the warmest year on record. Long term warming, measured over decades, still remains below 1.5°C
- Ocea heat content and sea level continue to rise. In 2023, the ocean absorbed around 3.1 million TWh of heat, equal to approximately 15 times the world's total energy consumption

According to the World Meteorological Organisation's State of the Global Climate Report published in March 2023[5]:

- In 2023, global mean sea level reached a record high in the satellite record (since 1993), reflecting continued ocean warming (thermal expansion) as well as the melting of glaciers and ice sheets.
- Antarctic sea-ice extent reached an absolute record low for the satellite era (since 1979) in February 2023 and remained at record low for the time of year from June till early November. The annual maximum in September was 16.96 million km², roughly 1.5 million km² below the 1991–2020 average and 1 million km² below the previous record low maximum.
- Combining the two main ice sheets (Greenland and Antarctic), the seven highest melt years on record are all since 2010, and average rates of mass loss increased from 105 Gigatonnes per year from 1992–1996 to 372 Gigatonnes per year from 2016–2020. This is equivalent to about 1 mm per year of global sea level rise attributed to the ice sheets in the latter period.

Extreme weather and climate events are having major impacts on all continents, also documented in the World Meteorological Organisation's State of the Global Climate Report:

- Flooding associated with extreme rainfall from Mediterranean Cyclone Daniel affected Greece, Bulgaria, Türkiye, and Libya with particularly heavy loss of life in Libya in September 2023.
- Tropical Cyclone Freddy in February and March 2023 was one of the world's longest-lived tropical cyclones with major impacts on Madagascar, Mozambique and Malawi. Tropical Cyclone Mocha, in May, was one of the most intense cyclones ever observed in the Bay of Bengal.
- Extreme heat affected many parts of the world. Some of the most significant were in southern Europe and North Africa, especially in the second half of July where severe and exceptionally persistent heat occurred. Temperatures in Italy reached 48.2°C, and record-high temperatures were reported in Tunis (Tunisia) 49.0°C, Agadir (Morocco) 50.4°C and Algiers (Algeria) 49.2°C.
- Canada's wildfire season was well beyond any previously recorded. The total area burned nationally as of 15 October was 18.5 million hectares, more than six times the 10-year average (2013–2022). The fires also led to severe smoke pollution, particularly in the heavily populated areas of eastern Canada and the north-eastern United States.

The IPCC's Sixth Assessment Report does not, however, conclude that a climate catastrophe is inevitable, but rather, there remains a 'narrow path' to determine the future course of climate, mainly by cutting emissions down to net zero. The Project will contribute to the decarbonisation of the energy

[5] *State of the Global Climate 2023 (World Meteorological Organisation, March 2024)* https://library.wmo.int/records/item/68835-state-of-the-global-climate-2024

sector and reduce harmful emissions. In this regard, it is in compliance with national and international climate change policy and targets.

2.2.1 International Climate Policy

United Nations Framework Convention on Climate Change

In 1992, countries joined an international treaty, the United Nations Framework Convention on Climate Change (UNFCCC), 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. The framework set no binding limits on greenhouse gas emissions for individual countries and contains no enforcement mechanisms. Instead, the framework outlines how specific international treaties (called "protocols" or "Agreements") may be negotiated to set binding limits on greenhouse gases.

Kyoto Protocol

The Kyoto Protocol operationalises the UNFCCC by committing industrialised countries and economies in transition to limit and reduce GHG emissions in accordance with agreed individual targets. Ireland is a Party to the Kyoto Protocol, which came into effect in 2005, and as a result of which, emission reduction targets agreed by developed countries are now binding.

In Doha, Qatar, on 8th December 2012, the *"Doha Amendment to the Kyoto Protocol"* was adopted. The amendment includes:

- New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from 1st January 2013 to 31st December 2020;
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the UNFCCC. Every year since 1995 (excluding 2020 due to COVID-19), the COP has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments. COP21 was organised by the United Nations and held, in Paris, from 30th November to 12th December 2015. COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the global average temperature rise to well below 2°C above pre-industrial levels and **to limit the increase to 1.5°C**. It is flexible and takes into account the needs and capacities of each country. The IPCC's 6th Assessment Report (2021) further collaborates this need to limit any increase in global average temperature to 1.5°C, stating that (underlined for emphasis),

"Humanity has emitted 2,560 billion equivalent tons of CO_2 since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.

By following a trajectory of very low GHG emissions (SSP1-1.9), the threshold of 1.5°C will be reached in the short term, between 2021 and 2040, before being very slightly exceeded (1.6°C anticipated over the period 2041-2060) then respected in the long term (1.4°C anticipated over the period 2081-2100).

"Everything is not lost, but we must pursue the Paris Agreement's most ambitious goal of limiting warming to 1.5°C."

An article published by the IPCC on the 6th October 2018 titled '*Global Warming of 1.5°C*', notes the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways; in the context of mitigation pathways, strengthening of the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. This special report is part of an invitation contained in the Decision of the 21st Conference of Parties of the United Nations Framework Convention on Climate Change to adopt the Paris Agreement and provides an update on the impact of climate change if emissions are not reduced.

COP27 Egypt

COP27 took place in Sharm el-Sheikh from the 6th of November to the 20th of November 2022. The Conference of the Parties (COP) is a supreme decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC). COP 27 centred around three major topics:

- Closing the emissions gap to keep 1.5°C alive
- Loss and Damage
- Climate Finance

The most significant outcomes from COP 27 are outlined below:

- **Phase down/out language**: The final agreement contains a commitment to a 'phase down' of coal use, as opposed to a wider commitment to phase out all fossil fuels;
- **1.5°C Pathway:** The 1.5°C warming limit has been retained and reassurances have been made that there is no room for backsliding;
- **Climate Finance & Loss and Damage**: There has been the launch of an initiative by the V20 and G7 known as the Global Shield Against Climate Risk (GSACR). The intention of this initiative has been framed almost as an insurance policy backed by the World Bank to prepare and protect those most vulnerable to climate change disasters.

COP 28 – United Arab Emirates

The 28th session of the COP to the UN Framework Convention on Climate Change, was held in Dubai from 30 November to 13 December 2023. The main objective of COP was to assess the progress made by all parties on the implementation of the 2015 Paris Agreement through the concluding phase of the 'global stocktake', which began after COP26 in 2021.

A key outcome from COP 28 was the agreement to phase out fossil fuels and increase renewable energy capacity. The agreement calls for a tripling of renewable energy capacity globally by 2030. This was the first time that the COP explicitly addressed the need to end the use of fossil fuels. The agreement was signed by the Irish government among 116 other nations. The acceleration of the permitting of renewable projects and related infrastructure is identified as a crucial enabler to achieve the renewable energy targets set out under the agreement.

COP29 – Azerbaijan

The 29th COP of the UNFCCC, (COP29), held in Baku, Azerbaijan, from November 11th 2024 to November 22nd 2024.

COP29 focused on accelerating global efforts to address climate change, in particular global efforts related to climate finance. The New Collective Quantified Goal on Climate Finance (NCQG) was agreed in the final days of COP; while developing countries advocated for at least USD 1 trillion annually by 2035, developed nations agreed to triples finance to developing countries, with commitments increasing from USD 100 billion annually to USD 300 billion annually by 2035. The NCQG has already drawn criticism for being inadequate given the global financial need of developing nations to mitigate and adapt to climate change effects and due to its lack of strong terminology in relation to the requirements of developed nations and detailed implementation strategies.

At COP29, significant progress was made in the discussions surrounding carbon markets, with nearly 200 nations agreeing on critical rules under Article 6 of the Paris Agreement. These rules aim to establish an UN-backed international carbon market. The adoption of these rules is seen as a crucial step towards operationalising a robust and credible carbon market. Despite the advances, concerns were expressed about the potential for weak governance and risks of exploitation in the system; these issues must be addressed to ensure the market's full functionality.

European Green Deal – European Climate Law (2021)

The European Green Deal, initially introduced by the European Commission in December 2019, sets out the 'blueprint' for a transformational change of the 27-country bloc from a high- to a low-carbon economy, without reducing prosperity and while improving people's quality of life, through cleaner air and water, better health and a thriving natural world. The Green Deal is intended to work through a framework of regulation and legislation setting clear overarching targets, e.g. **a bloc-wide goal of net zero carbon emissions by 2050 and a 55% cut in emissions by 2030 (compared with 1990 levels).** This is a substantial increase compared to the existing target, upwards from the previous target of at least 40% (2030 Climate & Energy Framework), and furthermore, these targets demonstrate the ambition necessary to keep the global temperature increase to well below 2°C and pursue efforts to keep it to 1.5°C as per the Paris Agreement.

With regard to the energy sector, the Green Deal focuses on 3 no. key principles for the clean energy transition, which will help reduce greenhouse gas emissions and enhance the quality of life for citizens:

- Ensuring a secure and affordable EU energy supply;
- Developing a fully integrated, interconnected and digitalised EU energy market; and
- Prioritising energy efficiency, improving the energy performance of our buildings and developing a power sector based largely on renewable sources (e.g. the Project the subject of this application).

The European Climate Law writes into law the objectives set out above in the European Green Deal for Europe's economy and society to become climate-neutral by 2050. Climate neutrality by 2050 means achieving net zero greenhouse gas emissions for EU countries as a whole, mainly by cutting emissions, investing in green technologies and protecting the natural environment. The Climate Law includes:

- A legal objective for the Union to reach climate neutrality by 2050;
- An ambitious 2030 climate target of at least 55% reduction of net emissions of greenhouse gases as compared to 1990, with clarity on the contribution of emission reductions and removals;
- A process for setting a 2040 climate target, taking into account an indicative greenhouse gas budget for 2030-2050 to be published by the Commission;
- A commitment to negative emissions after 2050;

- The establishment of European Scientific Advisory Board on Climate Change, that will provide independent scientific advice;
- Stronger provisions on adaptation to climate change; and
- Strong coherence across Union policies with the climate neutrality objective.

The law aims to ensure that all EU policies contribute to this goal and that all sectors of the economy and society play their part. All 27 no. EU Member States have committed to turning the EU into the first climate neutral continent by 2050. One third of the 1.8 trillion-euro investments from the Next Generation EU Recovery Plan, and the EU's seven-year budget, will finance the European Green Deal. On 14th July 2021, the European Commission adopted a set of proposals[5] to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.

Achieving these emission reductions in the next decade which is crucial to Europe becoming the world's first climate-neutral continent by 2050 would clearly be assisted by the Project.

2.2.1.2 Project Compliance with International Climate Policy

From the review of the relevant climate policy documents, it is clear that the Project is in compliance with international climate policy considering that the Project will aid in reducing reliance on fossil fuels for electricity generation. This will help to achieve the United Nations Framework Convention on Climate Change goals of limiting global temperatures as a result of climate change and the goals of the Kyoto protocol, the Paris Agreement and the several Conference of Parties agreements as outlined above. By making a just transition to renewable forms of electricity generation, the level of carbon emissions will drop as our reliance on non-renewable forms of energy lessen.

The Project is also considered to be in line with the European Green Deal which also aims to reduce carbon emissions and achieve net zero carbon emissions by 2050. These goals will not be met if projects, such as the Project, are not urgently consented and implemented. The construction of the Project would also aid in ensuring energy security within the EU which is a target of the European Green Deal. As wind is an indigenous and abundant resource, Ireland can tap into its vast wind potential, reducing the vulnerability to price fluctuations and geopolitical risks associated with fossil fuel imports.

2.2.2 National Climate Policy

Draft Programme for Government (2025)

The Draft Programme for Government 2025 (January 2025) places specific emphasis on climate change, stating The Government's approach will ensure continued climate progress while growing the economy. The programme states that the government are committed to delivering actions to achieve a reduction in greenhouse gas emissions by 51% from 2018-2030 and net-zero no later than 2050. The programme commits to publishing an annual Climate Action Plan, placing a focus on a smaller number of strategic and impactful actions across all sectors, and publish a quarterly progress report.

With regard to energy generation, the Programme notes that the government is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030 and states that the Government will "*develop a comprehensive plan to accelerate energy generation, connectivity, and planning processes".*

The Climate Action and Low Carbon Development Act 2015 (as amended)

The Climate Action and Low Carbon Development 2015 (as amended) ('the Climate Act') legally binds Ireland to achieve net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade.

The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change. As indicated by the premise of the legislation, the reduction of emissions is a key proponent of the Climate Act and incorporates the following key provisions:

- Embeds the process of setting binding and ambitious emissions-reductions targets in law;
- Provides for a national climate objective, which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy;
- Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% over the period to 2030, relative to a baseline of 2018;
- The role of the Climate Change Advisory Council has been strengthened;
- The government must adopt carbon budgets that are consistent with the Paris agreement and other international obligations;
- Actions for each sector will be detailed in the Climate Action Plan which must be updated annually; and
- Local Authorities must prepare individual Climate Action Plans which will include both mitigation and adaptation measures and will be updated every five years.

Under Section 15 of the Climate Act, public bodies are obliged to, in so far as practical, perform their functions in a manner consistent with the latest Climate Action Plan, the National Energy & Climate Plan 2021 – 2030 and other national climate mitigation and adaptation plans. ABP, as a public body, with consenting functions must comply with this obligation in determining the subject application.

The Project has the capacity to be a nationally important wind energy generator, contributing to the 51% reduction in emissions being sought, which is as outlined above a legally binding requirement. The Project is therefore consistent with and needed to achieve the binding emissions reduction targets at a national level.

Carbon Budgets

To achieve the 51% emissions reduction target, the Climate Act requires the Climate Change Advisory Council (CCAC) to recommend a proposed programme of economy-wide 5-year Carbon Budgets to the Minister for the Environment, Climate and Communications. The first national carbon budget programme proposed by the Climate Change Advisory Council, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets[6]. The total emissions allowed under each budget are shown in Table 2-1 below.

[6] *Climate Change Advisory Council Carbon Budget Technical Report (October 2021)* https://www.gov.ie/en/publication/9af1b-carbon-budgets/

Table 2-1: Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030, thus allowing compliance with the 51% emissions reduction target by 2030.			

Section 6C of the Climate Act provides that the Minister shall prepare, within the limits of the carbon budget, the Sectoral Emissions Ceilings. These ceilings set out the maximum amount of greenhouse gas emissions that are permitted in each sector. The Government approved Sectoral Emissions Ceilings on 28 July 2022. The electricity sector is allocated a sectoral ceiling of 40 Mt CO2 eq for the first budget (2021-2025) and a sectoral ceiling of 20 Mt CO2 eq for the second budget period (2026-2030). The SEAI estimates that 68% of the sectoral emissions ceiling has now been used in the first 3 years of the first carbon budget period 2021–2025)[7].

Climate Action Plan 2023

The Climate Action Plan 2023 (CAP23) was published in December 2022 by the Department of the Environment, Climate and Communications. This outlines the actions required to 2035 and beyond to meet Ireland's commitment to becoming carbon neutral by 2050. CAP23 sets out a roadmap to deliver on Irelands climate ambition and is aligned to ensure that Ireland achieves its legally binding target (the Climate Action and Low Carbon Development (Amendment) Act 2021) of net-zero greenhouse gas emissions no later than 2050. The target aims for a reduction in emissions of 51% over the period 2018 to 2030 and in doing so, prevent / mitigate the potentially devastating consequences of climate change on Ireland's environment, society, economic and natural resources.

The CAP23 states that to do so, Ireland must harness the untapped indigenous renewable resources and has a target of achieving 80% of energy being produced from renewable sources by 2030 with a target of 5GW of that being produced by offshore wind. Measures set out in CAP23 to achieve these targets include to 'accelerate and increase the deployment of renewable energy to replace fossil fuels' (Section 12.1.4 CAP23). It is clear from the message and ambition of CAP23 that the drive to deploy renewable energy projects such as the Project off Ireland's coast is critical to achieving the aims and objectives of CAP23 including reaching carbon neutrality by 2050.

"Achieving these ambitions will require a coordinated effort across Ireland and every economic sector will be involved. It requires no less than a national transformation over the coming years in how we work, travel, heat our homes, source our energy and use our land".

[7] *Sustainable Energy Authority of Ireland, 'National Energy Balance' (September 2024) https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance*

The plan notes: "*Achieving further emissions reductions between now and 2030 requires a major step up in how we accelerate and increase the deployment of renewable energy to replace fossil fuels, deliver a flexible system to support renewables, and manage electricity demand".*

Chapter 30 sets out the state of play, targets and actions for the decarbonisation of the Electricity sector. Carbon emissions from electricity have fallen by 45% between 2005 and 2020, falling by 19% between 2005-2012 and by 33% between 2012 and 2020. This trend is largely due to the availability of renewable energy generated electricity (a sixfold increase between 2005 and 2020) and an associated reduction in the use of carbon heavy fuels such as peat and coal.

Due to the scale of the challenge, and the recognition of central role of the electricity sector in achieving sector wide targets, the electricity sector has been allocated the smallest carbon budget and will require the steepest carbon emissions decline of all sectors – namely a reduction in carbon emission by 75% relative to 2018 baseline.

The measures set out for the electricity sector include *inter alia*:

- Reduce annual CO2eq. emissions from the sector to 3 MtCO2eq by 2031 (75% reduction compared to 2018);
- Accelerate and increase the deployment of renewable energy to replace fossil fuels;
- Accelerate the delivery of onshore wind, offshore wind and solar through a competitive framework to reach 80% of electricity demand from renewable energy by 2030;
- Target 5GW of offshore wind with an additional 2 GW offshore wind for green hydrogen production;
- Ensure a flexible and supportive spatial planning policy framework for onshore and offshore renewable electricity generation development that seeks to delivers a strong pipeline of renewables;
- Ensure that renewable energy generation projects and associated infrastructure are considered to be in the overriding public interest.

Having regard to the targets and measures set out above, it is clear that there is strong policy support for the provision of additional renewable energy generators, such as the Project.

Climate Action Plan 2024

The Climate Action Plan 2024 ('CAP 24') builds on CAP 23 by refining and updating the status of the actions required to deliver the decarbonisation required under the carbon budgets and sectoral emissions ceilings. The renewable electricity generation targets are unchanged from the CAP 23 (5GW of offshore wind and 80% renewable electricity share).

CAP 24 includes the latest trends in the electricity sector:

- In 2022, renewable generation accounted for 38.6% of electricity, an increase from 35% in 2021.
- Electricity accounted for 14.4% of Ireland's greenhouse gas (GHG) emissions in 2022.
- To meet the first carbon budget the electricity sector requires a decarbonisation rate of 17.3% per annum in the period 2023-2025. For context, the decarbonisation rate between 2018 and 2022 was 1.4% per annum.

The decarbonisation of the electricity sector is crucial for achieving broader decarbonisation targets across sectors such as transport, heating and industry. Electricity will serve as the primary energy source for these sectors. By decarbonising the electricity sector, it will indirectly reduce the carbon emissions of other sectors by enabling them to transition to electric-powered technologies. This is recognised by CAP 24 which states:

'The electricity sector continues to face an immense challenge in meeting its requirements under the sectoral emissions ceiling, as the decarbonisation of other sectors, including transport, heating, and industry, relies to a significant degree on electrification. The deployment rates of renewable energy and grid infrastructure required to meet the carbon budget programme for electricity is unprecedented and requires urgent action across all actors to align with the national targets.'

Chapter 30 sets out the state of play and actions for the marine environment under the CAP 24. First and foremost, the CAP acknowledges the vast renewable energy potential of Ireland's maritime area. The CAP also identifies the significance of the six MACs granted to six offshore wind energy projects off the Irish coastline, one of which is the Sceirde Rocks Offshore Wind Farm. This is an important step in realising Ireland's offshore renewable targets as a MAC is a pre-requisite for applying for planning permission. The CAP notes that the progression of the 'Phase 1' projects through the planning process with ABP *'marks an important step towards reaching our 2030 climate targets.'*

CAP 24 acknowledges the crucial role of offshore wind in meeting Ireland's electricity sector's sectoral emissions ceiling, with the emissions reductions of the 'Phase 1' projects identified and included in the emissions projects across the carbon budget periods.

"During the second carbon budget period, as the necessary infrastructure and projects come online, we will start to realise Ireland's enormous potential for offshore wind."

2.2.2.2 Project Compliance with National Climate Policy

As a 'Phase 1' project, the Project is a fundamental part of Ireland's national climate plans. The Project will make a significant contribution to achieving the CAP 24 target of 5GW of offshore wind energy by the year 2030, plus a further 2GW supporting Hydrogen generation in cycle 2031-2035. Furthermore, the country's carbon budgets are reliant on the construction and operation of offshore wind farms in order to meet sectoral emission ceilings. Currently, the electricity sector is rapidly approaching the designated sectoral ceiling of 20 Mt CO2 eq for the first carbon budget period from 2020 to 2025. The Project will aid Ireland in adhering to, or limiting the exceedance of, the legally binding carbon budgets.

2.3 Renewable Energy Policy and Targets

2.3.1 European Renewable Energy Policy

Renewable Energy Directive

The Renewable Energy Directive is the EU legal framework for the development of renewable energy across all sectors of the EU economy, supporting clean energy cooperation across EU countries. Since the introduction of the Renewable Energy Directive (RED) in 2009, the RED has undergone several revisions. Since its adoption in 2009, the share of renewable energy sources in gross final energy consumption across the EU has increased from 12.5% in 2010 to 23% in 2022[8]. Of the 27 EU member states the lowest proportion of renewable energy in gross final energy consumption was recorded in Ireland (13.1%). Crucially, the Renewable Energy Directive sets the overall target for renewable energy in the EU.

RED I - 2009

Renewable Energy Directive 2009 (RED I - the original RED) (2009/28/EC), adopted in 2009, sets binding targets for EU member states to achieve a 20% share of renewable energy in final energy

[8] *https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2*

consumption by 2020. It established a framework for national renewable energy action plans, sustainability criteria for biofuels and bioliquids, and a system of guarantees of origin for renewable energy.

RED II – 2018

RED II, the first major amendment to the RED, (2018/2001/EU) entered into force in December 2018, as part of the Clean Energy for all Europeans packages. In RED II, the overall EU target for Renewable Energy Sources consumption by 2030 was raised to 32%.

RED III – 2023

In November 2023, a revision of the Renewable Energy Directive[9] (RED III), came into force. RED III increases the EU wide renewable energy target from 32% set under the previous revision of the directive to at least 42.5%, with an ambition to reach 45% by 2030.

RED III requires Member States which fall under the indicative goals for offshore renewable energy generation to be deployed within each sea basin, identified in accordance with Article 14 of Regulation (EU) 2022/869, to publish information on the volumes of offshore energy which they plan to achieve through tenders. Such information must consider the technical and economic feasibility of the grid structure and any ongoing activities.

Member States are also required to allocate space for renewable energy projects in their maritime spatial plans. A significant addition is the requirement for Member States to reduce the complexity and to increase the efficiency and transparency of the offshore permit-granting procedure.

There is an 18-month period to transpose most of the directive's provisions into national law, with a shorter deadline of July 2024 for some provisions related to permitting for renewables.

REPowerEU

Published in May 2022 in response to Russia's invasion of Ukraine, REPowerEU aims to accelerate the energy transition and increase Europe's energy independence. The European Commission proposed the RePowerEU plan to make Europe independent from Russian fossil fuels including oil and gas, due to the high and volatile energy prices, and security of supply concerns following Russia's unprecedented military attack on Ukraine.

A key pillar of REPowerEU includes reducing the use of fossil fuels by boosting energy efficiency, **increasing renewables** and addressing infrastructure bottlenecks.

"There is a double urgency to reduce Europe's energy dependence: the climate crisis, compounded by Russia's aggression and EU's dependence on fossil fuels, which Russia uses as an economic and political weapon.

The green transformation of Europe's energy system will strengthen economic growth, reinforce its industrial leadership, and put Europe on a path towards climate neutrality by 2050.

The European Commission calls on leaders, Member States, regional and local authorities, and indeed every citizen and business, to reduce Europe's energy dependence from Russia through the implementation of [the] REPowerEU plan"

The key aims and objectives of REPowerEU can be summarised as follows:

[9] *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 (recast)*

- Accelerate the roll-out of renewables.
- Increase the 2030 target for renewables from 40%-45%.
- Tackle slow and complex permitting for major renewable projects.

REPowerEU places renewable energy in the '**overriding public interest**' acknowledging the urgency required to accelerate the roll out of renewables.

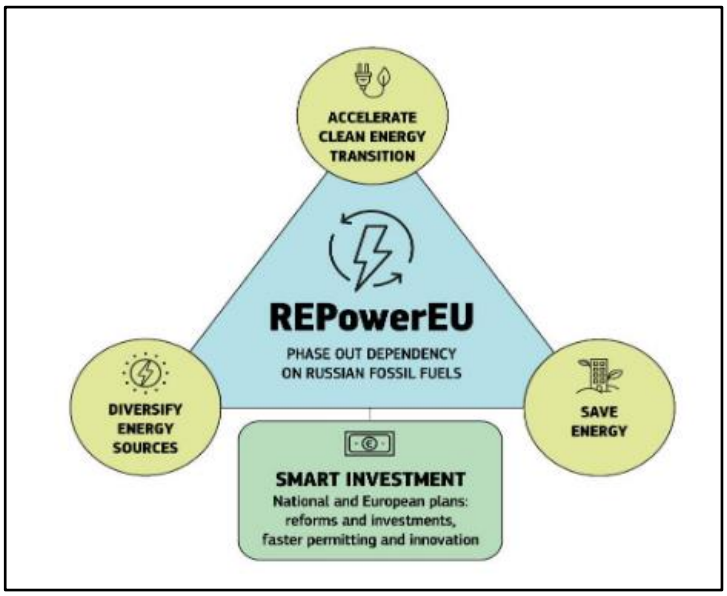

Figure 2-1: Key aspects of the REPowerEU Plan

Regulation 2022/2577

In December 2022 a text of the proposal for a Council Regulation laying down a framework to accelerate the deployment of renewable energy was agreed by the European Council and published by the European Council[10]. The Regulation (Council Regulation (EU) 2022/2577) specifically seeks to accelerate the deployment of renewable energy sources, by means of targeted measures which are capable of accelerating the pace of deployment of renewables in the European Union in the short term. The regulation focuses therefore on measures which are implementable rapidly at the Member State level, namely the streamlining of the permit-granting processes applicable to renewable energy projects.

In that regard, the Regulation introduces the presumption that, as per Recital 8 of the regulation –

"One of the temporary measures consists of the introduction of a rebuttable presumption ***that renewable energy projects are of overriding public interest*** *and serving public health and safety for the purposes of the relevant Union environmental legislation, except where there is clear evidence that those projects have major adverse effects on the environment which cannot be mitigated or compensated for. Renewable energy plants, including heat pumps or wind energy, are crucial to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and ensure the Union's security of supply. Presuming renewable energy plants, including heat pumps, are of overriding public interest and serve public health and safety would allow such projects to benefit, where necessary, from a simplified assessment for specific derogations foreseen in the relevant Union environmental legislation with immediate effect."* (***Emphasis*** **added**)

While this Project is not seeking to utilise any derogations under European environmental legislation, the classification of renewable energy projects being '*in the overriding public interest'* highlights the

[10] *General Secretariat of the Council of the European Union, Outcome of Proceedings: Proposal for a COUNCIL REGULATION laying down a framework to accelerate the deployment of renewable energy (File no. 022/0367(NLE)) (22.12.2022)*

strong support at a European Union wide level and the urgent need for developments such as the Project at a European wide level.

Offshore wind energy in particular is identified as a significant future opportunity, as resources are stable and abundant, and public acceptance is higher. The plan states *"to further strengthen the EU wind sector's global competitiveness and achieve the REPowerEU ambition with fast wind energy deployment, supply chains need to be strengthened and permitting drastically accelerated.".*

The Project is directly supported through the REPowerEU framework. In this regard, the Project is clearly in the overriding public interest.

The regulation, which has immediate application in Member States, applies to "*all permit-granting processes that have a starting date within the period of its application*" and includes a number of tangible measures aimed at streamlining the permit-granting process and facilitating the accelerated deployment of renewable energy.

'A fast deployment of renewable energy sources can help to mitigate the effects of the current energy crisis, by forming a defence against Russia's actions. Renewable energy can significantly contribute to counter Russia's weaponisation of energy by strengthening the Union's security of supply, reducing volatility in the market and lowering energy prices.'[11]

Central to the regulation is the presumption that renewable energy development must be considered to be in the overriding public interest when addressing competing interests under the Habitats Directive (92/43/EEC), Birds Directive (2009/147/EEC) and the Water Framework Directive (2006/60/EC) and that renewable energy projects should be given priority when balancing legal interests in a given case – Article 3, part 2 states:

> 2) 'Member States shall ensure, at least for projects which are recognised as being of overriding public interest, that in the planning and permit-granting process, the construction and operation of plants and installations for the production of energy from renewable sources and the related grid infrastructure development are given priority when balancing legal interests in the individual case.... (emphasis added)'

The initial period of application of the Regulation which has since been extended (see below) is the 30 December 2022 to 29 June 2024. However, the Regulation included provision for the EU Commission to review the application of, and continued need for, the measures included in the Regulation. By Regulation 2024/223 of the 22 December 2023 the Council of the European Union, Regulation 2022/2577 was extended and amended, with Article 3 applying to all permit-granting processes commenced up to the 30 June 2025.

The importance, continued need and effectiveness of Article 3(2) of Regulation 2022/2577 in aiding the accelerated deployment of renewable energy is explained in Recital 14 of Regulation 2024/223:

'...Article 3(2) of Regulation (EU) 2022/2577 requires priority to be given to projects that are recognised as being of overriding public interest whenever the balancing of legal interests is required in individual cases and where those projects introduce additional compensation requirements for species protection... The first sentence of Article 3(2) of Regulation (EU) 2022/2577 has the potential, in the current urgent and still unstable energy situation on the energy market which the Union is facing, to further accelerate renewable energy projects since it requires Member States to promote those renewable energy projects by giving them priority when dealing with different conflicting interests beyond environmental matters in the context of Member States' planning and the permit-granting process. The Commission's report demonstrated the value of the first sentence of Article 3(2) of Regulation (EU) 2022/2577 which recognises the relative importance of renewable energy deployment in the current difficult energy

[11] *Council Regulation (EU) 2022/2577, at Recital 1*

context beyond the specific objectives of the derogations foreseen in the Directives referred to in Article 3(1) of Regulation (EU) 2022/2577. Given the particularly severe situation in the supply of energy which the Union is currently facing, it is appropriate to prolong the application of Article 3(2) of Regulation (EU) 2022/2577 in order to appropriately recognise the crucial role played by renewable energy plants to fight climate change and pollution, reduce energy prices, decrease the Union's dependence on fossil fuels and to ensure the Union's security of supply in the context of the balancing of legal interests carried out by permit-granting authorities or national courts. At the same time, it is also appropriate to keep the environmental safeguard that, for projects recognised as being of overriding public interest, appropriate species conservation measures, underpinned by sufficient financial resources, are adopted. (emphasis added)'

Energy Roadmap 2050

The Energy Roadmap 2050 was published by the European Commission in 2011 and analyses the transition of the contemporary energy system in ways that would be compatible with the greenhouse gas reductions targets as set out in the Renewable Energy Directive (Directive 2009/28/EC) while also increasing competitiveness and security of supply. To achieve these targets and objectives, the Roadmap states that significant investments will need to be made in new low-carbon technologies and renewable energy, e.g. wind energy infrastructure, energy efficiency and grid infrastructure. Five main routes are identified to achieving a more sustainable, competitive and secure energy system in 2050:

- High Energy Efficiency;
- Diversified Supply Technologies;
- High Renewable Energy Sources;
- Nuclear energy; and
- Carbon capture and storage.

The analysis found that decarbonising the energy system is technically and economically feasible. The Roadmap notes that all scenarios show the biggest share of energy supply technologies in 2050 comes from renewables. As such, a major prerequisite for a more sustainable and secure energy system is a higher share of renewable energy up to and beyond 2030 to 2050. Each of the scenarios assumes in the analysis that increasing the share of renewable energy and using energy more efficiently are crucial, irrespective of the particular energy mix chosen.

EU Strategy on Offshore Renewable Energy (2020)

In November 2020, the EU Commission published its strategic plan for Offshore Renewable Energy, with the objective of increasing Europe's current offshore wind capacity of 12 GW to a minimum of 60 GW by 2030 and reaching 300 GW by 2050. This collaborative effort will involve cross-border cooperation and the integration of offshore renewable energy development objectives into the National Maritime Spatial Plans, which coastal states were required to submit to the Commission by March 2021.

In order to realise these targets, the Commission estimates that an investment of nearly €800 billion will be necessary between the present and 2050. To facilitate and attract such significant investments, the Commission has outlined several key measures. One of these key measures, relevant to the Project, is the aim to establish a clear legal framework including clarifications of electricity market rules, revisions of the State aid guidelines on energy and environmental protection, and amendments to the Renewable Energy Directive. These efforts are intended to streamline and facilitate the cost-effective deployment of renewable offshore energy.

Revised TEN-E Regulation

The revised TEN-E Regulation (EU/2022/869) entered into force in June 2022. The revised regulation aims to enhance the EU's energy infrastructure policy and aligns with the European Green Deal. Under

the revised regulation, the member states agreed to non-binding offshore wind energy goals to achieve by 2050, with intermediate goals for 2030 and 2040. The cumulative goal committed to by member states across all five of the EU's five sea basins is 111 GW, nearly twice as much as the initial objective of at least 60 GW set out in the 2020 EU Offshore Renewable Energy Strategy. To bridge the disparity between the 111 GW committed by Member States and the existing capacity as of 2022, an average annual installation of almost 12 GW is required – a significant increase compared to the 3 GW installed in 2023.

Ireland is a part of the Northern Seas offshore priority corridor and the Atlantic offshore priority corridor. The goals for Ireland, as part of the Northern Seas and Atlantic corridors, agreed to by the Irish government, are provided below in Table 2-2.

Table 2-2: Offshore renewable energy goals provided by the Irish Government

Sea Basin	2030 Goal (GW)	2040 Goal (GW)	2050 Goal (GW)
North Seas	4.5	13	20
Atlantic	0.5 - 1	7	15
Total	5 – 5.5	20	35

The Atlantic basin includes the Atlantic Ocean area to the west, north-west and south-west of Ireland. As the only 'Phase 1' offshore wind project in the Atlantic Sea basin, the Sceirde Rocks Offshore Wind Farm is the only offshore wind energy project capable of being constructed by 2030 and enabling Ireland to reach its goal set under the requirements of the revised TEN-E regulation.

European Wind Power Action Plan (2023)

The EU Wind Power Action Plan, published in October 2023, outlines several key actions to boost the offshore wind sector and ensure it contributes significantly to the EU's renewable energy targets. The plan is divided into 6 key pillars:

1. Acceleration of deployment through increased predictability and faster permitting
2. Improved auction design
3. Access to finance
4. Competitive international environment
5. Skills
6. Industry and Member State collaboration

The ultimate objective of the EU Wind Power Package was the European Wind Charter which has now been signed by 26 EU member states, including Ireland. Under the charter, Ireland has committed to accelerate the rollout of wind energy, with a focus on implementing actions on permitting, financing, and auctioning.

2.3.1.2 Project Compliance with European Renewable Energy Policy

The Project is considered to be fully in accordance with the above-mentioned EU Policy targets. An EU wide binding target of 42.5% renewable energy by 2030 could be achieved by the implementation of the Project and similar projects. Reaching 42.5% target is dependent on the offshore wind energy sector and its contribution to Europe's renewable energy supply. Currently, there is commitment from EU member states to reach an installed capacity of 111GW, the Project will directly contribute towards meeting this commitment.

The RePowerEU plan, aims at increasing the energy security within the EU and increasing the share of renewable energy onto the EU electricity grid. A part of this plan includes *'Speeding up renewables permitting to minimise the time for roll-out of renewable projects and grid infrastructure improvements'*.

Having regard to the policies and legislation set out above, it is considered that the Project is strongly supported by and supports the achievement of EU policy.

2.3.2 National Renewable Energy Policy

White Paper on 'Ireland's Transition to a Low Carbon Energy Future' 2015 - 2030

On 12th May 2014, the Green Paper on Energy Policy in Ireland was launched which marked the start of a public consultation process on the future of Ireland's energy policy over the medium to long-term. The Department of Communications, Climate Action & Environment acknowledged that energy is an integral part of Ireland's economic and social landscape and that "*a secure, sustainable and competitive energy sector is central to Ireland's ability to attract and retain Foreign Direct Investment and sustain Irish enterprise. The three key pillars of energy policy are to focus on security, sustainability and competitiveness*".

Following on from an extensive consultation process, a Government White Paper entitled '*Ireland's Transition to a Low Carbon Energy Future 2015-2030*' was published in December 2015 by the (then) Department of Communications, Energy and Natural Resources ("DCENR"). This Paper provides a complete energy update and a framework to guide policy up to 2030.

The policy framework was developed to guide policy and actions that the Irish Government intends to take in the energy sector up to 2030 and also reaching out to 2050 to ensure a low carbon future that maintains Ireland's competitiveness and ensures a supply of affordable energy. The Energy Vision 2050, as established in the White Paper, describes a '*radical transformation*' of Ireland's energy system which will result in GHG emissions from the energy sector reducing by between 80% and 95%, compared to 1990 levels. The paper advises that a range of policy measures will be employed to achieve this vision with emphasis on the generation of electricity from renewable sources, of which there are plentiful indigenous supplies and increasing the use of electricity and bio energy to heat homes and fuel transport.

In this White Paper, the DCENR acknowledges that offshore wind will play a large role in the second phase of Ireland's energy transition, it states:

"Ireland's sea area is around ten times the size of its landmass and the country has one of the best offshore renewable energy resources in the world. This offers significant potential for offshore wind, wave and tidal energy."

National Energy and Climate Action Plan 2021 – 2030

National Energy and Climate Plans (NECPs) are the framework within which EU Member States must set out their climate and energy objectives, targets, policies, and measures to the European Commission in accordance with Regulation (EU) 2018/1999. Ireland published the NECP 2021-2030 in 2019 and committed to playing its part in achieving the 'five dimensions' of the Energy Union. The 'five dimensions' are as follows:

- Decarbonisation (GHG Emissions and Renewable Energy)
- Energy Efficiency
- Energy Security
- Internal Energy Market
- Research, innovation and competitiveness

In July 2024, the Department of the Environment, Climate and Communications DECC published an updated NECP. The updated NECP committed to achieving 43% of renewable energy in total energy consumption by 2030. In the trajectories set out in the updated NECP, it is found that Ireland's proposed trajectory will not be in line with the desired trajectory set out in the Governance Regulation (Regulation 2018/1999). The inability to achieve the desired trajectory underscores the critical role of offshore wind energy in meeting renewable energy targets. In providing an explanation for the inability to achieve the desired trajectory the NECP highlights the critical role of offshore wind energy, the report states *'this is primarily due to the fact that large projects, particularly offshore wind projects, cannot be constructed in shorter timeframes and will not be fully operational by the end of the decade'*.

If permitted, the Project will be capable of being installed and operational before the end of the decade, adding approximately 450MW of renewable, clean energy to our national wind energy capacity.

National Energy Security Framework

The National Energy Security Framework (DECC, April 2022) ("**NESF**") highlights clearly the impacts the Russian invasion of Ukraine and the resulting war has had on Europe's energy system. The resulting decision by the European Union to phase out the import of Russian gas, oil and coal (REPowerEU) has brought to the fore the importance of security of supply and how energy policy is designed for long-term resilience. It takes account of the need to decarbonise society and economy, to reduce Ireland's emissions by 51% over the decade to 2030 and reach net zero emissions by 2050. According to the SEAI's Energy in Ireland (2021) report, oil accounts for 45% of Ireland's primary energy requirement making it one of the highest rates of oil dependency in the EU. The International Energy Agency, of which Ireland is a member country, includes a 10-point plan to cut oil use which calls for an acceleration in the deployment of wind and solar projects. Ireland's response per the Framework is set out over three themes:

- Theme 1 – managing the impact on consumers and businesses
- Theme 2 – ensuring security of energy supply in the near-term
- Theme 3 – reducing our dependency on imported fossil fuels in the context of the phasing out of Russian energy imports across the EU

In relation to theme 3, the Framework highlights that replacing fossil fuels with renewables, including wind energy, will be a focus area of work. The Framework calls for "*Supportive policies across Government and State agencies"* which *"can reduce barriers and fast track permitting for renewable energy generation projects. Similarly, renewable energy developers need to match this through taking a leadership role in delivering high quality applications to relevant consenting authorities, meeting project milestones on time and minimising delays"*. Offshore wind is identified as a "key focus" area for the implementation of Theme 3. The framework supports the Delivery Taskforce that was established to accelerate the development of offshore wind.

Having regard to the above, it is clear that the provision of the Project, together with additional renewable energy generation, is vital in helping to secure the State's energy supplies and reduce reliance on imported fossil fuels.

Energy Security in Ireland to 2030 – Energy Security Package

Published in November 2023, the energy security package titled 'Energy Security in Ireland to 2030' builds on the policies set out in the NESF. The energy security package is based on the recognition of the following fact:

"Ireland's future energy will be secure by moving from an oil-, peat-, coal- and gas-based energy system to an electricity-led system maximising our renewable energy potential, flexibility and being integrated into Europe's energy systems."

The energy security package includes a range of measures to implement this approach by the prioritisation of the following:

1. *Reduced and Responsive Demand.*
2. *Renewables-Led System.*
3. *More Resilient Systems.*
4. *Robust Risk Governance.*

Independent research undertaken as part of the package, the McCarthy Report[12], provides an analysis of developments in the electricity sector in Ireland. The McCarthy Report makes the following observation in relation to the consenting process:

"The problem of delays encountered by major infrastructure projects, including in the electricity system, due to planning and environmental consent issues was evident. They had been commented upon by the International Energy Agency in its 2019 review of Ireland which named planning delays as the principal challenge to delivery of policy for the sector."

The energy security package aims to ensure that the planning system is fully aligned and resourced to fully support accelerated renewable energy development. It also aims to ensure renewable energy projects are prioritised in line with the recast Renewable Energy Directive and RePowerEU.

The Project is set to significantly support the government's objectives in ensuring the State's energy security. This Project serves as a domestic renewable energy generator capable of providing clean electricity to the national electricity grid, contributing to a renewables-led system.

Policy Statement on the Framework for Ireland's Offshore Electricity System (2021)

The Policy Statement on the Framework for Ireland's Offshore Energy Electricity Transmission System was published by the Department of the Environment Climate and Communications in 2021. The policy statement aims to develop Ireland's offshore wind energy capabilities to meet its greenhouse gas emissions targets. The policy provides for the development, operation and ownership of Ireland's offshore electricity transmission system through the following key policies:

- "A Phased transition from the current decentralised offshore transmission system model to a centralised model, with transmission system assets to be planned, developed, owned and operated by EirGrid";
- "It envisages that the successful First Phase offshore renewable projects, will develop the associated offshore transmission system requirement";
- "The development of the offshore transmission system in the Second Phase may be carried out by either renewable energy projects, and/ or EirGrid"; and
- "Third Phase offshore transmission system development will be developed exclusively by EirGrid, with maritime areas in which renewables development may take place, to be provided for by the second Offshore Renewable Energy Development Plan (OREDPII)"

As a phase 1 project, the Project is aligned with the offshore transmission policy approved by government. Connection to the national electricity grid forms part of the Project.

Powering Prosperity: Ireland's Offshore Wind Industrial Strategy

Ireland's Offshore Wind Industrial Strategy was published by the Department of Enterprise, Trade and Employment in March 2024. The strategy includes 40 actions to be implemented in 2024 and 2025. The

[12] *McCarthy (2023)* https://www.gov.ie/pdf/?file=https://assets.gov.ie/276441/eb496e01-5c01-4594-af09-74342b4ac971.pdf#page=null

strategy aims strengthen the offshore wind supply chain in Ireland in order to fully capitalise on Ireland's abundant offshore renewable energy resource.

The Offshore Industrial Strategy also aims to ensure the economic development of the offshore renewable energy sector is regionally balanced. As the only 'Phase 1' project located off the west coast, the Project is essential to ensure that employment, economic and business opportunities are evenly distributed across the country.

2.3.2.2 Project Compliance with the National Renewable Energy Policy

The National Energy Security Framework identifies a number of measures to fast-track Ireland's transition to renewable energy projects. With regard to this, it is considered that the Project is fully in accordance with the framework by increasing the share of renewable energy onto the national grid and thereby accelerating Irelands transition to a low carbon energy future.

As a phase 1 project, the Project is aligned with the offshore transmission policy approved by government. As such, it is considered that the Project is strongly supported by and supports the achievement of national renewable energy policy targets.

2.4 Climate and Renewable Energy Target Progress

At a European level, the latest data shows that, as of 2022, 23% of energy came from renewable energy sources[13]. This represents an increase of 1.1% compared to 2021 levels. While progress is being made to increase the share of renewable energy, it is clear that all EU member states need to intensify their efforts to collectively comply with the target of 42.5% set in the latest revision of the renewable energy directive (RED III).

Of the 27 EU member states, Ireland has the lowest proportion of renewable energy at 13.1%. It is evident that Ireland is not performing well when compared against our European counterparts and that urgent action is required increase the overall share of renewable energy in our gross final energy consumption.

[13] https://ec.europa.eu/eurostat/en/web/products-eurostat-news/w/ddn-20231222-2

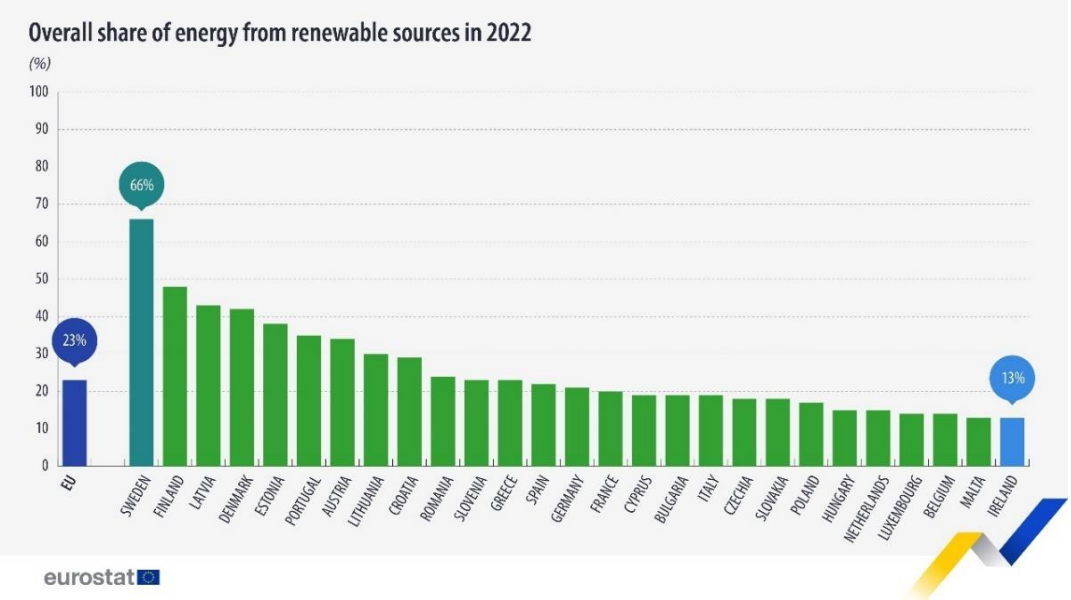

Figure 2-2: Overall share of energy from renewable sources (source: Eurostat)

When it comes to the share of renewable energy in electricity, Ireland does perform better. In 2022, 36.8% of Ireland's electricity was renewable. This puts Ireland below the EU average of 41.1%[14].

Ireland's Greenhouse Gas Emissions Projections 2023 – 2050 (May 2024)

The Environmental Protection Agency (EPA) publishes Ireland's Greenhouse Gas Emission Projections and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2023–2050' was published in May 2024. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2050 set out under the EU emission reduction targets as set out under the Effort Sharing Regulation.

The EPA has produced two scenarios in preparing greenhouse gas emissions projections to 2050, a "With Existing Measures" (WEM) scenario and a "With Additional Measures" (WAM) scenario. These scenarios forecast Irelands greenhouse gas emissions in different ways. The WEM scenario assumes that no additional policies and measures, beyond those already in place by the end of 2022. This is the cut off point for which the latest national greenhouse gas emission inventory data is available, known as the 'base year' for projections. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland's Climate Action Plan 2024.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51 per cent emissions reduction target (by 2030 compared to 2018) based on these projections which include most 2024 Climate Action Plan measures.
- Emissions from the Energy Industries sector are projected to decrease by between 57 and 62 per cent over the period 2022 to 2030. Renewable energy generation at the end of the decade is projected to range from 69 to 80 per cent of electricity generation as a result of a projected rapid expansion in wind energy and other renewables.
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded in almost all cases, including Agriculture, Electricity, Industry and Transport.

[14] https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren__custom_9264705/default/bar?lang=en

- The first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 17 and 27 per cent.

As decarbonising electricity generation will have a significant positive contribution in achieving Ireland's emissions it is clear that the Project and additional renewable energy production must be encouraged and supported if carbon saving targets are to be met.

National Energy Projections Report 2024

The National Energy Projections Report 2024, published in November 2024, sets out the latest renewable energy and climate projections by the SEAI. Based on the EPA projections outlined above which were published in May 2024, the report presents the findings of the 2024 national energy and climate modelling cycle.

The most notable conclusion drawn from this year's projections is the significant gap between projections across all scenarios and legally binding national and EU targets. Even with full implementation of CAP 24, Ireland is projected to miss its national and EU climate and energy targets for 2030.

In this year's projections, in addition to the 'WEM' and 'WAM' scenarios (defined in the previous Section), the SEAI has included a 'risk' scenario, which examines the risk of delays in achieving some of the most significant and ambitious targets set in CAP24, such as the renewable electricity targets. The risk scenario for variable renewable generation capacity was developed using forecasts from surveys of expert stakeholders. The results indicated that the risk of under-delivery of CAP24 targets is highest for offshore wind, followed then by then by solar and wind.

The table below (Table 2-3) includes the assumed rate of delivery for offshore wind across the 3 scenarios modelled by the SEAI. Under the risk scenario, the increase in offshore wind energy capacity is delayed until after 2030.

Table 2-3: Assumed end of year offshore wind generation capacity (SEAI, 2024)

Offshore Wind Capacity (GW)	WEM	WAM	Risk
2025	0.03	0.03	0.03
2030	2.7	4.0	0.03

The impact of a delayed rollout of offshore wind was then modelled, to establish the projected impact on the renewable electricity target of 80%. The results, reproduced in Figure 2-3 below, highlights the significant impact of a delayed roll-out of offshore wind energy, i.e. the Phase 1 Projects. If no new offshore wind energy capacity is added by 2030, it is projected to result in an 18% shortfall from the 80% renewable electricity target.

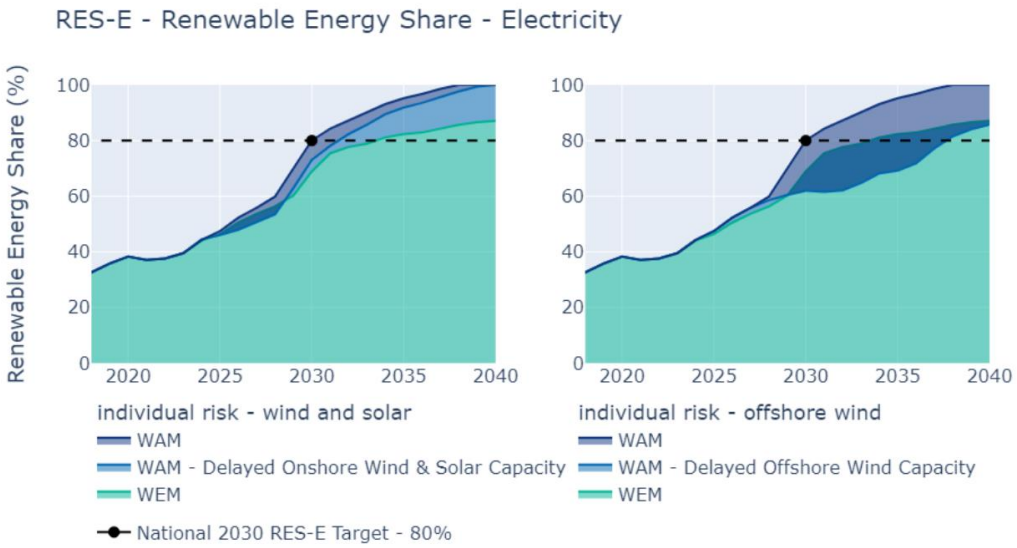

Figure 2-3: Impact of individual risks of delayed achievement on progress to RES-E target (Source: SEAI)

The impact of a delay in offshore wind installation is noted as being a particular concern. If delays occur, the SEAI state that *'there is little to no mitigation for our European renewable energy targets'.*

Energy in Ireland 2024 Report

In December 2024, the SEAI released in annual publication 'Energy in Ireland' report which looks at trends in national energy use and at the underlying driving forces, such as the economy and weather, and more recently the impacts of high energy prices. It also examines greenhouse gas emissions from energy use, energy security, cost competitiveness, and our progress towards EU renewable energy targets.

The Report identifies that Ireland's national energy-related emissions in 2023 were at their lowest level in over 30 years. Energy-related emissions in 2023 were 31.4 MtCO2eq, down 8.3% on 2022 levels, and lower even than those observed during the height of COVID impacts in 2020. Energy-related emissions fell by over 2.8 MtCO2eq in 2023 - the largest annual reduction observed in 12 years. The following are some of the key points, relating to renewable energy and energy emissions:

- Ireland's national energy-related emissions have fallen for seven of the last ten years.
- 14.1% of Ireland's primary energy was renewable in 2023, with fossil fuel remaining the dominant source of Ireland's energy.
- Wind generation provided 33.7% of electricity supply in 2023.
- 2023 electricity emissions were 7.6 MtCO2eq, the lowest on record, down 22% on 2022 levels.
- 2023 was the first year in which fossil fuel generation accounted for less than half of Ireland's gross electricity supply.
- In 2023, Ireland had 4.74 GW of installed wind capacity, up 4.5% on the previous year.

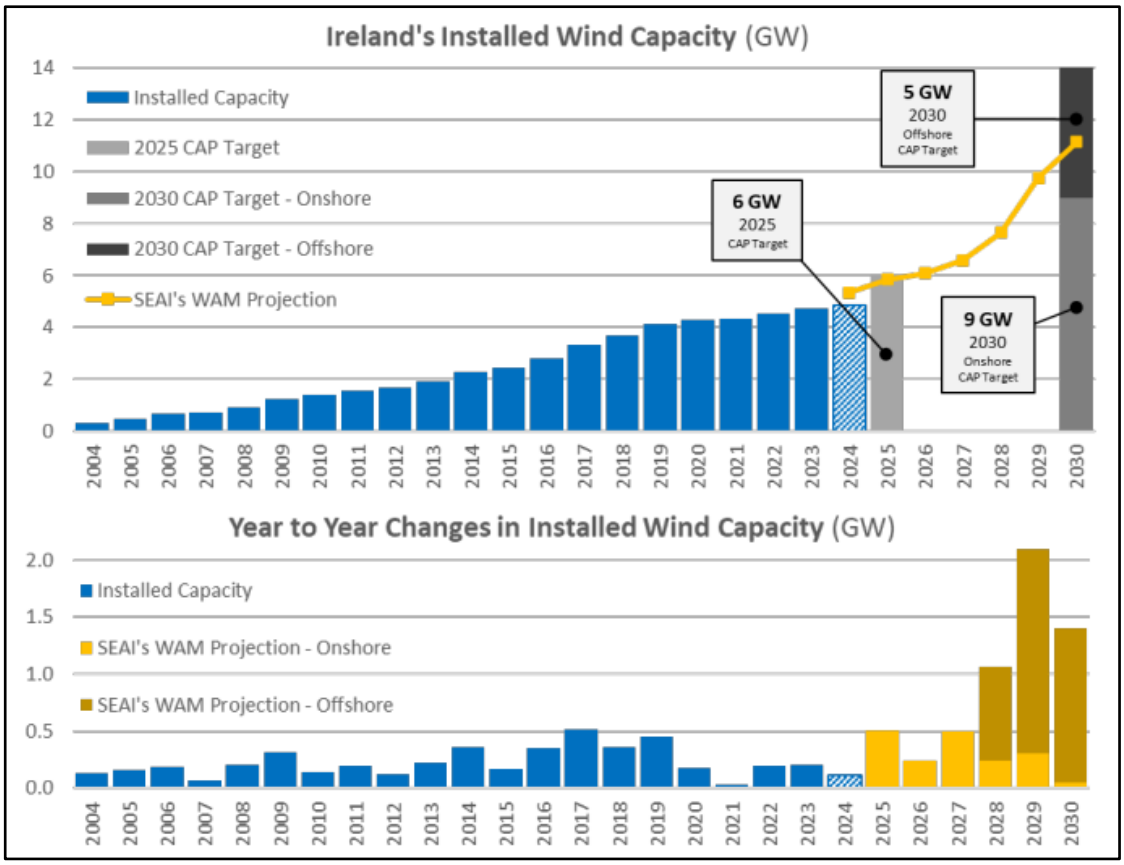

Figure 2-4: Ireland's installed wind capacity with 2024 estimates, projections to 2030, CAP targets
Source: SEAI Energy in Ireland 2024 Report, Figure 1.27

The Report states that over the last 10-years, Ireland has added wind capacity at an average rate of 0.26 GW per annum, although this has dropped to a rate of 0.14 GW over the last 5-years. To align to the pace of the 'With Additional Measures' projections needed to deliver on the 80% RES-E target, the roll-out of onshore wind capacity needs to return to the rate previously achieved between 2016 and 2019. **And offshore wind projects, delivering annual increases in installed capacity of between 0.8 GW and 1.4 GW, need to be in place before the end of 2030.** The Report then goes on to state the following

"Increasing wind generation through added wind infrastructure is key to decarbonising Ireland's electricity supply. *The decarbonisation of electricity maximised the positive impact of sustainability technologies like heat pumps and electric vehicles. The recent slow-down in added wind capacity is impacting Ireland's transition to a sustainable energy future.* ***Renewable capacity must be added faster than electricity demand increases. We must do everything we can to support the roll-out of both onshore and offshore wind*** *and grid-connected solar PV capacity".* (***emphasis*** **added**)

The Climate Change Advisory Council Electricity Sectoral Review 2024

The CCAC's Electricity Sectoral Review is the first publication under the 2024 annual review. The CCAC makes a series of recommendations for the electricity sector to stay within the electricity sectors agreed carbon budget.

The report finds that Ireland remains far behind other European counties from an offshore wind energy perspective, despite the progress made with the establishment of MARA and the first ORESS auction. The CCAC emphasise that it is crucial that successful projects from the ORESS auction *'progress swiftly and fairly through the planning system to enable the achievement of CAP24 targets for offshore wind energy'*. The CCAC also recognises that at present, Belfast is the only port on the island of Ireland capable of servicing offshore wind energy construction. The CCAC urge government to invest and support the port infrastructure essential for developing Ireland's offshore wind energy industry.

Ireland's Climate Change Assessment (January 2024)

In January 2024, the EPA published Ireland's Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes.

- Volume 1: Climate Science – Ireland in a Changing World
- Volume 2: Achieving Climate Neutrality in 2050
- Volume 3: Being Prepared for Irelands Future
- Volume 4: Realising the Benefits of Transition and Transformation

The ICCA Synthesis Report states that having peaked in 2001, Irelands greenhouse gas emissions have reduced in all sectors except agriculture. However, Ireland currently emits more greenhouse gases per person than the EU average. The report goes on to state that there has been an identified gap in policy that indicates that Ireland will not meet its statutory greenhouse gas emission targets. Achieving net zero carbon dioxide emissions by 2050 requires significant and unprecedented changes to Ireland's energy system. Policies tailored to suit different stages of technology development are critical for achieving a net zero energy system. Established technologies, such as wind energy, solar photovoltaics and bioenergy will be key in meeting short-term emission reduction targets (i.e. 2030), whereas offshore wind infrastructure is expected to be the backbone of future energy systems. This can only be achieved with appropriate support schemes, regulation and investments for synergistic growth of offshore wind and other renewable technologies.

There are well-established 'no-regret options' that need to happen now, which can get Ireland most of the way to net zero carbon dioxide emissions. Beyond that, there are 'future energy choices' relating to the scale and magnitude of technologies that will assist in achieving Ireland's statutory climate targets. Ireland's no-regret options include deployment of market-ready renewables (e.g. wind energy and solar photovoltaics). Renewable energy can increasingly provide our future energy needs but will need to be complemented with carbon dioxide removal to achieve a net zero energy system in hard-to-abate sectors.

2.5 Planning Policy Context

This Section of the EIAR provides the strategic planning context of the Project and sets out how Project aligns with national, regional and local policies, frameworks, guidelines and plans. This Section has been broken down to the following Sections:

- National Policy Context
- Regional Policy Context
- Local Policy Context

As a Phase 1 offshore wind energy project, the Project is consistent with the overall national policy objectives to increase penetration and deployment of renewable energy resources and has been designed in the context of the relevant guidelines and best practices. The Project is directly supported by ORE Policy 2 of the NMPF, which aims to ensure that offshore development proposals must be consistent with the Offshore Renewable Energy Development Plan (OREDP), which the Project is supported by. ORE Policy 2 of the NMPF also supports the prioritisation of Phase 1 Projects through the consenting process.

Further detailed assessment of the Project against the relevant national, regional and local planning policy, please refer the Planning Report, provided separately which accompanies this planning application for the Project.

2.5.1 National Policy Context

National Marine Planning Policy Statement

The Government published Ireland's first Marine Planning Policy Statement (MPPS) alongside the Draft NMPF in November 2019. The MPPS draws together and describes the existing components of Ireland's marine planning system, outlines a vision for the future development of the marine planning system, sets out the overarching policies and principles the Government expects marine planning bodies and other public bodies that engage with the marine planning system to observe and sets out high-level priorities for the enhancement of the marine planning system in Ireland. The vision for marine spatial planning in Ireland is set out as follows:

"A marine planning system with clear forward planning, development management and enforcement elements that promotes and sustains ocean health, and supports the sustainable (recreational) enjoyment, management and use of Ireland's marine resource."

The MPPS has underpinned the development of marine planning policy and legislation, such as the Maritime Area Planning Act 2021 and the NMPF. The MPPS has 10 strategic principles that continue to guide marine planning in Ireland. These strategic principles, *inter alia*, relate to forward planning, development management, the enforcement of EU and national law, ecosystem protection and restoration, heritage preservation, climate change and sea safety.

National Marine Planning Framework: Project Ireland 2040

The EU adopted EU Directive 2014/89/EU in 2014 ('establishing a framework for maritime spatial planning') (the "**MSP Directive**"), that establishes an EU-wide framework for Maritime Spatial Planning ('MSP') and required Member States to put in place Marine Spatial Plans.

The NMPF forms part of the Project Ireland 2040 and plans for the effective and sustainable management of the marine environment and associated activities, as required under the MSP Directive. The NMPF complements the National Planning Framework which guides terrestrial planning and development.

The NMPF outlines a number of 'Overarching Marine Planning Policies' (OMPPs) which include the following objectives and policies:

- Support offshore renewable energy proposal to assist in the achievement of Ireland's offshore renewable energy targets, including the development of 5 GW of offshore renewable energy capacity by 2030;
- Support for energy transition proposals to improve the security and diversity of Ireland's energy supply;
- Manage the effect of proposals on access to fishing grounds and current and future port activity; and
- Ensuring that offshore renewable energy and infrastructure proposals support safety at sea imperatives.

The NMPF is stated to be the "key decision-making tool for Government departments, State agencies, regulatory authorities and policy makers for decisions on marine activities up to 2040. Decisions will include planning applications as well as policies, projects and strategies."

The NMPF recognises the importance of offshore renewable energy in reducing greenhouse gas emissions and reaching national climate and energy targets. The offshore renewable energy policies that directly relate to the Project are outlined below.

- ***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 the 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.*
- ***ORE Policy 2:*** *Proposals must be consistent with national policy, including the OREDP and its successor (OREDPII).* ***Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime****. Into the future, areas designated for offshore energy development, under the Designated Marine Area Plan process set out in the Maritime Area Planning Bill, will underpin a plan-led approach to consenting (or development of our marine resources). (Emphasis added)*
- ***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*
- ***ORE Policy 6:*** *Proposals for infrastructure enabling local use of excess energy generated from emerging marine technologies (wave, tidal, floating wind) should be supported.*
- ***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.*
- ***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.*
- ***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.*
- ***ORE Policy 10:*** *Opportunities for land-based, coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and polices, where possible.*
- ***ORE Policy 11:*** *Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported.*

Please see Appendix 2-1, National Marine Planning Framework Compliance Report for further detail on the NMPF and the Project. Furthermore, a full detailed assessment of the Project, including a statement of consistency with all policies in the NMPF is provided in the Planning Report prepared by MKO and which is provided separately with this planning application.

As a Phase 1 offshore wind energy project, the Project is directly supported by the NMPF which aims to assist the Government's offshore renewable energy targets including the target of installing 5 GW of offshore wind capacity by 2030. The Project will significantly contribute towards this national target.

National Planning Framework: Project Ireland 2040

The National Planning Framework (NPF), published in February of 2018, forms the top tier of terrestrial national planning policy which establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level development plans.

The NPF notes that the population of Ireland is projected to increase by approximately 1 million people by 2040 which will result in a population of roughly 5.7 million. This population growth will

place further demand on both the built and natural environment. To strengthen and facilitate more environmentally focused planning at the local level, the NPF states that future planning and development will need to:

"*Tackle Ireland's higher than average carbon-intensity per capita and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country's prodigious renewable energy potential.*"

A key focus throughout the NPF is the fostering of a transition toward a low carbon, climate-resilient society. In this regard, one of the stated key elements of the NPF is an Ireland which has a secure and sustainable renewable energy supply and facilitates the ability to diversify and adapt to new energy technologies. Key features identified in the NPF to facilitate the transition towards a low carbon energy future relevant to this application, include:

- A shift from predominantly fossil fuels to predominantly renewable energy sources.
- Decisions around development and deployment of new technologies relating to areas such as wind.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

Relevant to the Project, the **National Strategic Outcome 8** (*Transition to Sustainable Energy*), notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network.

Ireland's offshore renewable energy policy under **Objective 42** aims *'To support, within the context of the [OREDP] and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements.'*

In regard to the above, it is clear that the provision of offshore renewable energy generation and associated transmission infrastructure is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

Offshore Renewable Energy Development Plan

In 2014, the Government published the OREDP. The OREDP sets out key policy objectives and actions to enable Ireland to utilise its significant offshore energy resources. In this way, the OREDP provides a framework for the sustainable development of Ireland's offshore renewable energy resources. The OREPD sets a vision for the development of renewable energy in Irish waters, it states:

"Our offshore renewable energy resource contributing to our economic development and sustainable growth, generating jobs for our citizens, supported by coherent policy, planning and regulation, and managed in an integrated manner".

The core principles to underpin the development of Ireland's offshore wind and ocean energy resource are:

- Ensure offshore renewable energy development is fully in line with EU environmental obligations, best practice, and the suggested mitigation measures developed as part of OREDP.
- The exploitation of our national offshore wind and ocean resources must provide a substantial economic return to Ireland.

- Coordination of the development of the Irish offshore renewable energy industry must be in line with government initiatives.
- The use of public resources to facilitate the infrastructural development of offshore wind and ocean energy must be cost effective and demonstrate value for money.
- The governance of the OREDP must be in line with best practice, with robust and transparent reporting mechanisms.

The OREDP is relevant for the assessment of offshore wind projects against 'marine spatial planning objectives' and 'proper planning and sustainable development'.

A Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) was undertaken to determine the appropriate level of marine renewable development that could potentially take place without likely significant adverse effect on the environment. The study area for the purpose of carrying out the SEA was split into six assessment areas. The Project is located in Assessment Area 5 – West Coast, in which wind and wave energy are assessed. The OREDP provides guidance to planning authorities when considering the appropriate levels of development to permit from an environmental perspective. The OREDP states that *'In the event offshore wind is successful in finding a route to market, the findings and recommendations of the SEA and AA, which underpin this OREDP, will provide valuable environmental information to assist in the development planning decision making process'*.

The overall conclusion of the SEA and AA found that it would be possible to achieve the high scenario of 4,500MW from offshore wind without likely significant adverse effect on the environment. The total development potential of fixed bottom offshore wind turbines in Assessment Area 5 without causing likely significant adverse effects on the environment is found to be 500MW[15]. This development potential figure is based on the cumulative assessment findings of the SEA and AA. These figures are presented based on the assumption that the mitigation measures will be implemented in full, to ensure significant adverse effects do not occur on the marine environment. Two forms of mitigation are identified, plan level mitigation and project level mitigation. The OREDP provides suggested project level mitigation measures, which have been considered throughout the Project design stage, throughout the EIAR and in the identification of the mitigation measures proposed for the Project, detailed in Chapter 33 of this EIAR.

The Project is in full compliance with the provisions of the OREDP, Assessment Area 5 is identified as having the capacity to house 500MW of fixed bottom offshore wind energy without likely significant adverse effect on the environment. The project level mitigation measures set out in the OREPD have been strongly considered when determining the necessary mitigation for the Project. The mitigation measures, outlined in Chapter 33 of this EIAR, will ensure that impacts on the environment are mitigated where possible.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as housing, health, population growth, and most relevant to the Project, climate change. It is stated that the NDP 2021 – 2030 will be the *'largest and greenest ever delivered in Ireland'*, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and

[15] *Offshore Renewable Energy Development Plan (Department of Communications, Energy and Natural resources, 2014), Table 3, page 3.*

other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.

The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities is the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*', which is certainly an ambitious and an explicit driver for the deployment of new renewable generators at the scale of the Project. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

Project Compliance with the National Planning Policy

With regard to the above, it is considered that the Project is in line with and supported by the NMPF and the OREDP. The Project is also in compliance with the National Planning Framework and the National Development Plan 2021-2030, as it will contribute to the delivery of renewable energy, economic activity and rural enterprise.

The Project is fully supported by the OREDP, which has identified the west coast area within which the Project is located, as being capable of accommodating 500MW of fixed bottom offshore wind energy without causing a likely significant adverse effect on the environment. Furthermore, ORE Policy 2 of the NMPF directly supports the timely assessment of '*Relevant Projects designated pursuant to the Transition Protoc*ol'.

It is clear that national policy documents recognise the significant opportunity to develop renewable energy in the marine area. With population growth and the electrification of society to meet climate objectives, it is clear that demand for energy will increase in the coming decades. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NMPF and the NPF recognise the need for increased renewable energy onto the national grid. This shift from fossil fuels is dependent upon schemes such as the Project to generate significant amounts of renewable energy. Given the projected demand increase, it is certain that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. The addition of 30 no. WTGs, with a MEC of 450MW, will significantly contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level. In this regard, the Project is directly supported by ORE Policy 1 in the NMPF. The OREDP and the NDP are clear in their commitment to support the transition to a low-carbon, climate resilient society.

The Project, if permitted, will provide clean, renewable electricity to the national grid, furthering development objectives of the OREDP and NDP, namely the target to increase the share of renewable electricity up to 80% by 2030 and the utilisation of Ireland's offshore wind energy resource.

2.5.2 Regional Policy Context

Regional Spatial & Economic Strategy for the Northern and Western Region

The Project is located off the coast of County Galway, which is a member of the Northern and Western Regional Assembly (NWRA). The NWRA has a recognised leadership role in setting out regional policies and coordinating initiatives which support the delivery and implementation of the National Planning Framework (NPF). The primary vehicle for this is the preparation and implementation of the Regional Spatial and Economic Strategy (RSES).

The RSES acknowledges that the region has a pivotal role in delivering a successful transition to Ireland's proposed low carbon economy with huge potential for growth in renewables. There is '*still significant potential*' for all new renewable energy outputs to the grid. In order to facilitate the growth of renewables within the region, the RSES notes that the NWRA aims to encourage stakeholders, i.e. industry, commercial etc., to be the first to facilitate new opportunities and concentrate on possibilities to further advance renewable energy generation and use.

These strategic aims are captured in Policy Objectives 4.17 and 4.18:

- ***RPO 4.17****: To position the region to avail of the emerging global market in renewable energy by stimulating the development and deployment of the most advantageous renewable energy systems, including:*
  - *Stimulating the development and deployment of the most advantageous renewable energy systems;*
  - *Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses; and*
  - *Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.*
- ***RPO 4.18****: Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.*

As indicated above, there is a clear policy support within the region to identify and capitalise on emerging opportunities associated with the transition to a decarbonised economy such as renewable energy generation. The RSES also specifically endorses the development of offshore wind energy production in suitable locations and recognises that '*Off-Shore renewables will be critically important if the Country is to meet the energy targets set out for 2030'.*

Offshore wind energy production is directly supported by Policy Objectives 4.19 and 4.33:

- ***RPO 4.19****: Support the appropriate development of offshore wind energy production through the adequate provision of land-based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.*
- ***RPO 4.33:*** *To facilitate where possible Marine Renewable Technology Projects off the West and North West coasts of Ireland, and subject to environmental and amenity considerations (feasibility studies), and where applicable, enable National Grid connection.*

The RSES is ultimately supportive of the future growth of offshore renewable energy technology in the region and sets a clear precedent to identify and capitalise on those opportunities associated with the transition to renewable energy generation.

The delivery of electricity grid infrastructure is also supported in the RSES, for example through the following policy objectives:

- ***RPO – 8.1:*** *The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.*
- ***RPO - 8.3:*** *The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.*
- ***RPO – 8.4****: That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.*

Regional Economic and Spatial Strategy for the Southern Region

The Project includes a grid export cable which comes ashore at Killard, County Clare. The grid export cable runs predominantly in the road network from the OLL to the Moneypoint 220kV Substation where it connects to the national grid. County Clare is located in the Southern Region and is a member of the Southern Regional Assembly (SRA). The SRA is primarily focused on the preparation and implementation of Regional Spatial and Economic Strategies (RSESs), integration of Local Economic and Community Plans (LECPs), management of EU Operational Programmes, EU project participation, implementation of national economic policy, and working with the National Oversight and Audit Commission.

The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework. It will be implemented in partnership with local authorities and state agencies to deliver on this vision and build a cohesive and sustainable region.

"The RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan 2018-27 (NDP). As the regional tier of the national planning process, it will ensure coordination between the City and County Development Plans (CCDP) and Local Enterprise and Community Plans (LECP) of the ten local authorities in the Region."

The RSES is committed to the implementation of the Climate Action Plan 2019 (superseded by CAP 24) by playing its part in the development of wind, wave, tidal, solar, hydro, and bio energy. The ambition is reflected in the Regional Policy Objectives (RPO's) which sets out the key regional policies for the 12-year lifetime of the plan. With regards to climate change the RSES notes that:

"All global risks of climate change are risks to the Southern Region. The Southern Regional Assembly is committed to play its role to put in place a high-level regional strategy for transition to a low carbon economy and society across all sectors."

As noted and recognised by the RSES, Ireland and the EU are signatories to the Paris Agreement, a legally binding international agreement to restrict global temperature rises to below 2°C above pre-industrial levels, and to limit any increase to 1.5°C to significantly reduce the risks and impacts of climate change. It is further noted that *'Ireland's international commitments also extend to the UN's Sustainable Development Goal 13, to 'take action to combat climate change and its impacts."*

The following Regional Policy Objectives have been listed with regards to climate change:

- ***RPO 87 Low Carbon Energy Future:*** *The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.*
- ***RPO 88 National Mitigation Plan and National Adaptation Framework:*** *The RSES is committed to the implementation of the National Mitigation Plan and National Adaptation Framework: Planning for a Climate Resilient Ireland to enable the Region transition to a low carbon, climate resilient and environmentally sustainable economy. It is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.*
- ***RPO 90 Regional Decarbonisation****: It is an objective to develop a Regional Decarbonisation Plan to provide a framework for action on decarbonisation across all sectors. The Regional Decarbonisation Plan shall include existing and future targets for each sector and shall be prepared with key stakeholders, including the Climate Action Regional Offices, and shall identify the scope and role of the Plan, the requirements for SEA, AA and the timescale for its preparation. Implementation mechanisms and monitoring structures for the Plan should also be established.*

Section 4.9 *'Marine and Coastal Assets'* of the RSES aims to to improve economic growth through the sustainable use of its marine resource. This includes the development of marine energy projects to realise Ireland's offshore renewable energy potential. In support of the offshore renewable energy sector the following policy objectives are included.

- ***RPO 85 Renewable offshore energy****: To promote regional cooperation in terms of offshore renewable energy development, environmental monitoring and awareness of the benefits of realising the Region's offshore energy potential. Initiatives arising from this objective shall be subject to robust feasibility and site selection, which includes explicit consideration of likely significant effects on European Sites and potential for adverse effects on the integrity of European sites in advance of any development.*
- ***RPO 95 Sustainable Renewable Energy Generation*** *It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.*
- ***RPO 96 Integrating Renewable Energy Sources****: It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.*
- ***RPO 99 Renewable Wind Energy:*** *It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*
- ***RPO 100 Indigenous Renewable Energy Production and Grid Injection:*** *It is an objective to support the integration of indigenous renewable energy production and grid injection.*

The RSES also acknowledges the need to develop a strong grid to support the integration of renewable energy on to the national electricity grid. The RSES sets out a number of infrastructural RPOs, relevant

to the Project which indicate that the Region is open to, and ready to invest in, renewable energy generation:

- ***RPO 219 New Energy Infrastructure****: New Energy Infrastructure It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.*
- ***RPO 220 Integrated Single Electricity Market (I-SEM):*** *It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seek the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes*
- ***RPO 221 Renewable Energy Generation and Transmission Network****: a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network; b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported, The RSES supports the Southern Region as a Carbon Neutral Energy Region.*
- ***RPO 222 Electricity Infrastructure:*** *It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.*

Project Compliance with Regional Planning Policy

The RSES for the Northern and Western Region states that the region has a crucial role to play in Ireland's transition to a low carbon future. It is considered that the provision of the Project would facilitate this just transition and is particularly in line with RPO 4.19 and 4.33 as outlined above. The vast renewable resource of the north and west coast of Ireland and the associated economic and social opportunities are recognised by the RSES. As the only Phase 1 project in the region, the Project represents the largest investment in renewable energy to date and therefore the Project is considered to be in line with Regional Policy which, in turn, supports the achievement of the OREDP.

The RSES for the Southern Region includes similar support for offshore wind development and the connection of renewable energy project to the electricity grid within the county. The Project will assist in meeting the climate goals set out in the RSES by facilitating the transition to a low carbon society.

2.5.3 Local Policy Context

Under Section 293 of the Act, in making a decision on an application for development permission under Section 291, ABP should have regard to the development plan of any coastal planning authority that:

"(i) within whose functional area it is proposed to carry out development to which the application relates, or

(ii) whose functional area adjoins the maritime site to which the application relates,"

The Project is located within the functional area of the Galway and Clare Coastal Planning Authorities. The Offshore Array Area (OAA) is located approximately 5km from the Galway coastline. The OEC runs in a south easterly direction to the Landfall at Killard, Co. Clare and is approximately 63.5km in length. The OGC runs from the OLL to the Moneypoint 220kV Substation, Co. Clare and is approximately 22.3km. As such, the relevant policies and objectives of the development plans of the two relevant coastal planning authorities are outlined in the following sections.

This EIAR also considers elements of the Project for which development permission is not sought, namely the O&M facility and the temporary anchorage of gravity-based foundations. The policy context of the likely location of this infrastructure is also considered below.

2.5.3.1 Galway County Council

Galway County Development Plan 2022 - 2028

The Galway County Development Plan 2022 – 2028 (the GCDP) was adopted by the Elected Members of Galway County Council at the conclusion of the Special Meeting on the 9th of May 2022 and came into effect on the 20th of June 2022.

The policies and objectives set out within the GCDP are supportive of the development of renewable energy off the County's coastline. Climate change is emphasised as one of the greatest global challenges with Galway County Council acknowledging that continual action is needed for Galway to play its role in the transition to a low carbon and climate resilient county. The commitment to transition to a low carbon society in line with the relevant European, national and regional policy set out above is detailed in Policy Objective CC1 – Climate Change, which is as follows:

"Support and facilitate the implementation of European, National and Regional objectives for climate adaptation and mitigation taking into account other provisions of the Plan (including those relating to land use planning, energy, sustainable mobility, flood risk management and drainage) and having regard to the Climate mitigation and adaptation measures."

The GCDP recognises that an efficient and secure energy supply is essential to the future growth and sustainable development of County Galway and Ireland as a whole:

"To reduce the carbon footprint by integrating climate action into the planning system in support of national targets, support indigenous renewable sources in order to reduce dependence on fossil fuels and improve security of supply and the move to a competitive low carbon economy."

The GCDP recognises that, due to population and economic growth, along with the electrification of various sectors, the demand for energy will increase substantially in the coming years. In order to meet electricity demand in a sustainable manner, the Council supports the sustainable growth of renewable energies. The policy objectives relating to the generation of renewable energy, applicable to the Project, are as follows:

- ***RE1 - Renewable Energy Generation and ancillary facilities:*** *To facilitate and support appropriate levels of renewable energy generation and ancillary facilities in the county to meet national, regional and county renewable energy targets, to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy.*
- ***RE2 - Local Authority Renewable Energy Strategy****: The policy objectives and Development Management Standards set out in the Local Authority Renewable*

Energy Strategy for County Galway shall be deemed the policy objectives and development management standards for the purpose of the Galway County Development Plan 2022-2028.

- ***RE 5 – Renewable Energy Strategy:*** *Support and facilitate the sustainable development and the use of appropriate renewable energy resources and associated infrastructure within the County having due regard to the Habitats Directive and to the detailed policy objectives and Development Standards set out in the Local Authority Renewable Energy Strategy.*
  - *Renewable Energy Transmission*
  - *Renewable Energy Generation*
  - *'Strategic Areas' for renewable energy development*
  - *Onshore Wind Energy*
  - *Solar Energy*
  - *Bioenergy/Anaerobic*
  - *Digestion*
  - *Micro-renewables*
  - *Marine Renewables*
  - *Hydro Energy*
  - *Geothermal Energy*
  - *Alternative Technologies*
  - *Energy Efficiency & Conservation*
  - *Sustainable Transport*
  - *Auto production*
  - *Battery Storage*
  - *Repowering/Renewing Wind Energy Developments*
  - *Community Ownership*
- ***RE 7 - Renewable Energy Generation - Transition to a Low Carbon Economy:*** *To facilitate and support appropriate levels of renewable energy generation in County Galway, considering the need to transition to a low carbon economy and to reduce dependency on fossil fuels.*

Chapter 9 of the GCDP details Galway County Council's policy objectives in relation to the management of marine and coastal areas. Policy objectives are included to support the advancement of new technologies and industries while also protecting and supporting the existing marine sectors and uses. First and foremost, the GCDP aims to support the implementation of the NMPF and the marine spatial planning system.

NMPF 1 - **Marine Planning Framework:** To seek to implement the policy objectives as set out within the NMPF to support the effective management of marine activities and more sustainable use of the county's marine resources.

NMPF 2 - Marine Planning and Development Management Bill: To support and accommodate any change to the marine spatial planning system which is proposed under the Marine Planning and Development Management Bill 2019 (or any subsequent Bill) once enacted into law.

The GCDP acknowledges that a key national resource to Ireland is the abundance of offshore energy that can be obtained off the Irish coast. The GCDP supports the exploitation of this resource, in line with the NPF, the NMPF and the OREDP. The GCDP includes a supportive marine renewable energy policy objective, which is detailed below:

MRE 1 - Renewable Energy: Support as appropriate, sustainable offshore renewable energy generation off the County Galway coast subject to environmental and amenity considerations.

The GCDP also supports the marine sector as a source of employment and economic growth. The ocean economy is made up of a range of sectors which includes marine renewable energy. The marine

economy and the development of offshore energy infrastructure is supported by the following policy objective:

MCE 1 - Maritime Economy: To support development and growth of the maritime economy and balance the competing demands for available space along the coast by different users and encourage co-location and co-existence of activities and infrastructure while having regard to appropriate environmental considerations.

Onshore infrastructure, such as ports and harbours, required to enable the development of the marine economy are identified and supported in the GCDP. Ros an Mhíl port, which has been identified as a possible location for the Operation and Maintenance (O&M) base, is specifically identified for expansion in order to fully support the development of the marine economy.

SMT 1 - Marine Potential: To support the marine potential of the county's piers and harbours and related infrastructure and other appropriate marine related development and support the sustainable development of this infrastructure to enable the marine economy to develop.

SMT 2 - Expansion of Ros an Mhíl: To support within the lifetime of this plan the potential of Ros an Mhíl as a port of significance and to ensure its development potential is fully realised in accordance with environmental considerations.

A statement of consistency including all of the relevant policies and objectives from the CDP is provided in the Planning Report which accompanies this EIAR as part of the planning application for the Project.

Galway County Council's Local Authority Renewable Energy Strategy

County Galway's Local Authority Renewable Energy Strategy (LARES) is included as Appendix 1 of the GCDP. The LARES for Galway sets out policies and objectives designed to allow County Galway to both contribute to meeting the national legally binding targets while also capitalising on those opportunities associated with the generation and harnessing of renewable energy in a sustainable manner.

The LARES acknowledges the vast potential for the development of renewable energy of the Galway coastline. This includes the development of offshore wind energy, tidal, wave, and ocean thermocline energy. The LARES also recognises the need for the development of onshore infrastructure that will allow the marine renewables sector to develop. The LARES considers land-based infrastructure such as the transmission network and port infrastructure to facilitate maintenance and repair in Ros an Mhíl and the Port of Galway. The LARES also acknowledges the findings of the OREDP, it states the following:

"It is .... evidenced by the [OREDP] 2014 which identifies Area 5 (the area in which County Galway is located) as an area with a marine renewable potential of 18,500- 19,500 Megawatts (MW). Given the technological improvements that have occurred in the marine renewables industry since 2014, it is likely that this is an underestimation of the actual marine renewable potential for this area."

It is noted within the LARES that Galway County Council cannot actively develop marine renewables in the marine areas because the *"the County's jurisdiction ends at the High Water Mark"*. This would suggest that the mapping and development management standards within the LARES is only applicable to terrestrial renewable energy projects and not the proposed Offshore Site, which, at the time of drafting of the LARES, was located outside the functional area of Galway County Council. This point is reiterated again in the Council's estimation of potential renewable energy contributions in County Galway by 2030 (Table 12, pg. 78). Under offshore wind energy, no estimated MW contribution is made, and it is stated that this is due the fact that *'this* (renewable energy type) *lies outside the jurisdiction of GCC'.*

However, Appendix E (Informative Maps) of the LARES does include offshore characteristics on the sieve mapping analysis including bathymetry, wind speed, and ecologically designated sites which appear to inform Map 13 of the LARES (Wind Potential). On the wind potential map, the vast majority of the OAA is located within an area classified as '*Open to Consideration'*. The wind energy classification of the offshore area appears to directly correlate to the Bathymetry and Natura 2000 sites maps set out in Appendix E of the LARES, reproduced in Figure 2-5 and Figure 2-6 below for ease of reference. The wind energy classification at the OAA is based on the bathymetry of the maritime area off the Co. Galway coast. The maritime area where water depth is greater than 60m are considered to be *'Generally to be Discouraged'* while the maritime area that is between below 60m and are outside of Figure 2-7 below shows the LARES Wind Potential map with the Offshore Site overlaid.

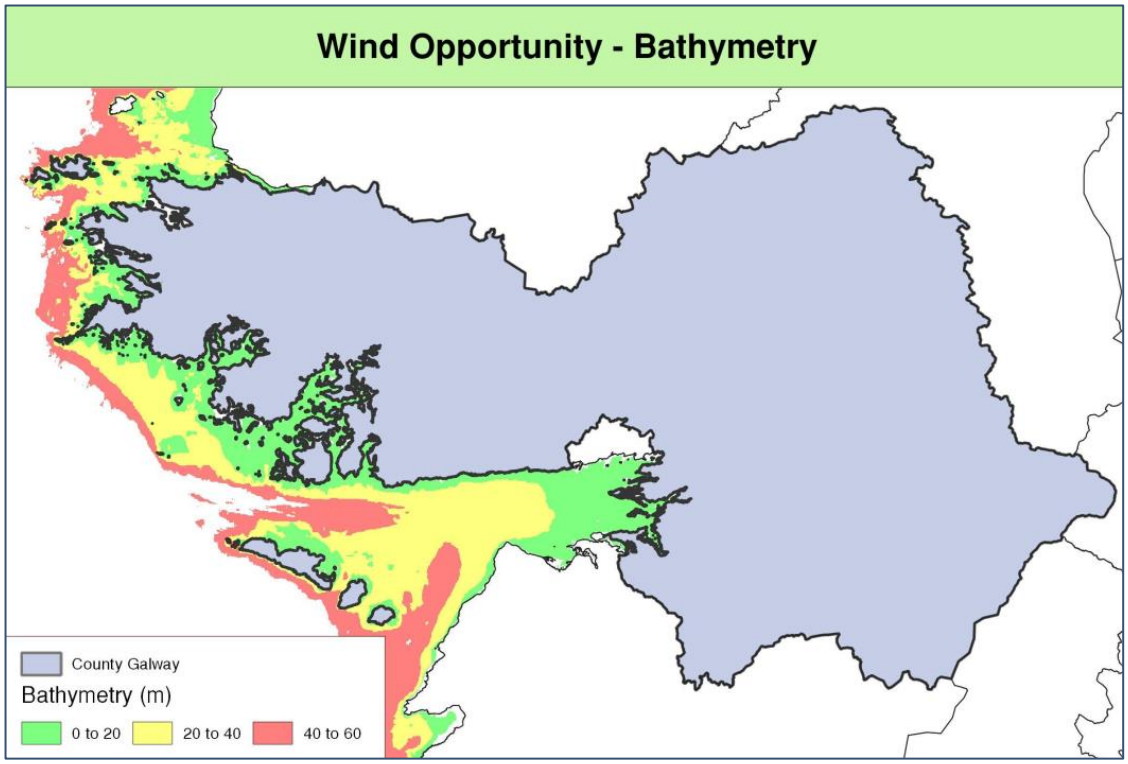

Figure 2-5: Wind Opportunity Bathymetry Map (GCC LARES, Appendix E)

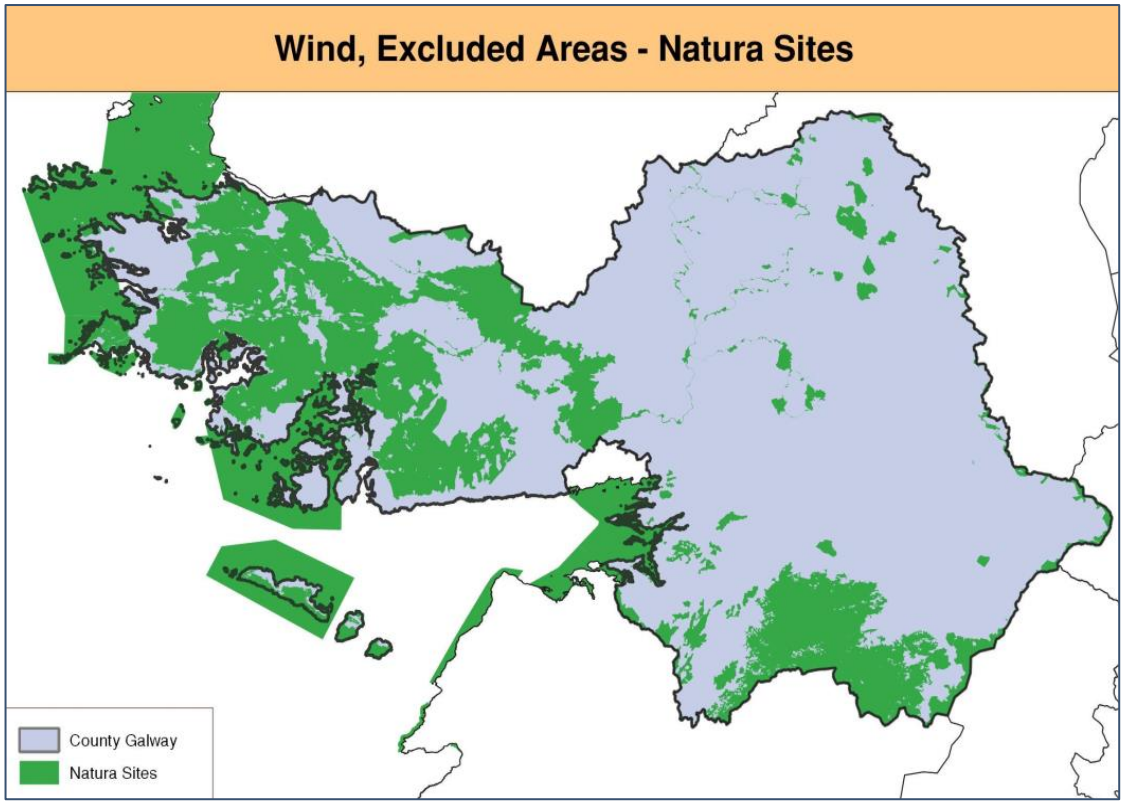

Figure 2-6: Excluded Natura 2000 Sites (GCC LARES, Appendix E)

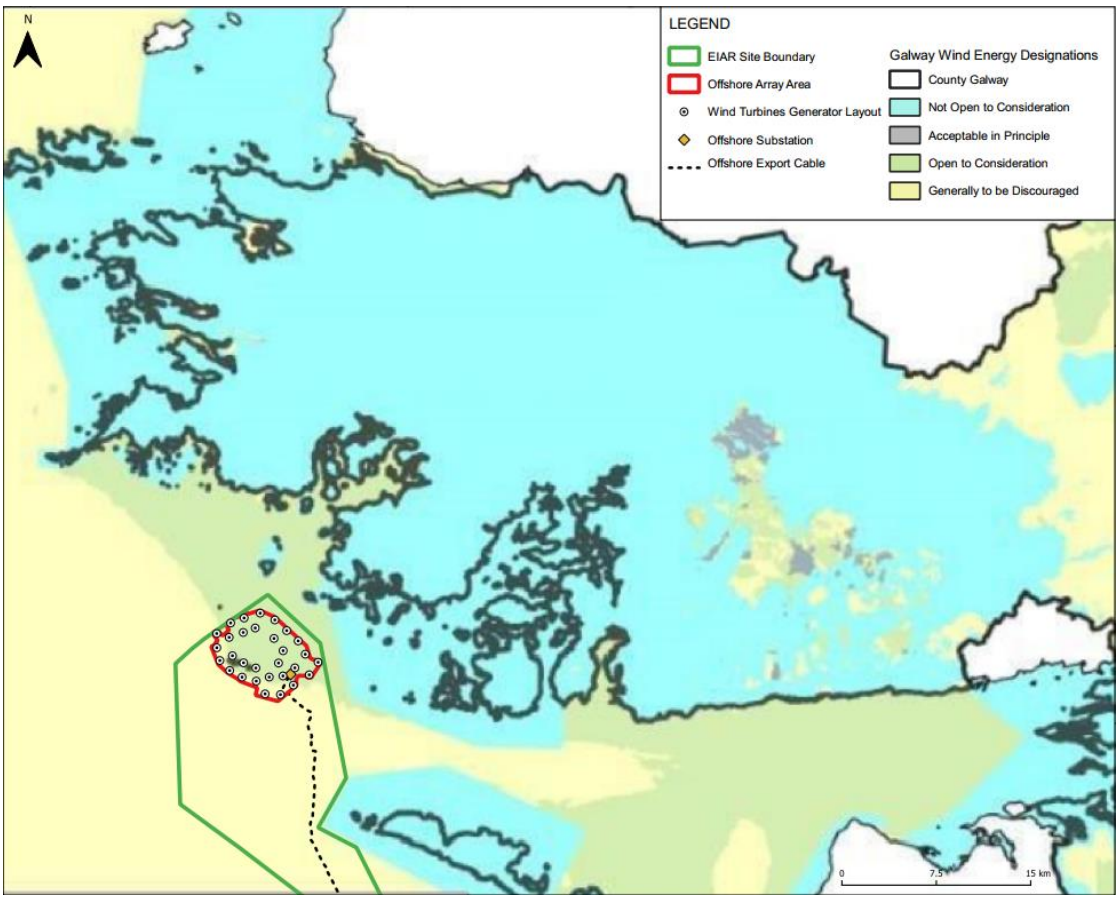

Figure 2-7: Offshore Site overlaid on LARES Wind Potential Map

The LARES does support the development of marine renewable energy and its associated onshore infrastructure in a sustainable manner. The LARES includes three policy objectives in relation to the Marine Renewables:

LARES Policy Objective 29

"Marine Renewable Energy: Support the ambition to harness our ocean wealth in a sustainable manner and to engage with all relevant coastal and marine stakeholders."

LARES Policy Objective 30

"Supporting Infrastructure: Strategically located port facilities and land- based supporting infrastructure will be facilitated where appropriate, and in accordance with the LARES and the proper planning and sustainable development of the area."

LARES Policy Objective 31

"Protection of Marine Environment: Onshore marine renewable infrastructure will generally be discouraged in areas of high ecological and environmental value in recognition of the ecosystem services derived from such natural capital."

Having regard to the above, it is considered that the Project is consistent with the LARES and that the LARES for Galway is supportive of the Project in principle.

Galway County Council Landscape Policy

Galway County Council have prepared a Landscape Character Assessment (LCA) that is contained in *Appendix 4* of the GCDP. This Landscape Character Assessment categorises Galway County into different Landscape Character Types (LCTs). The OAA located within Coastal Landscape.

Within the LCTs, County Galway is further divided into Landscape Character Units (LCUs). The OAA is located in Connemara Coastal Islands. The Landscape Character Assessment (LCA) also identifies protected views and scenic routes *"of great natural beauty located across the county".*

At a high level, County Galway is divided into 4 landscape regions, the West Galway Region, the Eastern Plains, the South Galway Region and the Coast, under which the Project falls. The Coast Region covers the islands and coastal waters of Galway. Areas of coastal water derive their character from their proximity and interactions with terrestrial areas. The Coast Region, its features and its interaction with the land is set out under the 'Seascapes' section of the LCA.

A 'seascape' as defined by the LCA is 'the coastal landscape and adjoining areas of open water, including views from land to sea, from sea to land and along the coastline'. Seascapes are made up of 5 main types, depending on the relationship between the land and sea. These seascape types are detailed in Table 2-4 below.

Seascape Type	Description
Fully Enclosed Coast	"This Seascape type includes shorelines that are adjacent to marine or transitional water but have no view of the ocean horizon. Landscape Character of adjoining lands will be dominant. Sea loughs are common throughout Atlantic Galway."

Semi-enclosed Coast	"This Seascape type includes shorelines that are adjacent to marine or transitional water which have no more than a 50% view ocean horizon."
Open Coast	"This Seascape type includes all sea areas for a distance of up to 5km off shore with a view which is at least 50% ocean horizon. Views from these waters will feel that the land is the dominant feature."
Offshore	"This Seascape type includes all water between the edge of the Open Coastal Waters boundary (5km from the shore) and the Open Sea boundary (20km from the shore). Views from these waters will feel that the sea is the dominant feature.

Table 2-4: LCA Seascape Types and Definitions

The Project's OAA in the is located between 5km and 11.5km off the Galway coast and is therefore straddles the boundary between the *'Open Coast'* and '*Offshore*' seascape type. Each seascape type is assigned a '*seascape sensitivity'*. The offshore seascape type is not prescribed any sensitivity in the LCA, suggesting that development in the offshore seascape it is less affected by visual impacts due to its distance from land receptors.

The terrestrial LCT most relevant to the Project are the 'Coastal Landscape' covering the Connemara coastline and northern side of Galway Bay with the 'Uplands and Bog Landscape' further inland. The other relevant LCT is 'Island Landscape' covering the Aran Islands. The most relevant landscape objectives and policies relating to the terrestrial LCT's are provided in Table 2-5 below.

Table 2-5: LCT Policies and Objectives

Policy Objective	Description
LCM 1 - Preservation of Landscape Character	Preserve and enhance the character of the landscape where, and to the extent that, in the opinion of the Planning Authority, the proper planning and sustainable development of the area requires it, including the preservation and enhancement, where possible of views and prospects and the amenities of places and features of natural beauty or interest.
LCM 2 - Landscape Sensitivity Classification	The Planning Authority shall have regard to the landscape sensitivity classification of sites in the consideration of any significant development proposals and, where necessary, require a Landscape/Visual Impact Assessment to accompany such proposals. This shall be balanced against the need to develop key strategic infrastructure to meet the strategic aims of the plan.
LCM 3 - Landscape Sensitivity Ratings	Consideration of landscape sensitivity ratings shall be an important factor in determining development uses in areas of the County. In areas of high landscape sensitivity, the design and the choice of location of proposed development in the landscape will also be critical considerations
PVSR 1 – Protected Views and Scenic Routes	Preserve the protected views and scenic routes as detailed in Maps 8.3 and 8.4 from development that in the view of the Planning Authority would negatively impact on said protected views and scenic routes. This shall be balanced against the need to develop key infrastructure to meet the strategic aims of the plan

It should be noted that under LCM 2 and PVSR 1, the GCDP notes that the implementation of these policies and objectives *'shall be balanced against the need to develop key strategic infrastructure to*

meet the strategic aims of the plan'. The key strategic aims relevant in this regard, outlined in *Chapter 14 - Climate Change, Energy and Renewable Resource* of the GCDP, are as follows:

- 'To reduce the County's CO2 emissions by achieving international, national, regional and any local targets for achieving a low carbon economy by 2050; and increase energy efficiency in Local Authority activities through its development management functions'
- 'To reduce County Galway's dependency on imported fossil fuels and to provide alternative energy sources by harnessing the County's potential for renewable energy sources while strengthening the grid transmission networks'

The achievement of the strategic aims above are dependent on the development of renewable energy projects. Local and national level renewable energy policy should therefore be considered when balancing the landscape and visual impact and the strategic need for renewable energy development.

Further assessment of the Project on landscape receptors, including the assessment of the Project on protected views and scenic routes is provided in Chapter 16 – Seascape, Landscape and Visual Impact Assessment.

County Galway Tourism Strategy 23-31

The County Galway Tourism Strategy provides a framework for the development of sustainable tourism across County Galway. The strategy is built around 4 strategic focus areas which are outlined below.

1. Destination Management
2. Experience Development
3. Capacity and Skills Development
4. Marketing and Communications

The delivery of the Strategy will be guided by 10 key principles to ensure that actions as a result of the strategy are sustainable. Relevant to the Project is Principle 3, which states:

'Prioritising the goal of fully sustainable tourism and aligning with national and local Climate Action Plans'

Six development zones have also been identified, based on the maturity, sustainability, assets and industry and community capacity. The Project straddles the boundary of Zone 5, the 'South Conamara Gaeltacht' and Zone 6, 'West Connemara'. Zone 5 and 6 are both considered to be a 'Progressing Destination', while certain areas of Zones 5 and 6 are acknowledged for their well-developed tourism industry, such as the Arran Islands and Clifden.

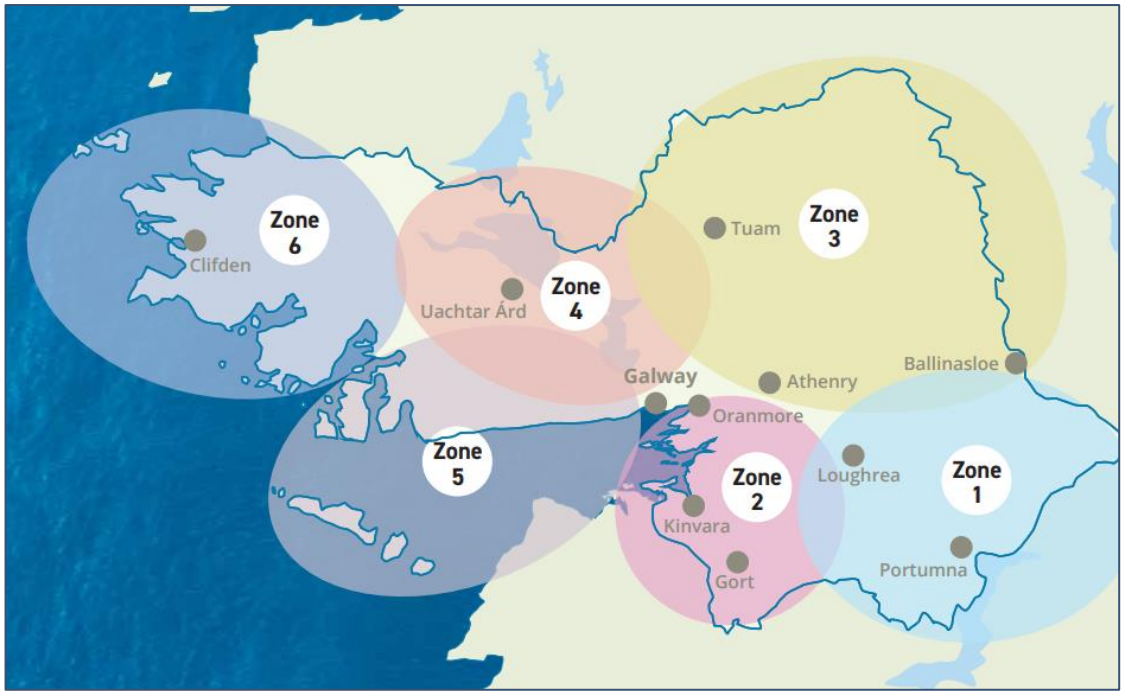

Figure 2-8: Zone 5 - South Conamara Gaeltacht (County Galway Tourism Strategy 23-31)

Project Compliance with Galway County Development Plan

The Project is in compliance with and strongly supported by the policy objectives of the GCDP. First and foremost, the GCDP aims to transition to a low-carbon society through the implementation and facilitation of European, national and regional plans and policies. The Project will generate approximately 450MW of clean, renewable energy contributing towards a clean energy future for County Galway and Ireland as a whole. The principle of renewable energy in the marine area is supported by policy objective MRE 1 and by LARES Policy Objective 29. The GCDP also includes policy support for the associated infrastructure necessary to the facilitate the development of marine renewables, namely policy objective SMT 1 - Marine Potential and LARES Policy Objective 30.

2.5.3.2 Clare County Council

Clare County Development Plan 2023 – 2029

The Clare County Development Plan 2023 – 2029 (CCDP) was formally adopted by Elected Members of Clare County Council on March 9th, 2023. The CCDP officially came into effect on April 20th, 2023, 6 weeks later. The CCDP provides overall guidance for the proper planning and development of County Clare through policies and objectives.

The CCDP recognises its position in supporting the delivery of meaningful action on climate change. Climate action is thus an important strategic objective of the CDP, with aims to achieve decarbonisation and climate resilience as a county. This has been reflected in Chapter 2 - Climate Action of the CCDP, in addition to other climate action and renewable energy related objectives introduced throughout the Plan.

The significance of climate change and the need for continued support / investment within renewable energy generation as part of the county's adaption strategy is captured within the strategic goal of the CCDP's Climate Action Chapter:

> *Goal I: A county that is resilient to climate change, plans for and adapts to climate change and flood risk, is the national leader in renewable energy generation, facilitates a low carbon*

future, supports energy efficiency and conservation and enables the decarbonisation of our lifestyles and economy.

The CCDP also includes several relevant climate policies and objectives which currently support the implementation of national climate policy and adaption and mitigation measures in the county.

CDP2.1 Climate Action:

It is an objective of Clare County Council:

a) To support the implementation of the National Climate Action Plan 2023 and the National Climate Change Adaptation Framework (and any subsequent versions thereof), and to work with the Regional Climate Action Offices to enable County Clare to transition to a low carbon and climate resilient county.
b) To adopt sustainable planning strategies through integrating land use and transportation and by facilitating mixed use developments as a means of supporting national targets of climate policy mitigation and adaptation objectives, and reducing our carbon footprint and greenhouse gas emissions; and
c) To raise awareness and understanding of the impacts of climate change on both the local economy and communities in the county, and the ways communities can increase their response and grow their resilience to these impacts.

The relevant objectives of CDP2.2 Climate Change Mitigation, Adaption and resilience are outlined below:

It is an objective of the Clare County Council:

a) To support the implementation of the Clare Climate Change Adaptation Strategy 2019-2024 (and any subsequent versions);
b) To promote measures that build resilience to climate change to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning;
c) To raise awareness of issues relating to climate change and climate change adaptation during the lifetime of this plan;
d) To liaise, collaborate and work in partnership with the relevant government approved sectors in relation to initiatives and activities across the county;
f) To facilitate and support the relevant stakeholders and enterprises in the progression of advancements in climate adaptation solutions and renewable energy generation and technologies.

The CCDP acknowledges the strengths of the energy network in County Clare and envisions the County accommodating significant further generating activity. The economic benefits of the expansion of the renewable energy sector are recognised, with the redevelopment of the Moneypoint 220kV Substation earmarked as a focal point for the development of the offshore wind energy industry. The council's policy in relation to the energy security, energy supply and the development of Moneypoint 220kV Substation are outlined below:

Energy Security CDP11.44

It is an objective of Clare County Council:

To promote and facilitate the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure, to integrate renewable energy sources, thereby creating a secure and efficient energy supply and storage system for County Clare which is ready to meet increased demand as the regional economy grows.

Energy Supply CDP6.17

It is an objective of Clare County Council:

a) To contribute to the economic development and enhanced employment opportunities in the county by:
   i. Enabling the development of a self-sustaining, secure, reliable and efficient renewable energy supply and storage for the County in line with CDP Objective 3.3;
   ii. Facilitating the county to become a leader in the production of sustainable and renewable energy for national and international consumption through research, technology development and innovation; and
   iii. Supporting on-land and off-shore renewable energy production by a range of appropriate technologies in line with CDP Objective 3.3.

Objective (iii) directly supports the development of offshore renewable energy production. CDP Objective 3.3 refers to the CCDP requirement for development to comply with the objectives and requirements of the Habitats, Birds, Water Framework and all other EU directives. The Project, as demonstrated by this EIAR and accompanying NIS, is in compliance with the objectives of CDP 3.3. The relevant objectives of CDP Objective 3.3 are outlined below.

Appropriate Assessment, Strategic Environmental Assessment and Strategic Flood Risk Assessment CDP3.3

It is an objective of the Clare County Council:

a) To require compliance with the objectives and requirements of the Habitats Directive, specifically Article 6(3) and where necessary 6(4), Birds, Water Framework, and all other relevant EU Directives and all relevant transposing national legislation;
b) To require project planning to be fully informed by ecological and environmental constraints at the earliest stage of project development and any necessary assessment to be undertaken, including assessments of disturbance to species, where required together with the preparation of both statutory and non-Statutory Ecological Impact Assessments (EcIA);
c) To protect, manage and enhance ecological connectivity and improve the coherence of the Natura 2000 Network;
d) To require all proposals to ensure there is 'no net loss' of biodiversity within developments;
e) To ensure that European sites and Natural Heritage Areas (designated proposed NHAs) are appropriately protected;
f) To require the preparation and assessment of all plans and projects to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report contained in Volume 10 of this development plan; and
g) To require compliance with the objectives of the Water Framework Directive and support the implementation of the 3rd Cycle River Basin Management Plan (and any other iteration during the lifetime of the plan).

Policy c) of CDP12.6 below is of particular relevance to the Project, the policy supports energy uses on lands adjacent to the Moneypoint 220kV Substation, such as the OCC at lands in the townland of Ballymacrinan nearby the Moneypoint 220kV Substation. The OCC is situated outside of Strategic Development Location B (SDL); however, the onshore export cable traverses the SDL en route to its connection point at Moneypoint 220kV Substation. The Moneypoint SDL mitigation measures are considered within chapters X of this EIAR, in line with the requirements of policy e) below.

Strategic Development Location B – Moneypoint CDP12.6

It is an objective of Clare County Council:

a) To safeguard the role and function of Strategic Development Location B – Moneypoint as a key strategic driver of economic growth in the country, facilitating its sustainable growth, operational expansion and diversification, in accordance with national and regional energy objectives.
b) To support the redevelopment of the Moneypoint power generation station site as a green energy hub and the development of the Shannon Estuary as a focal point for the offshore wind industry in Europe.
c) To support and facilitate the development of marine related industry on lands adjacent to Moneypoint which is compatible with the primary use of the SDL as a Strategic Energy Location.
d) To ensure that all proposed developments shall be in accordance with the Birds and Habitats Directive, Water Framework Directive and all other relevant EC Directives.
e) To ensure that all proposed development at Strategic Development Location B shall incorporate the Mitigation Measures as contained in the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary (Volume 9 of this plan) for ensuring the integrity of the Natura 2000 Network.

The CCDP includes support for the development of renewable energy projects that contribute towards the achievement of national climate and energy targets. Under part c) of CDP 11.47, the CCDP specifically supports the development of renewable wind energy, both onshore and offshore at appropriate locations and of its related grid infrastructure in County Clare.

The relevant objectives of CDP 11.47 Renewable Energy are outlined below:

It is an objective of the Development Plan:

a) To encourage and to favourably consider proposals for renewable energy developments, including community owned developments, and ancillary facilities in order to meet National, Regional and County renewable energy targets, and to facilitate a reduction in CO2 emissions and the promotion of a low carbon economy;
c) To support the sustainable development of renewable wind energy (on-shore and offshore) at appropriate locations and of its related grid infrastructure in County Clare, in accordance with all relevant policies, guidance and guidelines pertaining to the protection of the environment and protected habitats and species, and to assess proposals having regard to the Clare Wind Energy Strategy in Volume 6 of this plan and the associated SEA and AA, or any subsequent updated adopted Strategy and to national Wind Energy Guidelines;
f) To support and facilitate the development of new options and technological advances in relation to renewable energy production and storage, that may emerge over the lifetime of this Plan;
g) To support the integration of indigenous renewable energy production and grid injection;
h) To ensure that all proposals for renewable energy developments and ancillary facilities in the County are in full compliance with the requirements of the SEA and Habitats Directives and Objective CDP3.3 of this plan; and
i) To promote and market the County as a leader of renewable energy provision.

Chapter 13 of the CCDP sets out the policy objectives for the marine and coastal areas. The overarching objective of the chapter is to *'develop and manage marine, coastal and island resources so as to achieve maximum benefits for the people of the County whilst having minimum impacts on the environment.'* Taking the recent policy and legislative developments into account, such as the NMPF and the Maritime Area Planning Act (2021), Clare County Council sets out the following objective in relation to maritime spatial planning.

The relevant objectives of CDP 13.3 Maritime Spatial Planning are outlined below:

It is an objective of the Development Plan:

a) To ensure consistency and alignment between land based spatial planning and marine planning which supports the protection of the marine environment and the growth of the marine economy;
b) To support appropriate land-based infrastructure which facilitates marine activity (and vice versa).
c) To ensure all new activities/developments are consistent with the policies of the NMPF.

The Project is further supported by policy *CDP 13.5* which supports offshore wind energy developments and their associated land-based infrastructure and service requirements, subject to environmental considerations.

Offshore Renewable Energy (ORE) Development CDP 13.5

It is an objective of Clare County Council:

a) To support offshore wind, wave and tidal renewable energy developments and the ancillary land-based infrastructure and service requirements to assist in meeting renewable energy targets subject to environmental considerations and the protection of the amenities of the surrounding areas in accordance with the OREDP, the ORE Planning policies as outlined in the NMPF and SIFP SEA Environmental Reports and the Natura Impact Reports; and
b) To support the redevelopment of the Moneypoint power generation station site as a green energy hub and the development of the Shannon Estuary as a focal point for the offshore wind industry in Europe.

The main element of the Project located within the functional area of Clare County Council is the onshore 220kV grid connection and OCC at Ballymacrinan Co. Clare. The CCDP supports and facilitates the development of the electricity network, particularly projects connecting renewable energy sources to the national grid.

The policy objectives of CDP 11.45 Electricity Networks relevant to the Project are outlined below:

It is an objective of Clare County Council:

a) To facilitate improvements in energy infrastructure and encourage the expansion of the infrastructure within the County;
b) To facilitate future alternative renewable energy developments and associated utility infrastructure throughout the County;
f) To have regard to environmental and visual considerations in the assessment of developments of this nature and ensure compliance with the environmental requirements of Objective CDP3.3 of this plan.

The CCDP supports the development of the Shannon Foynes Port, the wider vicinity of which has been identified as a potentially suitable location for the temporary anchorage of WTG components during the construction phase of the Project, which is assessed as part of this EIAR. It should be noted that development permission for any works relating to temporary anchorage is not sought as part of this application.

Shannon Foynes Port CDP 11.23

It is an objective of Clare County Council:

a) To support the continued expansion of Shannon Foynes Port in compliance with the environmental requirements of objective CDP 3.3 as it applies to County Clare;
b) To support the capital infrastructure projects in the Shannon-Foynes Port Company Infrastructure Development Programme; and,
c) To support Shannon Foynes Port Company Vision 2041 masterplan.

A statement of consistency including all the of the relevant policies and objectives from the CCDP is provided in Appendix 2 of the Planning Report which accompanies this EIAR as part of the planning application for the Project.

Clare Renewable Energy Strategy

The Renewable Energy Strategy (RES) is included in Volume 5 of the CCDP. The RES vision is to position County Clare as the "national leader in renewable energy generation which supports energy efficiency and conservation, and which achieves balanced social and economic development throughout the County and assists in achieving national climate change mitigation targets."

The RES primarily focuses on putting a framework in place to guide the development of onshore renewable energy projects, however it does include a chapter that deals with marine renewables. The aim of the Marine Renewables chapter in the RES is to profile offshore renewable energy types, clarify Clare County Council's role in relation to the development of the industry, and to set out the policies and objectives to assist the development of the industry.

The role of Clare County Council is primarily related to the onshore elements of offshore renewable energy projects, as the Council's jurisdiction only extends as far as the nearshore area. The RES recognises the crucial nature of this role for the development of the marine renewables sector. With this considered the RES sets out objectives and targets (detailed in Table 2-6 below).

Table 2-6: Relevant Objectives and Targets set out by the Clare Renewable Energy Strategy

Policy Reference	Policy Objective
RES 9.1 Support the National Marine Planning Framework	It is an objective of Clare County Council: a) To implement and support the streamlined consent system, connection arrangements, and the funding supports for new technologies offshore. b) To promote regional cooperation in terms of offshore renewable energy development, environmental monitoring and awareness of the benefits of realising the Regions' offshore energy potential.
RES 9.2 Facilitate the development of Marine Renewables	It is an objective of Clare County Council: a) To support the ocean energy research, development and demonstration pathway for emerging marine technologies (wave, tidal, floating wind) and associated test infrastructure. b) To support the sustainable development of offshore wind energy at appropriate locations and related grid infrastructure. c) To maximise the opportunities provided by the Shannon Estuary's strategic location and its' deep water for marine renewable energy development.
RES 9.3 Strategic Marine Energy Infrastructural Development	It is an objective of Clare County Council:

	a) To work in partnership with the marine renewable energy sector (wave, tidal and offshore), DECC, EirGrid and other relevant stakeholders to deliver the key actions recommended by the [OREDP] and DS3 Programme, ensuring that electricity generated off the coast of County Clare can be exported to the demand market subject to the requirements of all environmental legislation, and taking into account the OREDP SEA Environmental Report and the Natura Impact Report. b) To support the strengthening of the electricity grid to accommodate offshore renewable energy and its connection to the national grid. c) To enable facilities on shore to convert renewable energy generated offshore to be transformed, stored, converted and transported effectively.
RES 9.4 Marine Energy Service and Port Infrastructure	It is an objective of Clare County Council: a) To actively explore and pursue opportunities to service the marine renewable energy sector at existing ports, to facilitate the growth of new ports, supporting infrastructure and associated development, in compliance with the Strategic Integrated Framework Plan for the Shannon Estuary and any future coastal zone management plans. b) To facilitate the expansion of ports and provision of additional quayside harbour working areas and /or additional quay length to further enhance their attractiveness to marine renewable industry developers.
RES 9.6 Forward Planning for Offshore Energy	It is an objective of Clare County Council: To carry our feasibility studies and other forward planning initiatives to enable offshore renewable energy to develop while protecting the environment, maximising local economic and social benefit, and enabling efficient development of supporting infrastructure. This will be done in co-operation with relevant government departments and public agencies.

The Clare Wind Energy Strategy (WES) was prepared as part of the 2011 – 2017 CCDP. Due to government circular PL.20.13 the plan was carried over unchanged into the CCDP 2023-2029. The WES relates to onshore wind energy only and therefore has not been considered further.

Strategic Integrated Framework Plan for the Shannon Estuary

Volume 7 of the CCDP contains the Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary. The SIFP is an inter-jurisdictional land and marine based framework to guide the development and management of the Shannon Estuary. Key Objectives, relevant to the Project, include:

SIFP MRI 1.2 General Considerations
To permit sustainable proposals for marine related industry within the Strategic Development Locations identified in Figures 5.2A and 5.2B Volume III, subject to compliance with:

- The individual development objectives outlined in this Plan for the Strategic Development Locations;
- The objectives and requirements of the Habitats Directive specifically Article 6(3) and where necessary 6(4), Birds, Water Framework, and all other relevant EU Directives;
- All relevant principles of proper planning, flood risk, sustainability and environmental considerations, including the mitigation measures referenced in this Plan (Volume II Appendices).

SIFP MRI 1.2.2: Moneypoint Strategic Energy Location
To safeguard the role and function of ESB Moneypoint as a key strategic driver of economic growth in the Region, encouraging its sustainable growth, operational expansion and diversification in accordance with national and regional energy objectives.

SIFP MRI 1.2.3 Moneypoint Marine Related Industry
To support and facilitate the development of marine related industry on lands adjacent to Moneypoint, which is compatible with the primary use of this SDL, as a Strategic Energy Location, subject to compliance with the criteria in SIFP MRI 1.2.

SIFP OS RE 1.10: Servicing the renewable sector
To actively explore and pursue opportunities to service the renewable energy sector at existing ports, and to facilitate associated development required, subject to compliance with sustainable planning, and the requirements of the Habitats & Birds Directive, Water Framework Directive, and all other relevant EU Directives.

SIFP ERGI 1.5: Electricity Network
To support and facilitate the sustainable development, upgrade and expansion of the electricity network, transmission, storage and distribution infrastructure ensuring that all such developments comply with the requirements of the Habitats & Birds Directives, Water Framework Directive, and all other EC Directives.

SIFP ERGI 1.7: Connecting renewable energy sources
To facilitate sustainable infrastructure connections to wind farms and other renewable energy sources, subject to proper assessment of visual impact, impact on protected landscapes, heritage and conservation interests.

Project Compliance with the Clare County Development Plan

The Project is in compliance with and strongly supported by the policy objectives of the CCDP. County Clare's ambition to become a *'national leader in renewable energy generation'* demonstrates clear ambition and support for the facilitation of renewable energy projects in the County. Offshore renewable energy developments and their associated land-based infrastructure are supported by policy objective 'CDP 13.5 - Offshore Renewable Energy (ORE) Development'. The Moneypoint 220kV Substation is identified by the CCDP for development as a green infrastructure hub, with specific support for marine related industry on lands adjacent to the Moneypoint 220kV Substation. With the above policies considered, it is evident that the Project is supported by the policy objectives in the CCDP.

2.5.3.3 Limerick County Council

The area in the wider vicinity of Shannon Foynes port has been identified as a potentially suitable location for the temporary anchorage of WTG components during the construction phase of the Project. Temporary anchorage of WTG components in the vicinity of Shannon Foynes port is assessed as part of the EIAR and therefore the relevant local policy context is described below. It should be noted that development permission for any works relating to temporary anchorage is not sought as part of this application.

The policy objectives below from the Limerick County Development Plan 2022 – 2028 are relevant to the Project.

Objective ECON O55 Marine Economy

It is an objective of the Council to:

a) Encourage, facilitate and promote the Shannon Estuary's economic growth potential and promote marine related industrial development, while ensuring that the environment and natural resources of the area are protected, managed and enhanced.
b) Facilitate and encourage the environmentally sustainable development of maritime industries at appropriate locations within the Shannon Estuary.

Objective ECON O58 Shannon Foynes Port

It is an objective of the Council to:

a) Support the expansion of the Port at Foynes and promote the economic and industrial development of the Shannon Estuary as a strategic transport, energy and logistics Hub, serving Limerick and the wider region by utilising naturally occurring deep water characteristics and by identifying and safeguarding existing and future strategic transportation links, subject to fulfilling the requirements of the Habitats Directive and the conservation objectives of the Lower River Shannon SAC site.
b) Promote and support Shannon Foynes Port Company's Masterplan Vision 2041.

Objective ECON O59 Offshore Renewable Energy

It is an objective of the Council to:

a) Support in conjunction with other relevant agencies, wind energy initiatives, both on-shore and offshore and wave energy, when these are undertaken in an environmentally acceptable manner.
b) Promote Limerick to become the primary hub for the development of Ireland's west coast renewable energy, with potential in research, innovation, logistics, development, maintenance and administration.

Shannon Foynes Port Company – Vision 2041

The Shannon Foynes Port Company (SFPC) published a strategic plan called 'Vision 2041' in February 2013. The plan aimed to develop the ports infrastructure to capitalise on its strategic location on the Shannon Estuary. A strategic review of the plan was undertaken in September 2022, which reassess the landscape in which the port finds itself, with consideration for the obligations and challenges associated with climate action. The first driver for change is the need to deliver offshore wind energy at scale.

The strategic plan envisions the following infrastructure being developed at Shannon Foynes Port:

- Offshore wind turbine integration pre-commissioning at Foynes Deepwater Port
- Wet storage facilities along the Shannon Estuary
- O&M base at the Port of Foynes.

It is anticipated that the Project will utilise the temporary anchorage facilities designated for development under the Vision 2041 strategic plan. The implementation of the vision 2041 plan is directly supported by Objective ECON O58 (b) of the Limerick County Development Plan 2022 – 2028.

2.5.4 Other Relevant Material Considerations

DoEHLG Wind Energy Development Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published '*Wind Energy Development Guidelines for Planning Authorities'* (the Guidelines) under Section 28 of the Planning and Development Act, 2000 (as amended). The aim of these guidelines was to assist the proper planning of onshore wind power projects in Ireland. The Guidelines highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for **onshore** wind energy development through the development plan process and in determining applications for planning permission. As such, the Guidelines do not apply to the Offshore Site.

In relation to the Onshore Site of the Project, the relevant considerations under the Guidelines have been taken into account during the design stage. The electrical cabling between the turbines and the connection to the national electricity grid at Moneypoint 220kV Substation is entirely below ground, in line with Section 6.11.3 of the Guidelines which states that *"Power line connections between turbines and from turbines to the control building should be underground"*. The OCC has been designed with regard for the recommended siting, layout, and design for substation compounds in the Guidelines as set below.

"The development should incorporate colour harmony and adequate screening of the control building and substation compound. Should the surrounding landscape include trees and/or shrubs, such material can be used for screening. In sensitive landscapes, consideration should be given to screening the control buildings and compound by earth berms as well as re-sodding with local vegetation in order to mitigate their visual impact. The control building, where practicable, should be located in a dip or a hollow but away from ecologically sensitive areas or features. In the case of coastal locations, it should not be located on promontories, unless comprising a special design appropriate to the setting."

Draft Revised Wind Energy Development Guidelines 2019

The '*Wind Energy Development Guidelines for Planning Authorities'* (DoEHLG, 2006) were the subject of a targeted review, and proposed changes were outlined in the document Draft Wind Energy Development Guidelines (December 2019). At time of writing, the Draft Guidelines have not yet been adopted, and the relevant guidelines remain those issued in 2006. Furthermore, the Draft Guidelines state that *"these guidelines relate solely to land use and environmental issues related to on-shore wind energy and do not deal with issues concerning purchasing agreements, matters relating to grid capacity or off-shore wind energy"*. As such, the Draft Guidelines are not considered further.

IWEA Best Practice Principles in Community Engagement and Community Commitments 2013

IWEA (now WEI) published Best Practice Principles in Community Engagement and Commitment in 2013. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits. Further details on the community engagement that has been undertaken as part of the Project are presented below.

DCCAE Code of Practice for Wind Energy Development Ireland – Guidelines for Community Engagement 2016

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) (as it then was) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

Offshore Connection Policy – Offshore Phase 1 Projects Grid Connection & Charging

The Commission for Regulation of Utilities (CRU) decision paper outlines the regulatory framework and policies for grid connection and charging for Phase 1 offshore renewable energy projects in Ireland. This decision supports the government's target of connecting at least 5GW of offshore renewable energy to the grid by 2030. The document specifies that existing onshore connection policies will largely apply to offshore projects, with necessary updates to reflect the unique aspects of offshore connections. Key decisions include the methodology for connection charges, the validity and conditionality of Full Connection Offers, and the detailed information required in Grid Connection Assessments. The CRU's decisions provided a clear pathway for Phase 1 projects to secure grid connections, participate in the Offshore Renewable Electricity Support Scheme (ORESS 1), and ultimately contribute to Ireland's renewable energy targets.

Offshore Renewable Electricity Support Scheme

The Renewable Electricity Support Scheme (RESS) provides support to renewable electricity projects in Ireland. With a primary focus on cost effectiveness, the RESS delivers a broader range of policy objectives, including:

- Providing an Enabling Framework for Community Participation through the provision of pathways and supports for communities to participate in renewable energy projects
- Increasing technology diversity by broadening the renewable electricity technology mix
- Delivering an ambitious renewable electricity policy to 2030
- Increasing energy security, energy sustainability and ensuring the cost effectiveness of energy policy

The Offshore Renewable Electricity Support Scheme (ORESS 1) was the first offshore auction in Ireland. Six offshore wind energy projects qualified to participate in ORESS 1. Four of the six eligible offshore wind energy projects were successful in the auction process, one of which is the Project. The weighted average strike price of €86.05/MWh was lower than expected, below the subsequent onshore Renewable Energy Support Scheme 3 (RESS3), which had a weighted average strike price of €100.47/MWh and the later RESS4 which had a weighted average strike price of € 96.85. In total, 3.1 GW were awarded in ORESS 1, making it the largest renewable energy auction in Ireland to date.

Guidance on EIS and NIS Preparation for Offshore Renewable Energy Projects (Department of Communications, Climate Action and Environment, 2017)

The '*Guidance on EIS and NIS Preparation for Offshore Renewable Energy Projects'* document provides guidance on the preparation of Environment Impact Statements (EIS) and Natura Impact Statements (NIS) for offshore renewable energy projects. It aims to assist developers in preparing relevant statements that may be required for the development of projects. It will also provide competent authorities, consultation bodies and the public with a basis for determining the adequacy of these statements. The EIAR has been prepared in compliance with the guidance.

Guidance on Marine Baseline Ecological Assessments & Monitoring Activities for Offshore Renewable Energy Projects Part 1 and Part 2 (Department of Communications, Climate Action and Environment, 2018)

Part 1 of the Guidance on Marine Baseline Ecological Assessments and Monitoring Activities Offshore Renewable Energy Projects document provides a non-technical summary of the baseline data requirements and monitoring that may be necessary to evaluate potential impacts of offshore renewable energy projects on the marine environment. It will be reviewed and updated as required. The guidance is intended primarily for developers but will also be of benefit to consenting authorities during the consenting process. Part 2 provides greater technical detail and is primarily aimed at the experts designing and undertaking the required monitoring and assessments. The marine surveys, monitoring and assessments undertaken as part of the EIAR have been prepared and carried out in accordance with Part 1 and 2 of the guidance.

2.6 Planning History

This Section sets out various planning related searches that were carried out both within the planning application site boundary (Red Line Boundary) and within the wider area surrounding the subject site.

The search found planning applications, foreshore applications and MACs through various governmental and local authority websites and databases including:

- An Bord Pleanála's (ABP) online planning portal
- Clare County Council's online planning portal
- The Department of Housing, Planning and Local Government's online list of foreshore applications
- MARA's online List of Applications for a MAC

2.6.1 Project Consenting History

This Section outlines the key consents and approvals obtained throughout the project's history. Following the designation of the Project, as a 'Relevant Project' in 2020, the Project received its MAC in 2022, allowing for an application to be made to ABP for development permission under Section 291 of the Planning Act.

2002 Foreshore Licence

A foreshore licence was granted to Fuinneamh Sceirde Teoranta (FST) (the Applicant) for site investigations in 2002 and was subsequently extended in 2007.

2008 Foreshore Lease

In May 2008, FST submitted a Foreshore Lease application to occupy an area of the foreshore at Sceirde Rocks, County Galway for the purpose of constructing an offshore wind farm).[16] This application was not determined.

2020 Relevant Project Status confirmation

On 21 May 2020, Sceirde Rocks Offshore Wind Farm was confirmed as a "Relevant Project" pursuant to the Transitional Protocol, given that it had an application for a foreshore licence that had been submitted but not yet determined.

2022 Foreshore Licences – Offshore Array and Export Cable Corridor

Subsequent to this, Foreshore licences for site investigations, FS007161 and FS007543, were granted in September 2023 for the array and grid connection areas respectively.

The applications specifically relate to foreshore licenses for site investigation activities in the wind farm array area and the along the export cable corridor.

The offshore array application states that "the objective of the proposed Sceirde Rocks Offshore Wind Farm site investigations is to determine geotechnical, geophysical, metocean, wind resource and benthic characteristics within the Foreshore Licence Area.". Similarly, the export cable corridor foreshore licence application states that 'the objective of the proposed Sceirde Rocks export cable corridor site investigations is to determine geotechnical, geophysical and benthic characteristics within the Foreshore Licence Area. The area applied for included for the survey of potential export cable routes into Galway Bay and two routes to the Clare coast.[17][18]

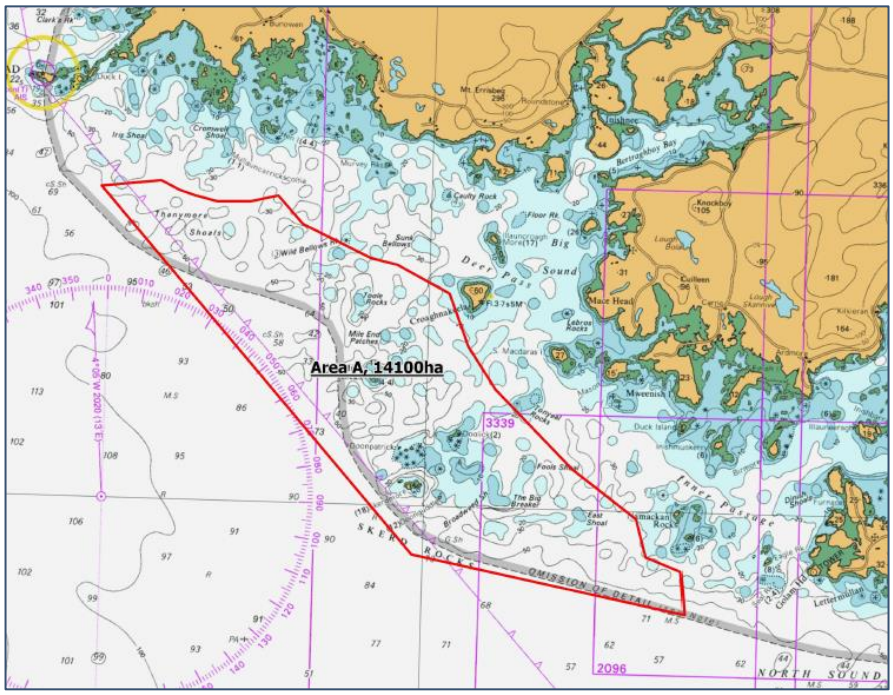

Figure 2-9: Extract of Foreshore Licence Map from FS007161

[16] https://www.gov.ie/en/foreshore-notice/3590d-fuinneamh-sceirde-teoranta/
[17] https://www.gov.ie/en/foreshore-notice/7a077-fuinneamh-sceirde-teoranta-site-investigations-for-the-proposed-sceirde-rocks-offshore-wind-farm/#determination
[18] https://www.gov.ie/en/foreshore-notice/1ae0f-fuinneamh-sceirde-teoranta-site-investigations-for-the-proposed-sceirde-rocks-offshore-wind-farm-export-cable-corridor/#determination

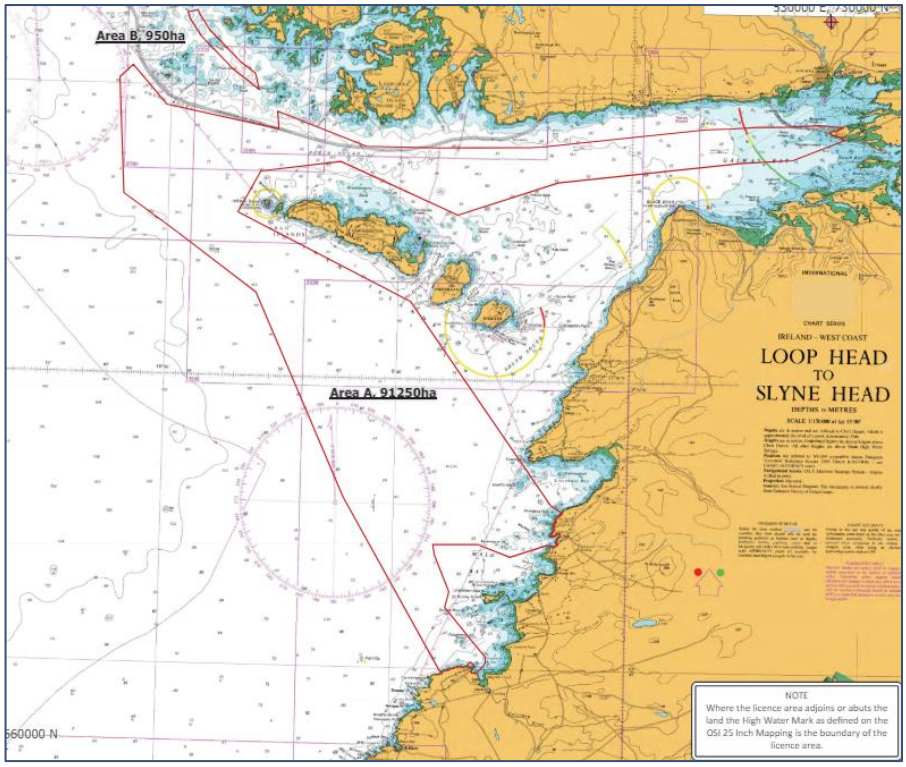

Figure 2-10: Extract of Foreshore Licence Map from FS007543

Maritime Area Consent

FST was granted a MAC (2022-MAC-007) which commenced on the 23rd of December 2022. 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). A MAC consent is required in order to lodge an application under Section 291 of the Planning Acts.

Three amendments to the MAC have been granted since the original grant in December 2022. The first amendment, relating to the extension of the date by which application for development permission must be submitted, was granted by the Maritime Area Regulatory Authority (MARA), on the 21st of May 2024. The second amendment, relating to the extension of the Array Area, was granted by MARA on the 28th of May 2024. The third amendment related to a further extension of the date by which application for development permission must be submitted and was granted by the MARA on 9th December 2024.

2.6.2 Planning Applications within the Red Line Boundary

A search was carried out for applications for development within the planning application site boundary (as delineated by the red line site boundary) in December 2024.

In total, 9 no. of permissions were identified within the application boundary. The applications are outlined in the Table 2-7 below.

Table 2-7: Project Planning History

Planning Reference	Development Description	Decision
Clare CC: 14487	For grant of a ten year planning permission for development at a site in the townlands of Carrowmore South, Einagh and	Refused - 08/10/2014

(ABP Ref: PL03.244088)	Shragh, approximately 2km south of the village of Doonbeg. The development will comprise nine electricity generating wind turbines with a hub height of up to 85 metres and a rotor diameter of up to 82 metres giving an overall height of up to 126 m, hard standings, a control building, an electrical compound, a permanent meteorological mast, associated site roads, drainage and site works. The planning application is accompanied by an Environmental Impact Statement (EIS) and a Natura Impact Statement (NIS)	Appealed & Refused by ABP - 02/07/2015
Clare CC: 17542	to RETAIN advertising signage and associated structure	Refused - 05/09/2017
Clare CC: 011538 (ABP Ref: PL03130164)	Wind Energy Project. - 9 wind turbines, each having a rated electrical output of up to 2,500 kilo watts. Each wind turbine will comprise a tower about 68 metres high, with a diameter of about 4 metres at the base and 3 metres at the top.	Granted - 23/05/2002 Appealed & Granted by ABP - 18/10/2002
Clare CC: 1274 (ABP Ref: PL03.241624)	for a 10 year Planning Permission for a Wind Farm Project at Moneypoint Generating Station. The development will consist of five wind turbines each having a rated electricity output of approximately 3,000 kilowatts, modification of the existing high voltage Electrical Transformer Station to house additional electrical equipment and an additional single-storey Control Building, two anemometer masts and all associated site works, above and below ground. Each wind turbine will have an overall maximum dimension of 152 meters, comprising a tower 95 - 100 meters high, with a diameter of about 4 meters at the base, to which 3 blades of 52 - 55 meters length will be attached. An Environmental Impact Statement will be submitted to the Planning Authority with the Application.	Refused - 22/01/2013 Appealed and Granted by ABP - 12/12/2013
Clare CC: 17809	for development which will consist of two water storage tanks above ground level and an underground pump chamber located within the Moneypoint generating station complex. The proposed development will take place within the existing footprint of the site and consists of an underground pump chamber (V=60m3), that will collect the rainwater from two existing runoff lines and pump it to two water storage tanks 1,000m3 and 2,000m3 to facilitate the retainment of surface water from the site prior to discharge from licensed facility discharge point already on the site. This application relates to a site for which a licence under Part IV of the Environmental Protection Agency Act 1992 (as amended for the Protection of the Environment Act, 2003) has been issued (EPA Reg. Ref. P0605-03)	Granted - 22/01/2018
Clare CC: 2332	for development within the Moneypoint Generating Station, Carrowdotia North and Carrowdotia South, Kilimer, County Clare (Eircode V15 R963) which is licenced by the Environmental Protection Agency (EPA) under an Industrial Emissions (IE) Licence (Ref P0605-04) and Upper tier COMAH site and therefore falls under the requirements of the Control of	Granted - 18/04/2023

	Major Accident Hazard Regulations (COMAH) Regulations, 2015. The development, which will be located at various locations within the station complex, will consist of land based site Investigation (SI) works comprising of boreholes and trial pits across the site	
Clare CC: 161011	with the consent and approval of the Electricity Supply Board, for works associated with the refurbishment of the existing Moneypoint - Oldstreet 400 kV overhead line within the various townlands as set out in the newspaper and site notices.	Granted - 24/09/2017
ABP Ref: 319080 (SID)	Proposed transition and conversion of the existing 900MW electricity generating station from coal to heavy fuel oil and associated ancillary development at Moneypoint Generating Station, Moneypoint, Co. Clare. www.moneypointsecurityofsupply.ie	Granted - 25/09/2024
ABP Ref: 307798 (SID)	Proposed 400kV electricity transmission cables, extension to the existing Kilpaddoge Electrical Substation and associated works, between the existing Moneypoint 400kV Electrical Substation in the townland of Carrowdoita South County Clare and existing Kilpaddoge 220/110kV Electrical Substation in the townland of Kilpaddoge County Kerry. The development includes work in the foreshore.	Granted - 04/06/2021

2.6.3 Maritime Applications and Consents within the Red Line Boundary

A search was carried out for applications for development within the Red Line Boundary in October 2024. 5 no. foreshore applications were identified of which only 1 no. application has been determined (IRIS sub-sea cable).

The Project is the only Relevant Project / Phase 1 offshore renewable development in the region with a MAC, the only offshore wind development in the region which was successful in Offshore Renewable Electricity Support Scheme (ORESS) 1 and the only offshore wind development in the region, which is permitted to make a planning application.

There were a number of planned offshore renewable developments (at various levels of inception) proposed to be developed off the western coast of Ireland before the State's policy changed to a plan-led regime. Current policy is such that none of these projects are permitted to seek a MAC or make a planning application. However, whether any of them may progress in the future is entirely dependent on future policy decisions. Please see Table 2-8 below for details on maritime applications and consents within the Red Line Boundary.

Table 2-8: Maritime applications and consents within the Red Line Boundary

Consent Reference	Development	Description	Status
Foreshore License Application Ref: FS007149	Western Star Wind	Site Investigations for proposed Offshore Wind Farm, off County Clare	Applied
Foreshore License Application Ref: FS007372	Saoirse Wave Energy	Site Investigations for proposed Offshore Wind Farm, off County Clare	Applied

Foreshore License Application Ref: FS006886	Clarus Offshore Wind Farm	Site Investigations off Counties Kerry and Clare	Consultation
Foreshore License Application Ref: FS007366	Munster Sea Wind	Site Investigations for proposed Offshore Wind Farm, off County Clare	Applied
Foreshore License Application Ref: FS007246	IRIS sub-sea fibre optic cable system	Main lay and construction works for installation of the IRIS sub-sea fibre optic cable system, Co Galway	Constructed and operational

2.7 Scoping and Consultation

2.7.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to Environmental Impact Assessment (EIA). This process is conducted by contacting the relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Development and its potential effects on the environment and provides initial feedback in the early stages of the design iteration process. In this way scoping not only informs the content and scope of the EIAR, but it also provides a feedback mechanism for the proposal design itself.

2.7.2 Scoping Responses

Table 2-9 and Table 2-10 detail the responses received from the bodies to the scoping document circulated in September 2023. Copies of all scoping responses are included in Appendix 2-2 of this EIAR. If further responses are received, the comments of the consultees will be considered in the construction and operation of the Project in the event of a grant of development permission. The recommendation of the consultees has informed the project design and scope of assessments undertaken and the contents of the EIAR.

Table 2-9: Scoping List and Date of Response

No.	Consultee	Date of Response
1	Aer Arann Islands	No Response
2	AirNav Ireland	No Response
3	An Taisce - National Trust for Ireland	No Response
4	Bat Conservation Ireland	No Response
5	BIM (Bord Iascaigh Mhara)	No Response
6	BirdWatch Ireland	No Response

7	Butterfly Conservation Ireland	No Response
8	Clare County Council - Environment Department	1/09/2023 & 03/07/2024
9	Clare County Council - Roads Department	19/10/2023
10	Clare County Council - Heritage Department	No Response
11	Coimisiún na Meán	04/09/2023
12	Commissioners of Irish Lights	5/10/2023 & 06/10/2023
13	Commission for Regulation of Utilities (CRU)	No Response
14	Department of Agriculture, Food and the Marine	No Response
15	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No Response
16	Department of Communications, Climate Action and the Environment	1/09/2023
17	Department of Defence	11/10/2023
18	Department of Transport	No Response
19	Department of Housing, Local Government and Heritage	01/05/2024
20	Diving Ireland (Irish Underwater Council)	No Response
21	EirGrid	No Response
22	Environmental Health Service	No Response
23	Environmental Protection Agency (EPA)	26/09/2023
24	ESB	No Response
25	Fáilte Ireland	3/10/2023
26	FORUM Connemara	2/10/2023, 3/11/2023
27	Friends of the Irish Environment	No Response
28	Galway Airport	No Response
29	Galway City Council - Environment Department	04/09/2023
30	Galway City Council - Roads Department	No Response
31	Galway City Council - Heritage Department	No Response
32	Galway City Council – Planning Department	04/09/2023 &19/10/2024

33	Galway County Council - Environment Department	No Response
34	Galway County Council - Roads Department	04/09/2023
35	Galway County Council - Heritage Department	No Response
36	Galway Chamber of Commerce	No Response
37	Gas Networks Ireland	04/09/2023
38	Geological Survey of Ireland (GSI)	09/10/2023
39	Golden Eagle Trust	No Response
40	Health Service Executive (HSE)	04/09/2023 & 14/05/2024
41	Iarnród Éireann	19/10/2023
42	IDA Ireland	No Response
43	Irish Coast Guard	30/11/2023
44	Inland Fisheries Ireland (Galway)	06/06/2024 & 17/09/2024
45	Inland Fisheries Ireland (HQ)	19/10/2023
46	Irish Aviation Authority	26/10/2023
47	Irish Landscape Institute	No Response
48	Irish Peatland Conservation Council	09/01/2023
49	Irish Red Grouse Association	20/10/2023
50	Irish Raptor Study Group	No Response
51	Irish Sailing Association	19/12/2023
52	Irish Seaweed Research Group / Irish Seaweed Consultancy	No Response
53	Irish Whale & Dolphin Group	11/10/2023
54	Irish Wildlife Trust	06/09/2023
55	Marine Institute of Ireland	No Response
56	Marine Survey Office (MSO)	No Response
57	Maritime Safety Policy Division	20/10/2023
58	MaREI - SFI Research Centre for Energy, Climate and Marine Research & Innovation	No Response

59	Met Eireann	07/11/2023
60	National Parks and Wildlife Services (NPWS)	08/09/2023
61	National University of Ireland Galway – Property Management Section (met station)	03/11/2023
62	Northwestern Regional Assembly	No Response
63	Office of Public Works (OPW)	25/10/2023
64	Port of Galway	No Response
65	Rossaveal Harbour Master	19/10/2023
66	Royal National Lifeboat Institution	No Response
67	Sea Fisheries Protection Authority	No Response
68	Shannon International Airport	04/09/2023
69	Sports Ireland (formerly Irish Sports Council)	No Response
70	Sustainable Energy Authority of Ireland (SEAI)	No Response
71	The Arts Council	No Response
72	The Heritage Council	No Response
73	Transport Infrastructure Ireland	27/09/2023 &26/03/2024
74	Údarás na Gaeltachta	No Response
75	Uisce Eireann	19/10/2023
76	Waterways Ireland	14/09/2023
77	West Region Local Authority Waters Programme	19/10/2023

Table 2-10: Consultee responses and relevant chapters

Consultee	Points raised by consultee	Addressed in Chapter
Broadcasting Authority of Ireland (now Coimisiún na Meán)	Advised that they do not perform in-depth analysis of wind turbines on FM networks. However, they noted that project is not located close to any existing or planned FM transmission sites, and are not aware of any issues from existing windfarms into existing FM networks	N/A
Clare County Council - Environment Department	Referred the scoping document to the Planning Section, note that no written response has been received from the Planning Department to date.	N/A
Clare County Council - Environment Department	Noted the reference to Cable routes, so an Outline Traffic Management Plan will be needed, and any road openings/ Trenches will need to be agreed with the Area Engineer in terms of trench location and reinstatement. Also noted haulage routes/autotracking however only relevant if turbines are being transported on roads in Clare. A second response to the scoping exercise was also received from an Environmental Officer within Clare County Council stating that the photomontages which were released as part of the virtual consultation room were extremely useful, in particular the view from Inis Mór, and requested that a photomontage point from the Cliffs of Moher to allow visualisation of the impact (if any) on this tourist site. A Photomontage from the Cliffs of Moher was sent to Clare County Council on the 25/09/2024	Chapter 29: Traffic and Transportation Chapter 6: Population and Human Health Chapter 16: Seascape, Landscape and Visual Impact Assessment Chapter 27: Landscape and Visual Impact Assessment
Clare County Council - Roads Department	Advised that they have reviewed the EIAR Scoping Report and have no comments to add. Noted the reference to cable routes, so an Outline Traffic Management Plan will be needed, and any road openings/trenches will need to be agreed with the Area Engineer in terms of trench location and reinstatement.	Chapter 29: Traffic and Transportation

Consultee	Points raised by consultee	Addressed in Chapter
	Also noted haulage routes/autotracking however only relevant if turbines are being transported on roads in Clare.	
Commissioners of Irish Lights	Responded requesting a meeting to discuss the Scoping report and to provide their comments Subsequently, a meeting was held with Irish Lights, FST, MKO and Xodus on 22/11/2023. Irish Lights noted that: › Irish guidance document is still being worked on, but in the interim, there is an expectation that projects will align with MGN 654, and with the IALA requirements. › Irish Lights will be most concerned with the lighting and marking aspects of the site that will need to be provided in accordance with industry standards › Irish Lights will undertake inspections of the lighting systems on the turbines during the operational phase. A Second meeting was held on the 17/10/2024 with Irish Lights, FST, MKO and Xodus to cover aspects of the project which were further developed since the initial meeting. Irish lights noted; › That an operational buoy may be required to assist nearby routeing vessels maintain a suitable distance from the OAA.	Chapter 14: Shipping and Navigation Chapter 15: Civil and Military Aviation
Department of the Environment, Climate and Communications	Advised that “the Department provides observations in relation to County Development Plans, Local Area Plans and Strategic Environmental Assessments. The Department does not provide observations for individual projects and developments.”.	N/A
Department of Defence	Advised that, on consultation with the relevant Military authorities, they had no observations at this point in time.	N/A

Consultee	Points raised by consultee	Addressed in Chapter
Department of Housing, Local Government and Heritage	The Development Applications Unit replied outlining a number of heritage related observations and recommendations. These recommendations were in relation to the following headings; Archaeology, the Scope of Underwater Cultural Heritage in the EIAR, Cultural Heritage, Architectural heritage, Folklore and history, The Landscape, Wrecks, Submerged prehistoric sites and palaeolandscapes, maritime and coastal built heritage, Maritime and coastal built heritage, Statutory Protections in Underwater Cultural Heritage, Considerations in Archaeological Assessment of OWF Projects, Underwater Cultural Heritage in the EIAR, Mitigation by Avoidance, Mitigation by Remedy/Offsetting, Archaeological Excavation, Archaeological Monitoring, Follow up Inspections, and the use of a Project Archaeologist	Chapter 17: Marine Archaeology and Cultural Heritage Chapter 24: Onshore Cultural Heritage
Environmental Health Service (County Clare)	PEHO Clare forwarded Scoping email to National Office. They advised they will log same and refer to the relevant sections of HSE for observations, including the Galway Environmental Health office.	N/A
Environmental Protection Agency	The EPA advised that a dumping at sea permit is required in the event that any deliberate disposal of a substance or material in the maritime area, as defined in Section 1 of the Dumping at Sea Act 1996 as amended, is proposed.	Chapter 5: Project Description Chapter 7: Marine Physical and Coastal Processes
Fáilte Ireland	Failte Ireland noted the methodology approach along with the comprehensive baseline included within the scope of the EIAR Scoping Document. They advised that, from a tourism perspective it is considered that the following areas are of most relevance and importance: › Population and Human Health (including Socio-Economic, Tourism and Recreation). › Coastal and Marine Infrastructure and Other Users. › Seascape, Landscape and Visual Impacts. › Shipping and Navigation; and › Marine Archaeology and Cultural Heritage	Chapter 6: Population and Human Health Chapter 14: Shipping and Navigation Chapter 16: Seascape, Landscape and Visual Impact Assessment Chapter 17: Marine Archaeology and Cultural Heritage

Consultee	Points raised by consultee	Addressed in Chapter
	Fáilte Ireland's response also noted that that beautiful scenery and natural attractions score highly as reasons for tourists visiting Ireland. These factors are environmental and relate particularly to the landscape, coastal and rural areas. They also made reference to specific tourist attractions and general tourism guidelines, including the below; › Connemara Coast and Islands › Wild Atlantic Way & EuroVelo 1 – Atlantic Coast Route › Wild Atlantic Way Coastal Path › Landscape & Visual The scoping response concluded that the inclusion of the assessment of tourism within the Population and Human Health chapter is noted, along with the tourism considerations referenced in the Seascape, Landscape and Visual Impact Assessment. However, given the sensitivities as outlined above in their submission it was requested that a standalone tourism impact assessment be undertaken to ensure the protection of "the wildness of the landscape" thereby aligning with the Overall Wild Atlantic Way Strategy. A meeting was held with Fáilte Ireland on the 16/10/2024	Chapter 24 Archaeology and Cultural Heritage Chapter 27: Landscape and Visual Impact Assessment
FORUM Connemara	FORUM Connemara, replied to Scoping Document requesting callback. When called, the representative expressed great support for the Project and is of the opinion that it will be extremely beneficial to the Connemara region. They stated they will respond to the Scoping Document via email to express the full support of FORUM Connemara. Upon submission of the application to ABP, they will make a formal submission on behalf of FORUM Connemara to further demonstrate their support for the Project.	Chapter 6: Population and human Health
Gaway City Council - Environment Department	Galway City Council advised that our scoping email had been forwarded to the Environmental department for their direct review, but no further response was received	N/A

Consultee	Points raised by consultee	Addressed in Chapter
Galway City Council Planning Department	Galway City Planning advised that the scoping letter and document was forwarded onto a senior planner, but no further response was received	N/A
Galway City Council – Roads Department	Galway City Council advised that our scoping email had been forwarded to the Local Area Office in Carraroe, but no further response was received.	N/A
Gas Networks Ireland (GNI)	GNI provided commentary in relation to the indicative onshore area in Galway. They advised that have no pipeline assets in the onshore area in County Clare or any of the offshore area highlighted in the EIAR Scoping Document.	N/A
Geological Survey Ireland (GSI)	The GSI responded stating that they encourage the use of and reference to their datasets and provided a list of publicly available datasets that may be useful to the environmental assessment and planning process. GSI recommend that any datasets that are considered relevant to the Project are reviewed and referred to.	Chapter 22: Land, Soils and Geology
Health Service Executive (HSE)	The Scoping Report was referred to the National Environmental Health Services Network Support Unit of the HSE, who also referred it to Public Health, HSE Estates, Health Protection and the appropriate Community Health Organisations within the HSE (who did not provide comment). The National Environmental Health Services Unit advised that they would not be making any comments on the marine aspects of the Project. They did request further details of the OGC when further details were available. Further details were issued in April 2024. They also recommended that a dedicated website be set up to include all of the planning documentation.	Chapter 6: Population and Human Health
Inland Fisheries Ireland (Galway)	Over the course of further communications with IFI, the Scoping Report was issued again and some further details provided. No formal response to the Scoping Report has been received to date.	N/A

Consultee	Points raised by consultee	Addressed in Chapter
Inland Fisheries Ireland (HQ)	Responded stating that the Scoping Report was not received due to the size limit of their inbox, but when queried on preferred method to receive the document, no further response was received.	N/A
Iarnród Éireann/ Irish Rail	Iarnród Éireann/ Irish Rail noted that the offshore indicative scoping areas and the onshore area in West Clare are all remote from the railway so advised that they have no comments to make on these. They noted that the onshore indicative scoping area near Galway is bisected by the Athenry to Galway Railway line so requested to be consulted about any proposed construction works within 100m of the railway.	N/A
Irish Coast Guard (IRCG)	The IRCG noted that the EIAR scoping report does not take into account the contents of the National Maritime Oil/HNS Spill Contingency Plan and the National SAR plan, providing links to these plans. They suggested that the EIAR report is updated to include and take account of the contents of these plans.	Chapter 5: Project Description Chapter 8: Water and Sediment Quality Chapter 14: Shipping and Navigation
Irish Aviation Authority (IAA)	The IAA recommended that consultation is undertaken with AirNav, Galway Aviation Services Limited, Dept of Defence, Irish Coast Guard. Advised that it is likely that the following general observations would be proffered by the Authority during a formal planning process: "In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: 1. *agree an aeronautical obstacle warning light scheme for the offshore wind farm development,* 2. *provide as-constructed coordinates in WGS84 format together with blade tip height elevations at each wind turbine location and*	Chapter 15: Civil and Military Aviation

Consultee	Points raised by consultee	Addressed in Chapter
	3. *notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection."*	
Irish Peatland Conservation Council (IPCC)	IPCC responded to the Scoping document with a detailed response which included recommendations for protecting peatland habitats. The IPCC provided a number of concerns they have pertaining to the proposed development which need to be given due consideration within the pre-planning stage before they could support the project under the following headings, listed below; › Legal Obligations to Protect Peatlands › National Monuments › Bogland › Nitrogen › Biosecurity › Water Framework Directive › Curlew › Wetland Surveys Ireland › Fen › Peat Depth › Designated Sites	Chapter 22: Land, Soils and Geology Chapter 23: Water
Irish Red Grouse Conservation Trust (IRGCT)	IRGCT suggested that funds should be put in place to achieve a net biodiversity gain during and after the development of sites such as the Project.	Chapter 20: Biodiversity – Flora and Fauna
Irish Sailing Association	The Irish Sailing Association requested a call back. Following discussions where further details were provided on the extent of the project, the ISA indicated that there did not appear to be any significant issues and that there were no sailing race zones in the OAA.	Chapter 14: Shipping and Navigation Chapter 18: Other Sea Users
Irish Whale and Dolphin Group (IWDG)	The IWDG made the following observations regarding specific sections of the scoping document, with the relevant sections included below;	Chapter 12: Marine Mammals and Other Megafauna

Consultee	Points raised by consultee	Addressed in Chapter
	› Table 8-9 Policy and Guidance Relevant to Marine Mammals and Reptiles: › Table 8-13 Potential impacts on marine mammals and reptiles during construction decommissioning, operations and maintenance of the Project – requested that operational noise be scoped into the assessment › Section 7 Offshore physical environment and Section 8 Offshore biological environment – recommended that the Project collects some background underwater noise data prior to commencement of construction. Also advised that Monitoring of all parameters across the marine ecosystem should begin before project construction with bird, marine mammal, fish and benthic surveys. Any impacts on marine species and on the whole ecosystem need to be continually assessed at a meaningful scale to understand the impacts and to inform future development	
Irish Wildlife Trust	Advised that the Irish Wildlife Trust do not have the staff capacity to respond to this consultation but will endeavour to respond if possible. No further response was received.	N/A
Marine Survey Office (MSO)	No response was received from the MSO following the Scoping exercise. A meeting was held between FST, Anatec and the MSO regarding an overview of Navigational Risk Assessment (NRA) process for the Project. The meeting included an overview of the planned NRA process and high-level review of the baseline conditions.	Chapter 14: Shipping and Navigation
Maritime Safety Policy Division	Advised that the Division does not have any comments or queries in relation to the proposed Sceirde Rocks Offshore Wind Farm.	N/A
Met Éireann	Phone call received 11/07/2023 and followed up with a written scoping response. The response noted that turbines located within the OAA could affect the measurement of wind speed at the weather station at Mace Head near Carna, Co. Galway due to proximity and advised that a distance of 30 times the turbine tip height would be required to avoid such effects and requested that this be taken into consideration in the following stages of development.	Chapter 19: Offshore Air Quality and Airborne Noise

Consultee	Points raised by consultee	Addressed in Chapter
National University of Ireland Galway – Property Management Section (met station)	Denis O'Connor (University of Galway) advised that they are engaging with the Applicant directly. Concerns were raised on the effects of new sources of pollution and perturbations to natural system within the Mace Head measurement footprint area which will render it not fit for purpose as a baseline station as there is no tolerance in gradation acceptable. Raised concerns of the impact on the turbulence structure, the wind speed profiles, whitecapping and through to cloud reflectance, cloud-microphysics, and precipitation formation – all contributing to natural impacts, alongside the additional anthropogenic species that will be added directly to the system.	Chapter 19: Offshore Air Quality and Airborne Noise
Office of Public Works (OPW)	The OPW regional drainage maintenance office noted the following: › the requirement to obtain consent in relation to Section 50 of the Arterial Drainage Act of 1945 as amended for relevant works at watercourse crossings › noted the minimum capacity design requirements for bridges and culverts and › requested consideration of restriction of openings in bridges and culverts	Chapter 22: Land, Soils and Geology Chapter 23: Water
Rossaveal Harbour Master	Harbour Master responded and indicated that the Scoping Report appeared to cover all relevant areas.	N/A
Shannon International Airport	Confirmed receipt of the Scoping Document and stated that they have forwarded it to counterparts in AirNAV Ireland for information and comment purposes. No further correspondence has been received to date.	N/A
Transport Infrastructure Ireland (TII)	TII provided a comprehensive scoping response, noting the detailed information to be considered in relation to the OGC in public roads.:	Chapter 29: Traffic and Transportation

Consultee	Points raised by consultee	Addressed in Chapter
	› Advised that grid connection and cable routing proposals should be developed to safeguard proposed road schemes (minor, major or for maintenance) and that consideration should be given to routing options, use of existing crossings, depth of cable laying, etc. TII noted that the proposed grid connection includes a proposed routing along the national roads and advised that grid connection cable routing should seek to utilise available alternatives. › It was recommended that that haul routes proposed should be identified and fully assessed. In particular where abnormal loads are proposed. › Advised that the developer, in preparing EIAR, should have regard to TII Publications. › Recommended that a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads.	
Uisce Éireann	Advised that they do not have capacity to provide comments on specific projects but provided a list of general aspects of Water Services that should be considered within the EIAR, where relevant.	N/A
Waterways Ireland	Noted that the Project is not within any Zone of Influence of Waterways Ireland, so they will not be commenting.	N/A
West Region Local Authority Waters Programme (LAWPRO)	LAWPRO advised that they are not a statutory authority and don't make comments on development projects. However, it was recommended that the EIAR provides appropriate consideration of the draft River Basin Management Plan for Ireland 2022 – 2027, which is due to be finalised in Q4 of 2023.	Chapter 22: Land, Soils and Geology Chapter 23: Water

2.8 Other Consultations

2.8.1 Community Engagement

The Applicant has undertaken extensive consultation with the local community. Community engagement began in January 2022, with the appointed of a Fisheries Liaison Officer (FLO) and early consultation with local community groups. In August 2022, a Community Liaison Officer (CLO), Michael Cloherty, was appointed to the Project on a full-time basis to manage the consultation process. The CLO has been based full time in the project information office in the Gteic building in Carna. The office has been used to meet with individuals and local community groups. All materials, images, maps and VR equipment used during the projects public consultation has been available to view and use on an ongoing basis from the office. A dedicated project website was launched in April 2023 and continues to be updated on a regular basis with the latest information on the Project. A virtual consultation room, which went live on the website in April 2024, provided Project details and a photomontage viewer. A dedicated email address and phone number to facilitate enquiries were made available on all project information documents and on the Project website.

From January 2022, the Project team has been working to ensure that community engagement and public consultation activities have been carried out according to the fundamental principle of proactive consultation and open discussion. Summary details of consultations and interactions with the community since January 2022 is provided in the Community and Stakeholder Engagement Report, which can be found as Appendix 2-3 of the EIAR.

A central component of the public consultation strategy was a 4-day public consultation event held from 11th to the 14th June 2024. The events were held in the conference room of the Gteic hub, located in the Enterprise Centre in Carna, Co. Galway. The events were advertised locally and nationally 2-3 weeks prior through the project website, local paper notices, media press release, announcements and radio news features and interviews. Over the 4 events approx. 150 people attended in person. A wide range of detailed information, maps, images and reports around the Project were on visual display, as well as members of the project team available to answer questions, queries and provide and share information. Also, available at the event was a virtual reality headset showing a selection of viewing points of the project from land as a real-life experience in a 360' format.

The objective of the consultations was to ensure that the views and concerns of all were considered as part of the Project design and Environmental Impact Assessment (EIA) process. Appendix 2-3 of this EIAR contains a full and detailed community engagement report. The report was prepared to record the consultation carried out with the local community and stakeholders in respect of the Project. The Project has the potential to have significant benefits for the local economy, by means of job creation, and economic opportunities for local contractors, suppliers and service providers. An important part of the Project is its Community Benefit Package. The concept of directing benefits from wind farms to the local community is promoted by the National Economic and Social Council (NESC) and Wind Energy Ireland (WEI) among others.

The Project will provide an enduring economic benefit to the communities surrounding the Project as outlined in Appendix 2-3 of the EIAR, through the community benefit package for residents and community groups and employment during the construction and operation of the Project. The community benefit fund, which will form part of the community benefit package, will be set-up, administered and governed in compliance with the ORESS 1 Community Benefit Funds Rulebook for Generators and Fund Administrators, published in January 2023. If permitted and constructed, it is estimated that the Project will contribute over €3.5 million per year to the community benefit fund.

2.8.2 Pre-Application Consultation

2.8.2.1 An Bord Pleanála

The pre-application consultation process was commenced with ABP in June 2023 (Pre-planning ref: 317409 & 317410). Case ref 317409 relates to the pre-application consultation that took place under Section 287 of the Planning Act, and this is summarised below. Case reference 317410 relates to the pre-application consultation that was originally requested under Section 287A of the Planning Act relating to design flexibility. Design flexibility under this Section of the Act was not pursued and a meeting did not take place with ABP under Section 287A(3). The request for a meeting under Section 287A was withdrawn by the Applicant.

First Meeting

Members of the team and the prospective Applicant met with representatives from ABP on the 19th of September 2023. The meeting was held in-person at ABP offices and online via MS Teams. Those in attendance were:

- Stephen Kay (ABP)
- Una O'Neill (ABP)
- Meave Flynn (ABP)
- Eugene Nixon (ABP)
- Cora Cunningham (ABP)
- Evan McGuigan (ABP)
- Kieran O'Malley (FST)
- Tim Coffey (FST)
- Colm Ryan (MKO)
- Órla Murphy (MKO)
- Ronan Dunne (MKO – Online)
- Michael Watson (MKO – Online)
- Sean Creedon (MKO – Online)
- Robert Kennedy (MKO – Online)
- John Willougby (MKO – Online)
- Ewan Edwards (Xodus – Online)
- Richard Barker, (Macroworks – Online)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- Introduction to the Project and the Project Team
- Project Background and Description
- Policy & Legislative Context
- Site Location & Selection
- Project Overview
- Proposed Grid Connection Route
- Site Consents & Licences
- Site Surveys & Investigations
- Constraint Assessment, Design Process & Key Project Elements
- Environmental Impact Assessment
- Consultation
- Project Timeline
- Feedback & Discussion

Following this presentation, there was further discussion held between the project team and the representatives of ABP. Matters discussed included:

- The elements of the Project to be included in the planning application
- The visual impact assessment, photomontage viewpoint locations and appropriate study area
- The consideration of impacts on designated sites and survey methodologies
- The consideration of policies set out in the NMPF

- Project works at the Landfall
- Consultation and engagement with relevant bodies
- Foundation design and construction methodology
- Community consultation undertaken to date
- The provision of application documents in Irish and English
- Further meetings to take place

Second Meeting

Members of the team and the prospective Applicant met with representatives from ABP on the 18th of December 2023. The meeting was held in-person at ABP offices and online via MS Teams. Those in attendance were:

- Stephen Kay (ABP)
- Una O'Neill (ABP)
- Maeve Flynn (ABP)
- Conor Donnelly (ABP)
- Eugene Nixon (ABP)
- Marcella Doyle (ABP)
- Nichola Meehan (ABP)
- Evan McGuigan (ABP)
- Colm Ryan (MKO)
- Órla Murphy (MKO)
- Ronan Dunne (MKO)
- Kieran O'Malley (FST)
- Richard Barker (Macroworks)
- Tim Coffey (FST – Online)
- Claire Atkins (FST – Online)
- Ewan Edwards (Xodus – Online)
- John Willoughby (MKO - Online)
- Michael Watson (MKO – Online)
- Sean Creedon (MKO – Online)
- Robert Kennedy (MKO – Online)

The team gave an update on the Project in a Power Point Presentation. Matters presented included:

- Planning policy and legislative update
- Project design update and MAC array area amendment application
- Site investigations and survey update
- EIAR and consultation update
- Landscape and visual impact assessment progress and photomontages
- Update on feedback and engagement with Galway and Clare County Councils
- Recent consultations and events held with the local community
- Project timelines

Following this presentation, there was further discussion held between the project team and the representatives of ABP. Matters discussed included:

- The updated layout and extension of the MAC amendment
- The application of the design flexibility legislation
- The policies of the NMPF and the compliance of the Project
- Engagement to date with the stakeholders
- The provision of application documents in Irish and English.
- The Community Benefit Fund
- Survey effort along the grid connection corridor
- Potential impact on other projects in the area
- Further meetings to take place

Third Meeting

Members of the team and the prospective Applicant met with representatives from ABP on the 26th of July 2024. The meeting was held online via MS Teams. Those in attendance were:

- Stephen Kay (ABP)
- Una O'Neill (ABP)
- Conor Donnelly (ABP)
- Eugene Nixon (ABP)
- Marcella Doyle (ABP)
- Raymond Muwaniri (ABP)
- Colm Ryan (MKO)
- Órla Murphy (MKO)
- John Willoughby (MKO)
- Robert Kennedy (MKO)
- Ronan Dunne (MKO)
- Kieran O'Malley (FST)
- Tim Coffey (FST)
- Claire Atkins (FST)

The team gave an update on the Project in a Power Point Presentation. Matters presented included:

- The planning strategy approach
- Confirmation of the amendments to MAC Array Area
- The final project design
- EIAR update and progress
- Public consultation undertaken
- Engagement with the relevant local authorities

Following this presentation, there was further discussion held between the project team and the representatives of ABP. Matters discussed included:

- Procedural matters to be followed for the making of an application
- Sea-bed preparation and relevant licences for dumping at sea
- Construction methodologies for the gravity-based foundations, cables and landfall
- Coastal transport and sediment dynamics
- Impact of the Project on Designated Sites
- Ports to be used during construction and operation
- Engagement with stakeholders
- The provision of certain application documents in Irish

Pre-Application Close-out

The pre-application consultation was closed by ABP in accordance with Section 287(3) of the Planning Act in a letter dated the 24th September 2024.

2.8.2.2 Galway County Council

First Meeting

Members of the team and the prospective Applicant met with representatives from Galway County Council (GCC) on the 3rd May 2023. The meeting was held in-person at Galway County Council's offices. Those in attendance were:

- Alan O'Connell (GCC)
- Tina Ryan (GCC)
- Michael Owens (GCC)
- Valerie Loughnane (GCC)
- David O'Loughlin (GCC)
- Eimear O'Doherty (GCC)
- Colm Ryan (MKO)

- Órla Murphy (MKO)
- Kieran O'Malley (FST)
- Tim Coffey (FST)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- The prospective applicant
- Project background
- Site location and context
- Site constraints
- The Project layout and grid connection route
- Surveys undertaken to date
- The planning application process
- Public consultation undertaken to date
- Project timeline

Following this presentation, there was further discussion held between the project team and the representatives of GCC. Matters discussed included:

- The proposed grid connection to the Moneypoint 220kV Substation
- The extent of the community benefit fund
- Application timelines
- Visual impacts along the coast
- The consideration of designated sites

Second Meeting

Members of the team and the prospective Applicant met with representatives from Galway County Council (GCC) on the 21st November 2023. The meeting was held in-person at Galway County Council's offices. Those in attendance were:

- Alan O'Connell (GCC)
- Liam Hanrahan (GCC)
- Pat O'Sullivan (GCC)
- Eimear Doherty (GCC)
- Lawrence Nea (GCC)
- Colm Ryan (MKO)
- Órla Murphy (MKO)
- Richard Barker (Macroworks)
- Kieran O'Malley (FST)
- Tim Coffey (FST)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- The EIAR structure and development being assessed
- Grid Connection
- Visual impacts on the landscape
- Visual impacts on residential amenity
- Community Benefit Fund
- Site selection and alternative assessment
- Heritage sites within the area
- Decommissioning
- Construction methodologies

Third Meeting

Members of the team and the prospective Applicant met with representatives from Galway County Council (GCC) on the 16th April 2024. The meeting was held online via MS Teams. Those in attendance were:

- Liam Hanrahan (GCC)
- Valerie Loughnan (GCC)
- Fintan Donnelly (GCC)
- Eimear Doherty (GCC)
- Lawrence Nea (GCC)
- Colm Ryan (MKO)
- Órla Murphy (MKO)
- Ronan Dunne (MKO)
- John Willoughby (MKO)
- Robert Kennedy (MKO)
- Keelin Bourke (MKO)
- Adrian Moran (MKO)
- Kieran O'Malley (FST)
- Nick Norris (FST)
- Michael Cloherty (FST)
- Richard Barker (Macroworks)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- General project update
- Design update
- Landscape and visual update including updated photomontage viewpoints
- Community engagement update and community benefit fund details
- EIAR and initial survey results
- Project timelines and application lodgement

Fourth Meeting

Members of the team and the prospective Applicant met with representatives from Galway County Council (GCC) on the 23rd October 2024. The meeting was held in-person at Galway County Council's offices. Those in attendance were:

- Liam Hanrahan (GCC)
- Eimear Doherty (GCC)
- Valerie Loughnan (GCC)
- Anne Power (GCC)
- Deirdre Egan (GCC)
- Tom Prendergast (GCC)
- Tina Ryan (GCC)
- Fintan Donnelly (GCC)
- Ivana Arsic (GCC)
- Eileen Keaveney (GCC)
- Colm Ryan (MKO)
- Ronan Dunne (MKO)
- John Willoughby (MKO)
- Kieran O'Malley (FST)
- Michael Cloherty (FST)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- General project progress update
- Final Project Design
- Findings of the Socio-economic and Tourism assessments undertaken
- Visual impact from the Co. Galway coast, including the presentation of the photomontage booklet and other visual aids
- Community engagement update
- Application lodgement timelines and procedural matters

2.8.2.3 Clare County Council

First Meeting

Members of the team and the prospective Applicant met with representatives from Clare County Council (CCC) on 29th March 2023. The meeting was held in-person at Clare County Council's offices. Those in attendance were:

- Colm Ryan (MKO)
- Michael Watson (MKO)
- Kieran O'Malley (FST)
- Gareth Ruane (CCC)
- Sheila Downes (CCC - Environment)
- John O'Sullivan (CCC)
- Alan Kennelly (CCC - Roads)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- The prospective Applicant
- Project background
- Project location and context
- Onshore Site and Offshore Site Constraints
- The Project layout and grid connection route
- Surveys undertaken to date
- The planning application process
- Public consultation undertaken to date
- Project timeline

Following this presentation, there was further discussion held between the project team and the representatives of CCC. Matters discussed included:

- The planning process
- Nature of construction works along the grid connection
- Considerations for alternatives for the grid connection route
- Likely structure and scale of the community fund

Second Meeting

Members of the team and the prospective Applicant met with representatives from Clare County Council (CCC) on the 20th November 2023. The meeting was held online via MS Teams. Those in attendance were:

- Gareth Ruane (CCC)
- Sheila Downes (CCC - Environment)
- John O'Sullivan (CC)
- Órla Murphy (MKO)
- Ronan Dunne (MKO)
- John Willoughby (MKO)
- Robert Kennedy (MKO)
- Kieran O'Malley (FST)
- Claire Atkins (FST)
- Richard Barker (Macroworks)

The team gave an overview of the Project in a Power Point Presentation. Matters presented included:

- The Prospective Applicant
- Project Background
- Project location and context
- Onshore Site and Offshore Site Constraints
- The Project layout
- The Grid Connection Route and connection into the Moneypoint 220kV Substation
- Surveys undertaken to date
- The planning application process
- Public consultation undertaken to date
- Project timeline

Following this presentation, there was further discussion held between the project team and the representatives of CCC. Matters discussed included:

- The impact on the road network and surveys being undertaken to inform design
- The Landfall and its selection/ suitability
- The visual impact from the Clare coastline, including sites such as the Cliffs of Moher
- Other offshore projects off the coast of Clare and the potential for cumulative impacts
- Connection to the national grid at Moneypoint 220kV Substation
- Potential impacts on archaeology
- The grid connection cable and its impact on road maintenance
- The development of a west coast DMAP

Engagement with Clare County Council's Roads Department

Following the two pre-planning meetings, the Applicant engaged further with the Clare County Council's Roads Engineers. The Applicant first met with Alan Kennelly, Senior Executive Engineer for West Clare, in February 2024. The meeting took place at the Council offices in Kilrush to discuss the route and design of the grid connection. The advice received during the meeting was considered and the design was adjusted accordingly wherever feasible.

A further meeting was held with Clare County Council and TII in Clare County Council's offices on the 30th of May 2024. Those in attendance included, *inter alia*,:

- Alan Kennelly (CCC)
- Members of TII
- Kieran O'Malley (FST)
- Clare Atkins (FST)
- Nick Norris (FST)
- Cormac Murphy (MWP)
- Colm Ryan (MKO)
- Órla Murphy (MKO – Online)