

The logo for Ocean Winds, featuring the letters 'OW' in a large, dark blue, sans-serif font. The 'O' is a solid circle, and the 'W' is composed of two 'V' shapes joined at the top.

OCEAN WINDS

A background image showing several wind turbines on a sandy beach at sunset. The sky is filled with orange and yellow clouds, and the water is visible in the foreground.

Ocean Winds Submission
to the Draft Waterford City
& County Development
Plan 2022-2028

Prepared by

OCEAN WINDS, Development Consenting Unit

Ocean Winds Ireland

Osprey Business Centre,

Devoy Quarter, Naas,

Co. Kildare,

W91 X40K

Date: 30th August 2021

Project: Ocean Winds Submission to the Draft Waterford City & County Development Plan 2022-2028

Sub-Project or Package: N/A

Document Title or Description: N/A

Document Number: N/A

Supplier Reference No: N/A

Contents

1.0	INTRODUCTION	4
2.0	WHO WE ARE – OCEAN WINDS?	6
3.0	OVERVIEW OF CELTIC HORIZON OFFSHORE WINDFARM	7
4.0	THE MARITIME AREA PLANNING BILL (MAP) AND NATIONAL MARINE PLANNING FRAMEWORK (NMPF) VS THE DRAFT WATERFORD CITY & COUNTY DEVELOPMENT PLAN 2022-2028	9
5.0	UTILITY, ENERGY & COMMUNICATION POLICIES AND OBJECTIVES OF THE DRAFT WATERFORD CITY & COUNTY DEVELOPMENT PLAN 2022-2028	10
6.0	CONCLUSION	13

1.0 INTRODUCTION

- 1.1 Ocean Winds welcomes this opportunity to make a submission to the Draft Waterford City & County Development Plan 2022-2028 and supports the central role that County Development Plan will play in implementing the Irish Government's Programme for Government (2020), Climate Action Plan (2019), draft National Marine Planning Framework (2020) and Offshore Renewable Energy Development Plan (OREDP, 2014).
- 1.2 This submission relates to the development of the proposed Celtic Horizon Offshore Wind Farm. The site proposed for the Celtic Horizon Offshore Wind Farm is located in the east Celtic Sea off the coasts of Counties Wexford and Waterford. The site lies within the Celtic Sea area identified in red under Figure 1.1 below.

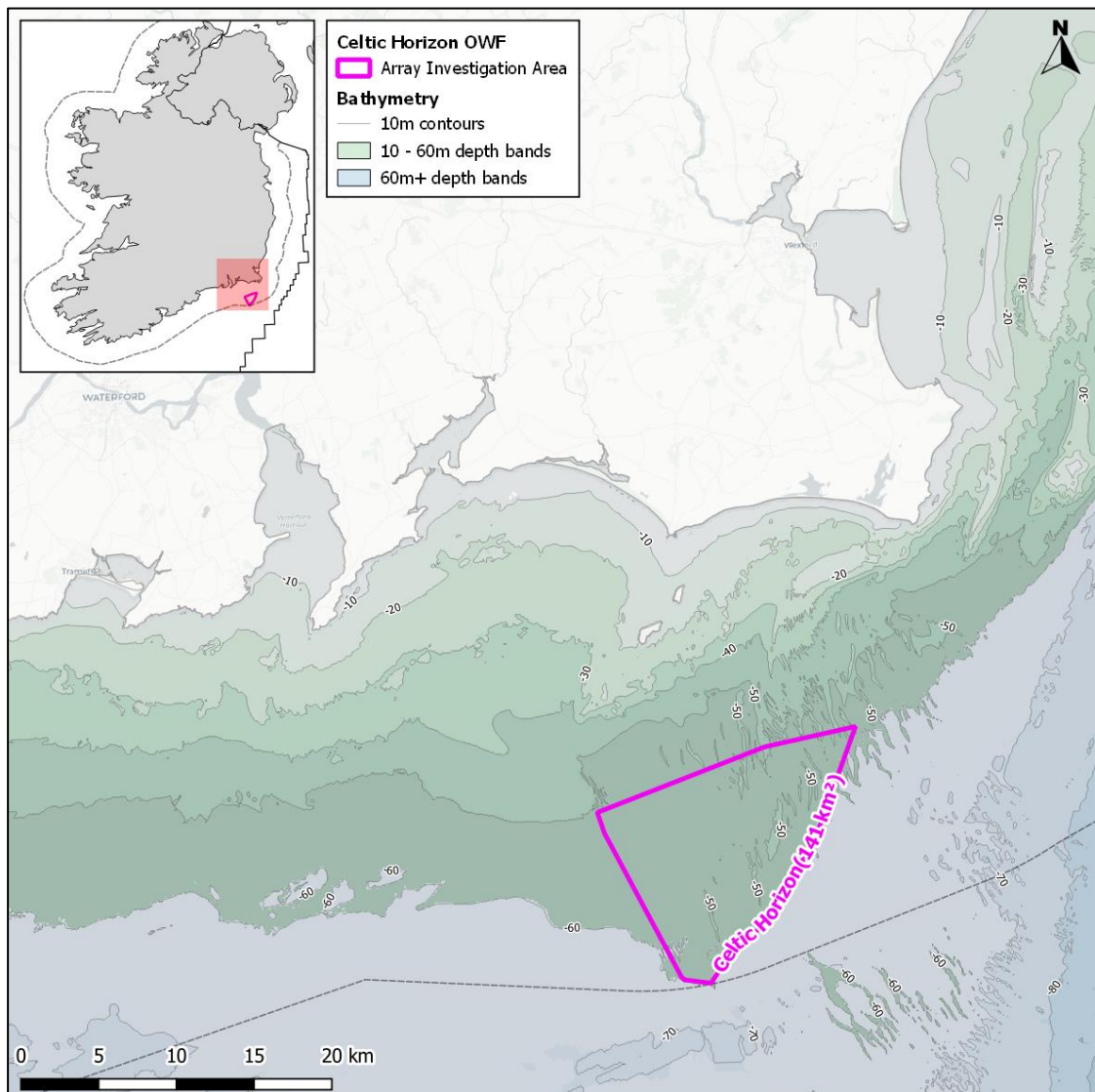


Figure 1.1 - Location of the Celtic Horizon Offshore Wind Farm of the south coast of Co. Waterford and Co. Wexford (Area outlined in pink)

1.3 Ocean Winds have recently submitted a Foreshore Licence Application for the Celtic Horizon Offshore Wind Farm with the Department of Housing, Local Government and Heritage. Ocean Winds notes that application identified three plausible landfall locations. The locations shortlisted included the following;

- Eastern Cable Route (located from Rostonstown to Ballygrangans located in Co. Wexford):
- Central Cable Route (located from Cullenstown to Ramstown located in Co. Wexford):
- Western Cable Route (located from Coxstown East to Brownstown located in Co. Waterford):

Figure 1.2 below shows the location of the landfall options for the Celtic Horizon Offshore Wind Farm export cables and the resultant Proposed Cable Route Area. Please note that the image below only presents potential and indicative routes and is only for illustrative purposes only.

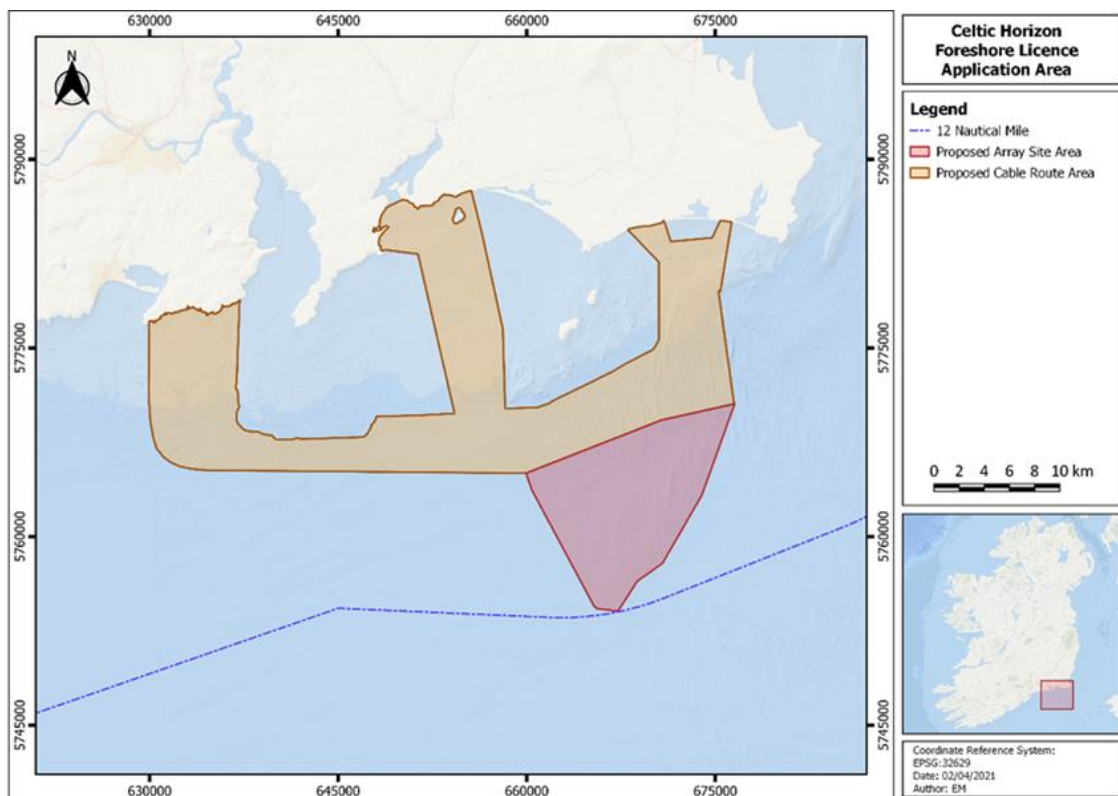


Figure 1.2 – Indicative Route and Investigation Map for the Celtic Horizon Offshore Wind Farm. (Please note that the image below only presents potential and indicative routes and do not form part of any application and are only for illustrative purposes only)

1.4 Ocean Winds supports the vision and objectives included the Draft Waterford City & County Development Plan 2022-2028. Ocean Winds recognise that Waterford City & County Council has a strong reputation in placing climate action at the heart of all policies and strategies. However, given that there are three plausible landfall locations

for the Celtic Horizon Offshore Wind Farm and the plausible Western Cable route is located from Coxstown East to Brownstown located in Co. Waterford, Ocean Winds wish to have a proactive and engaging relationship with Waterford City & County Council regarding the Celtic Horizon Offshore Wind Farm.

- 1.5 It is viewed that the grid connection from the Celtic Horizon Offshore Wind Farm will require an underground transmission cable on land to connect to the main national grid. It is viewed that Waterford City & County Council will be heavily involved in the overland process and will be a key player in the selection of this route. Ocean Winds remains open and committed to engaging with Waterford City & County Council in moving forward with this process in the immediate future.
- 1.6 In light of the comments and considerations presented above, Ocean Winds would like to draw attention to the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF). The Marine Planning and Development Management Bill (2021) seeks to establish a new consent process for the maritime area which will replace existing State and development consent regimes and streamline arrangements on the basis of a single consent principle i.e. one state consent (Maritime Area Consent) to enable occupation of the Maritime Area. It is viewed that Waterford City & County Council will have a central role in supporting and enacting the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF).

2.0 WHO WE ARE – OCEAN WINDS?

- 2.1 Ocean Winds is the result of a 2019 joint venture by EDP Renewables (EDPR) and ENGIE. Both companies share the vision in which renewables, particularly offshore wind, play a key role in the global energy transition. That is why they created a 50-50 joint venture for offshore wind. All the existing and pipeline offshore wind projects portfolio of both companies have been included in the new Ocean Winds company, with a total of 1.5 GW under construction and 4.0 GW currently under development. Ocean Winds aim to reach 5 to 7 GW of projects in operation or under construction and have 5 to 10 GW under advanced development by 2025. The Ocean Winds business mainly targets markets in Europe, the United States and also in selected locations in Asia.

[Joint Venture Company Information: About EDPR](#)

- 2.2 EDPR has a portfolio of 11.6 GW of installed renewable energy capacity spread across 13 geographies. Its wind operations are headquartered in Edinburgh, Scotland, which was established in 2010. EDPR has been developing the Moray East Offshore Wind Farm in the Moray Firth, Scotland, which is currently in construction and has a capacity of 950 MW, with completion aimed at 2022. The Moray West Wind Farm Project, adjacent to Moray East has an expected future output of 800MW, was awarded the required consents and is at the stage of refining engineering and evaluating a route to market in advance of commencing construction. Other EDPR international projects involved development of offshore wind projects in France, Poland, the USA and Korea. EDPR also had a pioneering role in the development of floating offshore wind, through

a project off the coast of Portugal, WindFloat Atlantic, which represented the first floating offshore wind turbine in the Atlantic Ocean and has continued to support the development of floating offshore wind e.g. by developing further pilot projects in France and Portugal and securing floating offshore wind projects in the USA and Korea.

[Joint Venture Company Information: About ENGIE](#)

- 2.3 ENGIE is a global energy company operating in almost 70 countries and having launched several wind projects around the world, it will achieve 33 GW of installed capacity in renewables by 2021. ENGIE is currently investing in major offshore wind projects, both bottom-fixed and floating with the aim of leading in renewable technologies, such as offshore wind energy. The company is both an energy trader and a licensed supplier selling to business customers in the United Kingdom. Its power purchase included Scottish windfarms, including the largest community owned renewables project - Point & Sandwick Trust. ENGIE projects in France include developments offshore of Le Tréport, Yeu and Noirmoutier islands and Dunkirk. It is also part of a consortium selected by the French government to develop and install two offshore wind farms with a total capacity of approximately 1,000 MW.

3.0 OVERVIEW OF CELTIC HORIZON OFFSHORE WINDFARM

- 3.1 Ocean Winds UK Limited (Ocean Winds) has established a special purpose vehicle "Celtic Horizon Offshore Windfarm Limited" for the purpose of investigating the feasibility of developing an offshore bottom-fixed wind farm off the south coast of Ireland. Celtic Horizon Offshore Windfarm Limited is applying for a license to undertake site investigation activities on a site called Celtic Horizon Offshore Wind Farm (OWF) in the east Celtic Sea. The Celtic Horizon Offshore Wind Farm is located inside the 12 nautical mile (NM) territorial limit (i.e. State owned Foreshore). The Celtic Horizon Offshore Wind Farm project is a key part of Ocean Wind's wider portfolio of strategic offshore wind developments in Ireland.
- 3.2 Based on the above, three plausible landfall locations were shortlisted including the eastern cable route (located from Rostonstown to Ballygrangans), the central cable route (located from Cullenstown to Ramstown), and the western cable route (located from Coxstown East to Brownstown). Figure 3.1 below shows the location of these landfall options for the Celtic Horizon Offshore Wind Farm export cables and the resultant Proposed Cable Route Area. Please note that the image below only presents potential and indicative routes and is only for illustrative purposes only.

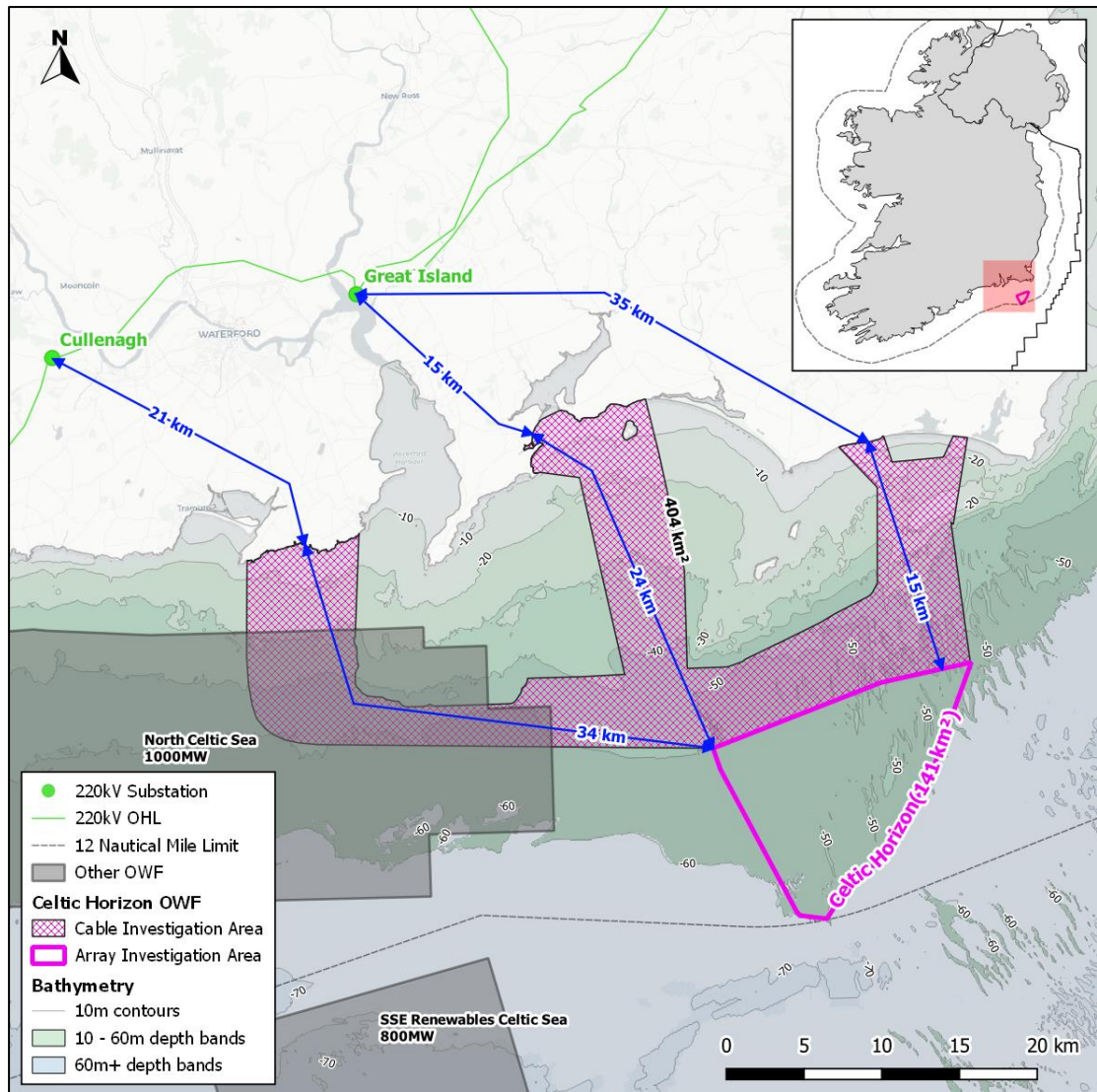


Figure 3.1 – Location of the Celtic Horizon Offshore Wind Farm. (Please note that the image below only presents potential and indicative routes and is only for illustrative purposes only)

Policy Background and Celtic Horizon Alignment

3.3 In June 2019, the Climate Action Plan by the Irish government, announced the target to achieve 70% of electricity production from renewables by 2030. Offshore wind development is a key technology to achieve this target with “at least 3.5GW” to be generated by offshore wind by 2030 as per the action plan. In June 2020, the Programme for Government of the new coalition government increased the target to 5GW of installed offshore wind capacity by 2030. This will be supported by the Renewable Electricity Support Scheme (RESS) which has been developed to support renewable technologies and is key to achieving the target of 70% of electricity from renewable sources by 2030 as set out in the Climate Action Plan, with an offshore specific auction planned for late 2021 and subsequent auctions every 18-21 months thereafter. Ocean Winds and Celtic Horizon Wind Farm project development can be a clear and significant contributor to this policy target and the Climate Action Plan.

4.0 THE MARITIME AREA PLANNING BILL (MAP) AND NATIONAL MARINE PLANNING FRAMEWORK (NMPF) VS THE DRAFT WATERFORD CITY & COUNTY DEVELOPMENT PLAN 2022–2028

- 4.1 On 30th June 2021, the Irish government published a pre-initiation draft of the Maritime Area Planning (MAP) Bill 2021 and also launched the National Marine Planning Framework (NMPF).
- 4.2 The Marine Planning and Development Management Bill (2021) seeks to establish a new consent process for the maritime area which will replace existing State and development consent regimes and streamline arrangements on the basis of a single consent principle i.e. one state consent (Maritime Area Consent) to enable occupation of the Maritime Area and one development consent (planning permission), with a single environmental assessment. In order to obtain authorisation for a proposed maritime usage a prospective developer will be required to apply to the relevant Minister for Maritime area consent (MAC). If such an application is successful, the prospective developer will be granted a MAC, conditional on securing planning permission from a coastal planning authority or An Bord Pleanála. Requirements in respect of environmental impact assessment (EIA), and in respect of appropriate assessment (AA) under the Habitats Directive will be fulfilled in the processing of the application for planning permission. If a proposal does not require planning permission, the EIA and AA assessments/screening will be undertaken by a coastal planning authority or An Bord Pleanála.
- 4.3 In order to support the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF), the Draft Waterford City & County Development Plan 2022–2028 supports the following Coast & Marine Policy Objectives.

Coast & Marine Policy Objectives of the Draft Waterford City & County Development Plan 2022–2028

C&M 01 – Protecting our Coast and Marine:

All development proposals will be required to comply with standards and legal requirements of the following where they apply;

- *National Seascape Character Assessment*
- *NMPF National Marine Planning Framework*
- *Marine Planning and Development Management Bill 2021 and Act when finalised.*

C&M 02 – Marine Assets:

We support the implementation of the National Marine Planning Framework including the identification of Marine Protection Areas in the future management and sustainable development of the Waterford coast and associate maritime area.

C&M 03 – Managing Marine and Coast Areas:

To incorporate the findings of the National Seascape Assessment with the Waterford Landscape Character Assessment to inform future management and sustainable development of the Waterford coast and maritime area.

C&M 04 – Natural Coastal Defences:

We recognise the value of the County's natural coastal defences including estuaries, dunes and sand dunes and ensure their protection from inappropriate development and interference.

C&M 05 – Scenic Coastal Areas:

To protect the scenic value of Waterford's Coastal Zone including landward and seaward views and continuous views along the coastline and manage development so it will not materially detract from the visual amenity of the coast.

C&M 06 – Public Coastal Access

We will facilitate appropriate public access to the coast and the sustainable development of coastal walkways subject to ecological, Habitats Directive and climate risk assessments.

- 4.4. In light of the Coast & Marine Policy Objectives contained within the Draft Waterford City & County Development Plan 2022-2028, Ocean Winds actively supports Waterford City & County Council's vision in implementing and supporting the Maritime Area Planning (MAP) Bill 2021 and the National Marine Planning Framework (NMPF),

5.0 UTILITY, ENERGY & COMMUNICATION POLICIES AND OBJECTIVES OF THE DRAFT WATERFORD CITY & COUNTY DEVELOPMENT PLAN 2022-2028

- 5.1 The Draft Waterford City & County Development Plan 2022-2028 supports the following Utility, Energy & Communication Policy Objective.

Utility, Energy & Communication Policy Objectives of the Draft Waterford City & County Development Plan 2022-2028

UTL 01 – New Development and Strategic Development Growth Areas:

Ensure that new development across the urban and rural settlements of Waterford is infrastructure led in a manner which:

- *Supports communities and economic growth and development,*
- *Enhances environmental quality;*
- *Complies with the tiered approach to land use zoning which underpins the Development Plan;*
- *Encourages and provides opportunities to improve and implement sustainable modes of travel;*
- *Integrates nature-based solutions and climate change considerations into the design, planning, and implementation of infrastructure provision/ works and development proposals;*
- *Incorporates green infrastructure to provide for carbon offset and carbon sinks and wider environmental benefits, including providing shade to alleviate heat stress, supporting urban biodiversity, water retention and flood alleviation;*

- Promotes and integrates energy efficiency and low carbon technologies and solutions; and,
- Ensures sufficient heat density (e.g. compact growth) and diversity of connected heat loads (egg hospital, leisure centre, large retail, electricity production, industry) to facilitate the economic provision, viability and integration/ implementation of low carbon heating technologies in development proposals.

UTL 12 – Energy Strategy/ Masterplan:

Undertake a review/ update of the Waterford Renewable Energy Strategy during the lifetime of this Development Plan, in order to assist in creating evidence-based, realistic and costed pathways for Waterford to achieve its just transition to carbon emission reduction targets to 2030 and 2050.

In addition to comprising an update to the existing renewable energy context and technologies in Waterford, the review will chiefly comprise and provide an overall, integrated Energy Strategy/ Masterplan for Waterford, which takes into account (inter alia):

- A detailed and comprehensive energy assessment, incorporating a Spatial Energy Demand and Generation Analysis;
- Heat mapping which identifies areas for Strategic Energy Zones and District Heating (or other low carbon heating technologies) opportunities to support a just transition to clean energy and a circular economy;
- Identifying specific opportunities and projects, actions and targets associated with improved energy efficiency;
- Lessons learned from the Decarbonising Zone ‘living laboratory’, and the need to advance this concept across Waterford, in line with evolving climate policy and legislative requirements;
- The creation of a smarter local energy model, enabling a smarter, more coordinated approach to planning and meeting distinct local energy needs that will link with developments at the regional and national scale.

UTL 13 – Renewable Energy:

It is the policy of Waterford City and County Council to promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social and economic benefits to Waterford City and County. This will be achieved by:

- Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities in accordance with the Waterford Renewable Energy Strategy, the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these;
- Promote and encourage the use of renewable energy, including micro-generation among business, agriculture, education, health and other sectors;
- Promoting, encouraging, ensuring and facilitating community engagement, participation and implementation of/ in renewable energy projects;

- *Implementing, including in the Council's own activities and in the provision of services/ works, the use and integration of low carbon, renewable energy infrastructure and technologies;*
- *Supporting appropriate options for, and provision of, low carbon and renewable energy technologies and facilities, including the development and provision of district heating (and/ or other low carbon heating technologies); anaerobic digestion and the extraction of energy and other resources from sewerage sludge.*
- *The preparation and implementation of a Climate Action Plan (including adaptation and mitigation measures) for Waterford.*

At initial design stage full consideration should be to reasonable alternatives and existing infrastructural assets. In this regard environmental assessments should address reasonable alternatives for the location of new energy developments, and where existing infrastructural assets such as sub-stations, power lines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.

UTL 14 Energy Developments & Human Health:

Proposals for energy development should demonstrate that human health has been considered, including those relating to the topics of:

- *Noise (including consistency with the World Health Organisation's 2018 Environmental Noise Guidelines for the European Region);*
- *Shadow Flicker (for wind turbine developments, including detailed Shadow Flicker Study);*
- *Ground Conditions/Geology (including landslide and slope stability risk assessment);*
- *Air Quality; and*
- *Water Quality*

UTL 19 – Undergrounding Cables:

Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:

- *Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties);*
- *Short to medium term impacts on the landscape where, for example, hedgerows are encountered;*
- *Impacts on underground archaeology;*
- *Impacts on soil structure and drainage; and*
- *Impacts on surface waters as a result of sedimentation.*

- 5.2. In light of the Utility, Energy & Communication Policy Objective contained within the Draft Waterford City & County Development Plan 2022-2028, Ocean Winds actively supports Waterford City & County Council's vision in implementing and supporting renewable energy development.

6.0 CONCLUSION

- 6.1 The Waterford City & County Development Plan 2022-2028 is an opportunity to define the focus of future investments in the County and to ensure that employment opportunities and the services needed to support them will be delivered. The implementation of Project Ireland 2040 and the Climate Action Plan can deliver a long-term strategic planning and economic framework for the development of the County.
- 6.2 Ocean Winds is available to discuss any aspect of our response if that would be helpful to Waterford City & County Council.
- 6.3 The Council is requested, to include the energy targets for renewable and offshore renewable energy directly under the county development plan as high-level objectives of the county development plan, for prior to 2030 and the targets for after 2030, as set out by the programme for government and associated policy statements.
- 6.4 It is submitted that the council should include the in-principle recognition of the importance of the fact that Bulk Marine Renewable-Energy Infrastructure Development is directly linked, and are critical to the achievements of the governments legal commitment to renewable energy targets for the periods pre-2030, post-2030 and the objective of zero carbon by 2050.
- 6.5 It is submitted that a high level policy be included in the county development plan that a whole of government approach should be followed on the plan, management and future consenting of offshore infrastructure policy as to "fully aligned with economic and social policy objectives" through consultation and discussion, "structured engagement and cooperation across all sectors of the public sector. It would be important to ensure that the county development develops its own level of objectives that directly integrates with the regional and national offshore renewable-energy objectives and not merely refer to the regional and national objectives, such as to create a whole of government integrated approach. A hierarchical tiered policy is required, where local county wide and county marine are wide renewable-energy targets, policy, policy objectives, marine spatial planning zoning designations and clearly formulated decision-making criteria are developed and included directly in the county development plan.
- 6.6 It is submitted that a strategic policy be added to indicate that in order to attract high quality industries like i.e. green linked data centres, green hydrogen and the clean and reliable manufacturing of ammonia fuel as then industries of the present and the future to the county that the development of offshore renewable energy and offshore wind farms need to be supported as these industries are circularly linked. If this can be achieved significant job creation and significant local economic growth with the Green Economy, within the county in industries that are both the present and the future of a sustainable and fully green economy, creating jobs for the next 50-100 years.
- 6.7 It is further submitted that a strategic objective be added that recognise the need for the electricity transmission grid as both a local and regional asset terrestrial and marine

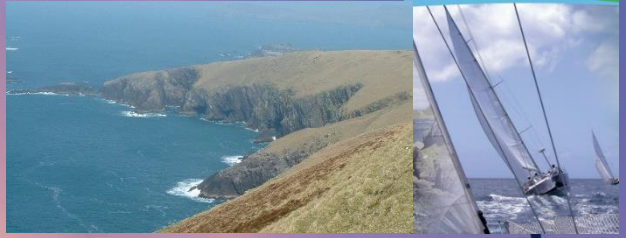
area, that needs to be developed in a sensitive and environmentally sustainable way to facilitate a new "local product" of offshore renewable energy that can be exported or imported to local business interests, exported to the country or abroad with the potential for very significant investment growth in the county and local community.

- 6.8 It is submitted that the county development plan should direct policy objectives to indicate that the council is committed to participate, encourage, facilitate and raise awareness of the need for public participation to during the present and future offshore consent processes that applies and will apply to "Bulk Marine Renewable-Energy Infrastructure Development" i.e. proposed MAC (Marine Area Consenting) leasing and the future "Strategic Marine Renewable-energy Infrastructure Consenting" process (directly similar to the Strategic Infrastructure Development application process) when incorporated under the Planning and Development Act 2000, as amended.
- 6.9 Early consultation and discussion with the marine offshore developers on planned "Bulk Marine Renewable-Energy Infrastructure Development" should be encouraged, with by the Local Council, specifically also when they are not the competent planning authority. The importance of the local council's role as prescribed bodies under the future the "Strategic Marine Renewable-energy Infrastructure Consenting" process (directly similar to the SID consenting regime), should be recognised and adequately resourced in the interest of representing the local community's interest.
- 6.10 It is submitted that the county development plan needs to develop, include and draft text to include decision making criteria and measures to consider the consenting and submissions "Bulk Marine Renewable-Energy Infrastructure Development" as a prescribed body to the future "Strategic Marine Renewable-energy Infrastructure Consenting". projects such as Offshore Wind Farms(bottom fixed and floating wind farms), Offshore and Onshore underground electrical transmission cables and substations, and other associated infrastructure and projects.

It is submitted that "In principle," principle", the local authority should through their terrestrial and future marine area local area plans provide policy and zoning objectives to facilitate the provision of "Bulk Marine Renewable-Energy Infrastructure Development" and energy networks, provided that it can be demonstrated that:

- *The proposed Bulk Marine Renewable-Energy Infrastructure development is a strategic project that will significantly contribute to meeting the local, regional and national renewable energy targets and objectives,*
- *The marine spatial location and marine and terrestrial route proposed have been identified with due consideration for social, environmental and cultural impacts;*
- *The design is such that will achieve least environmental impact consistent with not incurring excessive cost;*
- *Where impacts are inevitable mitigation features have been included.*

- *Where it can be shown the proposed development is consistent with international best practice with regard to materials and technologies, that will significantly contribute to meeting the local, regional and national renewable energy targets and objectives.*



Ocean Winds Ireland:

Osprey Business Centre, Devoy Quarter, Naas, Co. Kildare, W91 X40K

Head Office:

5th floor, Atria One, 144 Morrison Street, EH3 8EX, Edinburgh, UK

www.oceanwinds.com

Registered Office:

Octagon Point, 5 Cheapside,
London, EC2V 6AA

Company Number: 07101190