

Offshore Wind Grid Development Consultation
Energy Division
Department of Communications, Climate Action and Environment
29-31 Adelaide Road
Dublin 2

Sent by email to: OffshoreWind@dccae.gov.ie

22nd July 2020

Re: Offshore Grid Delivery Model Option Consultation

To Whom It May Concern,

An Taisce welcomes the opportunity to comment on the proposed offshore grid delivery model options.

As an overarching issue, we submit that any consideration of an offshore grid delivery model must be fully integrated with the development of the National Marine Planning Framework, which is still in process.

There is a strong need for a harmonised regulatory regime for the marine area, whereby all activity, including offshore renewable energy development, is subject to integrated governance, consent application and public participation processes. This should include the proper application of Strategic Environmental Assessment (SEA) with clearly defined and targeted sustainability actions and as well as provisions for ongoing monitoring. All areas of marine activity must be guaranteed public participation under Aarhus Convention principles, and the ability of the public and environmental non-governmental organisations to obtain procedural and substantive reviews must be ensured. All marine activities must also be subject to the Environmental Impact Assessment (EIA) and Habitats Directive assessment processes.

An Taisce submits that a strategic, plan-driven model for offshore grid delivery would best facilitate the above and ensure that such development occurs in alignment with the Marine Strategy Framework Directive, the Marine Spatial Planning Directive, the SEA Directive, the EIA Directive, and the Habitats and Birds Directives.

A wholly developer-led approach is more likely to cause adverse ecological impacts through uncoordinated development leading to a greater, and potentially unnecessary, proliferation of infrastructure. Crucially, we consider that the assessment of cumulative impacts would be considerably more difficult in such a scenario where grid development is undertaken by individual developers in a more piecemeal manner than would occur under a plan-driven approach.

In light of the above, we would consider Option 3 to be the preferred model. We believe that is critical for the site selection, investigation, and permitting processes to be

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strategically led, yet we also recognise the benefits of developers financing, building and maintaining the wind farms and transmission infrastructure.

We would also highlight that any consideration of a grid delivery model for offshore renewables must take account of the O’Grianna judgment (O’Grianna & Ors. v. An Bord Pleanála [2014] IEHC 632), which determined that energy developments that include a grid connection require integrated assessment between the energy installation and the grid connection itself.

Finally, it is of concern to An Taisce that it appears that no NGOs were included in the list of key stakeholders consulted in the preparation and initial analysis of the proposed models.

Please acknowledge our submission and inform us of any further consultation periods.

Yours sincerely,

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An Taisce – The National Trust for Ireland