

Waterford Offshore Wind Awareness

Consultation to Inform a Grid Development Policy for Offshore Wind in Ireland

22nd July 2020

Consultation Questions

1. Cost levels

To date, no independent cost-benefit analysis to assess total costs (associated infrastructure, grid development, back-up, decommissioning etc) has been published. It is therefore impossible to confidently assess costs and benefits. Plan-led grid development is most likely to facilitate economies of scale and co-ordinated planning. Research indicates that grid development costs can be substantially higher when the location decision is based on private profitability rather than a socially optimal location.

Answer: We recommend Option 4

2. Environmental Impact

As the Marine Institute noted in 2007, developer led legacy projects were chosen on a "*first come first served*" basis with no environmental constraints.

Environmental impacts have not been properly considered under existing outdated and undemocratic legislation, acknowledged to be unfit for purpose and currently under reform. We were shocked to learn that some of these developer-led legacy projects will now be fast-tracked as "relevant projects" in advance of impending reform.

Given that lower cumulative environmental impact is expected to result from the coordination of onshore-offshore transmission works, it seems that a plan led approach would be most appropriate.

Answer: We recommend Option 4

3. Future Proofing and Technologies

Due to widespread concern about the environmental impacts of near shore wind farms, large scale near shore developments are generally no longer proposed internationally. The average distance from shore of offshore wind farms under construction in the EU in 2019 was 59km, compared to an average distance of 10/15 km for legacy projects/ relevant projects proposed for fast tracking off Ireland's coast.

Floating offshore wind is a fast maturing technology which could be particularly suited for Ireland with vast ocean resources.

A state body is better equipped to anticipate the planning horizon, adapt to changing conditions and take a balanced long-term view, ***in the public interest***.

Answer: We recommend Option 4

4. Required Infrastructure

As stated above the responsibility for this must rest with State bodies, charged with acting ***in the public interest***.

Answer: We recommend Option 4

5. Compatibility with Relevant Projects

Compatibility with Relevant Projects should not be a consideration for driving Ireland's grid development policy given the undemocratic nature under which these legacy developer-led projects have been designated "relevant projects".

Answer: We recommend Option 4

6. Social Acceptance

The Irish public who are largely unaware of the large-scale developer-led, near-shore projects proposed for much of our coastlines and the major economic, social and environmental impacts involved.

Experience in other maritime countries shows that landscape/seascape protection is a key issue of public concern, particularly in relation to the development of large-scale offshore wind farms in the coastal zone.

Social acceptance of offshore wind is heavily dependent on size and scale of developments and distance from shore. In Ireland, lax regulation means that no minimum distance from shore was specified by the State and site selection for some of the biggest offshore wind farms in the world proceeded off our coast without consideration for the environmental and landscape impacts.

All the large-scale legacy projects designated as "relevant projects" are well inside the de facto buffer zone, (usually around 22km +) adopted in other EU countries such as Netherlands, Germany, Belgium, and now in USA. In addition, the Environmental Impact Assessments (EIA) of all these projects acknowledge that they will have major adverse visual impact on coastal landscapes.

Allowing developers to pick out sites for large scale offshore wind development with no restriction on size, scale or proximity to shore was totally out of line with good international practice. The Strategic Environmental Assessment of the *National Marine Planning Framework (NMPF)* states '*The main issue associated with the implementation of the draft NMPF is the resulting potential for both direct and indirect impacts on landscape and seascape character, areas of outstanding natural beauty, protected views and similar designations.*' (p95). The Irish Government must now try to remedy this situation by specifying minimum distance from shore, linked to size and scale of development, in line with good international practice.

Answer: We recommend Option 4

7. Facilitating timely development of offshore wind capacity to achieve the 2030 target

The 2030 target has been selected with no public input nor with any cost-benefit analysis. It is based on developers' plans for legacy projects advanced in an undemocratic manner with no environmental constraints. Furthermore, it is out of line with good international siting practice.

The Irish coastline is an invaluable and irreplaceable resource. Given that there is no real imperative, other than political expediency, to develop 5GW of offshore wind by 2030, we strongly recommend that the current reform agenda is allowed to run its course. No offshore wind development in Ireland should be advanced until the NMPF is adopted, the required Seascape Landscape visual impact analysis carried out, a robust MPA network is identified to preserve and restore marine habitats, and a full cost benefit analysis is carried out.

While we are supportive of the need to develop renewable energy under a plan-led, ecosystem and evidence-based approach to the management of our seas to help meet our climate and energy targets, given the absence of any proper environmental and economic assessment of the implications of the 5 GW target by 2030, we question whether the achievement of this target is in Ireland's interest.

Answer: We recommend Option 4

8. Ranking of key drivers in order of Importance

1. Environmental impact (Biodiversity & Landscape)
2. Social Acceptance
3. Cost levels
4. Future proofing of policies and technologies
5. Required infrastructure

9. How important is it for Ireland to develop indigenous offshore wind industry?

Ireland's indigenous industry should focus on emerging technologies such as floating offshore wind, recognised as a future growth area because of the potential to site projects in deeper water away from sensitive near shore areas, hence lessening biodiversity and landscape impacts.

10. Considerations on how to optimize grid connections

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11. Considerations to reduce cost to consumer

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12. Should developer compensation arrangements be provided for delivery of offshore grid connections to renewable projects?

Answer: No

13. Further drivers for Grid Development Model

Answer: Biodiversity Impact and Landscape Impact are particularly important drivers in an Irish context. They must be considered when assessing a grid delivery model.

14. Which grid delivery model is most appropriate for OWF in Irish context?

Answer: Model 4 is most appropriate as an enduring grid delivery model for offshore wind in an Irish context.

15. What should transition look like?

We do not accept the statement that *"a transition towards the chosen enduring grid delivery model will be required to leverage the development of Relevant Projects in the short term"*. We are deeply troubled by the fast tracking of developer-led, near shore wind farms, ("Relevant Projects"), advanced with no environmental constraint and in breach of Irish and EU legislation under the undemocratic Foreshore Act 1933, which has not been acknowledged as unfit for purpose and currently under reform.

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