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'MAC Assessment Criteria' orecc [REDACTED]

Granting of Marine Area Consent

The granting of Marine Area Consent criteria seems to totally ignore visual aspects of the project. While it stipulates geographic coordinates for each project it ignores and provides no guidance on assessing the combined visual effect of the combined number of projects close to the shore. There needs to be coordination of visual effect to ensure that there is not a continuous line over most of the horizon of turbines visible at any place. For example the combined effect of projects of the coast is much greater than each project from the following Arc of View in degrees:

| | Greystones | Bray | Killiney | Dun Laoghaire | Howth | Wicklow Town |
|-----------------|------------|------------|-----------|---------------|-----------|--------------|
| Sea Stacks | 59 | 63 | 63 | 18 | 47 | |
| Dublin Array | 65 | 68 | 68 | 18 | 30 | Plus 16 |
| Codling | 48 | 32 | 26 | 0 | Plus 6 | 44 |
| | | | | | | |
| Combined | 113 | 100 | 94 | 18 | 53 | 60 |

It is implied that this will be assessed by Bord Pleanala at a later stage but this needs to be explicitly stated. There needs to be a gap left between projects off Greystones, for visual reasons, for example and promoters need to be forced to deal with this.

These turbines are likely to be 310m tall, much higher than the main visual feature of the area, Bray Head, which is 240m high. The consent needs to insist on a gap of at least a 15 degree Arc of View Gap, viewed from the most impacted place ,Greystones, between the wind farms to reduce the visual impact.

The Foreshore Consent for the survey should strongly encourage use of Greystones Harbour by under 30m vessels. There is a need to establish a connection and a benefit to the town in terms of business, jobs and trade if we have to have the turbines imposed in a prominent part of the vista.

Cable Survey routes. The plan is to survey cable routes into Dublin. The benefit of 'Green power' should be used to help Wicklow in view of so much of the turbines being off Co.Wicklow. At NewtownmountKennedy, by the 230kv ESB line, there is full planning permission for a data centre which probably has no grid connection offer. A route should be surveyed there for the cable. That site could also be planned to have emergency generating facilities. This would provide an economic benefit to the area in compensation for the visual loss.

General. Windfarms encounter local resistance in very many communities, including loud campaigns against them in Wicklow and other counties. Previous thermal power stations had major local benefits including jobs, trade, substantial rates to provide local services and giving the communities a sense of purpose. This is lacking in offshore wind which will provide few jobs, except where the base is, but will have a large visual effect on a wide area.

Communities need to feel connected to it, need to see the benefit locally from the particular wind farm and be persuaded to accept it, even like it. A sense of ownership not imposition is needed at an early stage.

I represent Greystones, Kilcoole & Newcastle with about 30,000 population, most of whom will see the turbines. About 1,000 people use boats for leisure. 500 or more swim in the sea regularly and 1,000s walk beside it. About 5 people, including skipper & crew, are commercial fishers. The needs of this very small group should not distort the consultation and benefits to be given to the local population.

The **Development & Operational levies** must be spent in the Municipal Districts which will have to look at the turbines. Each wind farm should allocate the levy with input from the MD and must account for it by MD area to show a direct benefit from what residents have to look at.

These wind farms are near the centre of demand for electricity and thus economical. Consequently they are near to and will be seen by large numbers of people unlike most on shore ones which are remote. The towns of Greystones & Bray have invested much in creating promenades, boardwalks and harbours, it is very much a central part of their offering. The proposals must be seen not to damage that.

