



Forward Planning Unit,
Development Plan Review,
Louth County Council, Town Hall,
Crowe Street, Dundalk,
Co. Louth.
A91 W20C

Dublin, December 23, 2020

Oriel Windfarm Limited: Submission on draft Louth County Development Plan 2021-2027

Dear Sirs,

Oriel Windfarm Limited (**Oriel**) welcomes the opportunity to make a submission to on the draft Louth County Development Plan 2021-27.

We note the inclusion of many of the policies of the national Climate Action Plan in the CDP which will enable County Louth to play its part in meeting our national goals for decarbonisation.

About Oriel

Oriel is a privately owned Irish renewable energy company. It is the developer of the Oriel Offshore Windfarm Project, which comprises a proposed offshore wind farm to be located in the Irish Sea off the coast of County Louth. The project will, subject to consent, supply clean renewable energy for over 300,000 homes and can reduce Ireland's carbon emissions by 600,000 tonnes annually. It will deliver significant economic and environmental benefit both locally and nationally.

In October 2017, Parkwind NV, a European offshore wind farm developer agreed a significant investment to become a strategic partner in Oriel. In January 2019, ESB also stepped into the Project, creating a strong partnership with the operational experience and financial backing required to deliver a project of this type.

Parkwind has successfully developed, constructed and currently operates four offshore windfarms located in the Belgian concessions zone in the North Sea. ESB is also active in the offshore wind sector, having made recent investments in under construction projects in the UK.

Project background

Since 2018, the Oriel project team have been updating the Project design and undertaking environmental assessments. The Project was designated with 'Relevant Project' status in February of 2020, from the Department of Housing Planning and Local Government. This means that Oriel will be one of the first projects

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that can apply for development consent consideration under the new Marine Planning and Development Management (MPDM) legislation, once enacted. This places the Oriel project as one of the leaders in the first phase of offshore wind development in Ireland.

Submissions on the County Development Plan

Oriel has reviewed the draft Louth County Development Plan 2021-2027 and considered the policy objectives proposed. Based on the draft Oriel would like to make a number of observations which are presented in the sections below.

1. Strategic Objectives (SO)

SO4 Transition to a low carbon and climate resilient County. Oriel supports this strategic objective and in particular the increased usage of renewable energy through the development of the indigenous energy resources of the County.

10. Infrastructure and Utilities

Oriel supports the renewable energy policies set out in the Infrastructure and Utilities Chapter and, in particular, the support for the development of offshore windfarms subject to normal planning considerations. Louth, through its coastal location, has an important role in the development of offshore renewable energy and can gain significant benefit from its delivery.

Section 10.6.1 presents a paragraph on the opportunities that offshore wind farms could bring to County Louth. This references the servicing of offshore windfarms. The experience elsewhere is that the location of a coastal offshore windfarm brings significant boost to coastal communities not only through long-term direct employment by the wind farm but also through the development of marine support businesses within the region, improvement to existing port facilities, operations and maintenance bases and as an anchor for a clean tech hub to promote other sustainable enterprises within the region. Offshore wind will also bring community benefit through the requirements of government led Renewable Energy Support Scheme and through direct funding to the fishing industry.

Observations on specific policies in this section are:

IU 55 To support the development of offshore windfarm developments subject to normal planning considerations, including in particular the impact on areas of environmental or landscape sensitivity.

Oriel supports this policy. The introduction of the Marine Planning and Development Management legislation and the National Marine Planning Framework will assist in the proper assessment of environmental and landscape sensitivity and enable stakeholder and community engagement in the marine planning process.

IU56 To ensure that terrestrial developments along the coastline provide adequate provision for connection to the national grid for offshore wind farms. Oriel supports this policy; however, it should be noted that offshore wind farms require connection to the high voltage national transmission grid. In County Louth this existing grid infrastructure is set back approximately 20 km from the Louth coast with the requirement for underground cable connection to this infrastructure.

IU67 To support and facilitate the reinforcement and development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the County and Region. This will include the delivery of **the necessary integration of transmission network requirements facilitating linkages of renewable energy proposals** to the electricity and gas transmission grid, in a sustainable and timely manner, subject to appropriate environmental assessment and the planning process.

The recognition of the critical importance of the electricity transmission network in the delivery of Irelands renewable energy targets and the need for modernisation and transformation of this system is welcomed.

11. Environment, Natural Resources and The Coast

Oriel supports the policy objectives:

ENV47 to implement the policies and objectives of the National Marine Spatial Plan; and

ENV 48 to support to the Marine Planning and Development Management (MPDM, once enacted) a single development management process for certain project types (including offshore renewable energy development).

The National Marine Spatial Plan has been implemented through the preparation of the National Marine Planning Framework and it is suggested that this Framework is referenced in this section.

12. Climate Action

Oriel considers that the inclusion of a specific section on Climate Action in the 2021-2027 CDP and the adoption in 2019 of Louth County Council's Climate Change Adaptation Strategy (CCAS) strengthens the Plan. The inclusion of the targets from the national Climate Action Plan (CAP) into the CDP is welcomed and the table indicating how the policies within the CDP address the CAP targets is useful.

Environmental and Consents Manager

Oriel Windfarm Ltd.