



Fuinneamh Sceirde Teoranta

Sceirde Rocks Offshore Wind Farm Foreshore Licence Application Policy Support Statement

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1 Introduction

Xodus Group Ltd (Xodus) has prepared this report on behalf of FST in support of an application for a Foreshore Licence under Section 3 of the Foreshore Act 1933, as amended, to carry out a site investigation campaign within the Foreshore Licence Area of the Sceirde Rocks Offshore Wind Farm. Sceirde Rocks Offshore Wind Farm Limited intends to undertake a survey campaign at the proposed Foreshore Licence Area in order to inform the location and design of the proposed offshore wind farm.

Sceirde Rocks Offshore Wind Farm is a fixed bottom offshore wind farm off the West Coast of Ireland and under the Transitional Protocol is recognised as a Relevant or Phase One project. As such, Sceirde Rocks Offshore Wind Farm is a high priority project and it is anticipated that this project will be prioritised through the Foreshore License process, the MAC award process and subsequently will be one of the first projects eligible for the first ORESS-1 auction. Sceirde Rocks Offshore Wind Farm will be targeting an accelerated delivery programme for this offshore project to meet government renewable energy targets pre-2030. This application specifically relates to a foreshore license for site investigation activities in the wind farm array area only.

This document has been prepared to demonstrate how this application for a Foreshore Licence and the associated site investigation works facilitate and are consistent with Irish Offshore Renewable Energy (ORE) and supporting policy, with a particular emphasis placed on the National Marine Planning Framework (NMPF). Also discussed briefly are the Programme for Government: Our Shared Future (PfG) (2020), Climate Action Plans (CAP) (2019 & 2021), the Offshore Renewable Energy Development Plan (ORED, 2014), and EirGrid's Shaping Our Electricity Future Roadmap (SOEF) (2021).

This document should be read in conjunction with the following documents which form the Foreshore Licence application:

- Investigative Foreshore Licence Application (Offshore Renewable Energy) Form;
- Schedule of Activities;
- Report to inform Appropriate Assessment Screening (Document Reference L100725-S00-A-REPT-005);
- Environmental Assessment and Environmental Impact Assessment Screening Report (including Annex IV species risk assessment) (Document Reference L100725-S00-A-REPT-006); and
- Natura Impact Statement (Document Reference L100725-S00-A-REPT-007).



2 POLICY SUPPORT STATEMENT

2.1 The National Marine Planning Framework (2021)

The NMPF is a national plan for Ireland's seas, setting out, over a 20-year horizon, how we want to use, protect, and enjoy our seas. The NMPF sits at the top of the hierarchy of plans and sectoral policies for the marine area. The NMPF establishes a vision for the future development of the marine planning system towards 2040. It will play an important role in supporting both the short-term recovery and the longer-term planning for our maritime area, to have a lasting positive effect on our most significant natural resource.

The NMPF is Ireland's first comprehensive marine spatial planning framework, as required under the Maritime Spatial Planning (MSP) Directive 2014/89/EU. Member States establishing and implementing MSP must consider economic, social and environmental aspects to support the sustainable development and growth of the maritime sector.

The NMPF is also a parallel document to the National Planning Framework, which guides strategic terrestrial planning and development, and it is important that each is consistent with the other, as well as regional and local plans.

The high-level objectives laid out in the NMPF in relation to ORE include:

- To support the development of ORE in Ireland;
- To make Ireland a leader in climate action through reaching ORE targets;
- To increase the sustainable ORE use of our extensive marine resource;
- To support Ireland's decarbonisation journey through increased use of ORE; and
- To provide enhanced security of supply.

This Foreshore Licence application seeks to carry out site investigation works which may inform the design and development of an offshore wind farm, which would contribute to all of the above NMPF objectives, and bring economic, social and environmental benefits to the country and local coastal communities.

Chapter 13 of the NMPF sets out 11 policies in relation to ORE, some of which developers must comply with, and others which are aimed at the various regulatory authorities that operate in Ireland's maritime area. The policies that are deemed relevant to this Foreshore Licence application are discussed below (Table 2.1) to further demonstrate how this Foreshore Licence application is consistent with the NMPF.

Other ORE Policies contained in the NMPF were not considered applicable to this Foreshore Licence application as they are at ports (ORE Policy 7), policy makers (ORE Policy 10), offshore wind farm permissions (ORE Policy 9) and proposals impacting ORE Test projects (ORE Policy 5).

FST believe the details above, along with the content of Table 2.1, demonstrate that this Foreshore Licence application is consistent with both the high-level objectives of the NMPF, and the relevant ORE Policies.



POLICY	DESCRIPTION	DISCUSSION	CONCLUSION
ORE Policy 1	Proposals that assist the State in meeting the Government's offshore renewable energy targets, including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported. All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology and other maritime users.	The site investigation activities being applied for in the Foreshore License Area are being carried out with a view to supporting and informing the development of the proposed Sceirde Rocks Offshore Wind Farm. Should the investigations find the area suitable for the development of an offshore wind farm, this project could directly contribute towards the 2030 5GW target and a shift away from fossil fuels. In addition, the results of the site investigations will be used to in the Environmental Impact Assessment that accompanies the Sceirde Rocks OWF consent application which will help ensure compliance with environmental standards and minimise impact on the marine environment.	The site investigation activities are consistent and compliant with ORE Policy 1.
ORE Policy 2	Proposals must be consistent with national policy, including the OREDP and its successor. Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime. Into the future, areas designated for offshore energy development, under the Designated Maritime Area Plan process set out in the Maritime Area Planning Bill, will underpin a plan-led approach to consenting.	The Foreshore Licence Area lies within the 'West Coast' zone identified and assessed under the Offshore Renewable Energy Plan (OREDPA) (2014). Sceirde Rocks OWF is also a Phase 1 (Relevant) Project. The site investigations will inform the design of the Sceirde Rocks offshore wind farm that could assist the delivery of the Government's 2030 targets, feeding into National Policy outlined in the Programme for Government: Our Shared Future and Climate Action Plans (2019 and 2021), among others.	The site investigation activities are consistent and compliant with ORE Policy 2.



POLICY	DESCRIPTION	DISCUSSION	CONCLUSION
ORE Policy 4	Decisions on ORE developments should be informed by consideration of space required for other activities of national importance described in the NMPF.	It is not clear what type of decisions this policy refers to. Assuming 'decisions' refers to the decision to grant licences/consents or designate zones in the maritime area, this policy is applicable to Regulators. It would therefore not be applicable to FST submitting this Foreshore Licence application. However, 'decisions' could also refer to the initial decision to progress a project's site investigations, and therefore could be seen to apply to this Foreshore Licence application. Activities of national importance described in the NMPF include aquaculture, defence and security, energy, fisheries, ports, harbours and shipping and others. Fishing activity may overlap with the Foreshore Licence Area. FST has appointed a Fisheries Liaison Officer (FLO) to engage with local fishing communities to determine the full extent of fishing effort in the Foreshore Licence Area, and to minimise disruption to the activity. Furthermore, consistent stakeholder engagement will be carried out as part of the application process and project development to ensure due consideration is given to other activities of national importance described in the NMPF.	The site investigation activities are consistent and compliant with ORE Policy 4, assuming the Policy is applicable to developers.



2.2 Other Relevant Policies

While an important emphasis is placed on demonstrating how this Foreshore Licence application is consistent with the NMPF, several other policies are also considered relevant. The following sections demonstrate how this Foreshore Licence Application is consistent with other relevant ORE policies in Ireland.

2.2.1 Programme for Government: Our Shared Future (2020)

The PfG raised the 2030 3.5GW offshore wind target set in the CAP 2019 to 5GW. This Foreshore Licence application is consistent with this policy target, with the site investigation activities a required step to developing an offshore wind farm project which can contribute to this renewable energy target. In addition, this Foreshore Licence application relates to a Phase 1 (Relevant) Project which significantly increases its importance to achieving this target.

There are a number of other targets and ambitions contained in the PfG which this Foreshore Licence is consistent with, including delivering 70% renewable electricity by 2030, lowering our reliance on fossil fuels, reducing emissions by an average of 7% per annum to 2030, and supporting the European Green Deal.

2.2.2 Climate Action Plans (2019 & 2021)

The CAP 2019 was an important document for ORE Policy in Ireland and set a number of targets which offshore wind projects will be needed to contribute to, most notably setting 3.5GW offshore wind and 70% renewable electricity targets for 2030. This was an important step in giving more certainty to industry on ORE development plans this decade. A commitment was also made in CAP 2019 to increase the electrification of our economy, setting ambitious targets of circa 600,000 heat pumps and 950,000 electric vehicles by 2030.

The CAP 2021 built on the foundations set by the CAP 2019. The 3.5GW target was increased to 'at least 5 GW' (as indicated in the PfG), and the 70% RES-E target was increased to 80%. A commitment was also made to decrease emissions in the electricity sector from 10.6 Mt in 2018 to ~ 2 – 4 Mt in 2030.

Offshore wind will be a cornerstone to the achievement of the targets above, and others included in the CAP 2019 and 2021, showing the consistency between this application and CAP 2019 and 2021. This Foreshore Licence application is consistent with this policy, with the site investigation activities a required step to developing an offshore wind farm project which can contribute to these renewable energy targets.

2.2.3 Offshore Renewable Energy Development Plan (2014)

In advance of completion of work on the OREDP 2, this Foreshore Licence application can only look at the first iteration of the OREDP, released in 2014. The OREDP identifies the opportunity for the following:

- The sustainable development of Ireland's abundant ORE resources;
- To increase indigenous production of renewable electricity;
- To contribute to reductions in our greenhouse gas emissions;



- To improve the security of our energy supply; and
- Creating jobs in the green economy.

This Foreshore Licence application is consistent with the achievement of all of these opportunities. As indicated earlier, the Foreshore Licence Area is also located in a zone assessed under the OREDP and earmarked for Offshore wind (West Coast Zone).

2.2.4 Shaping Our Electricity Future Roadmap (2021)

While not strictly a government policy document, the Shaping Our Electricity Future (SOEF) Roadmap published by EirGrid in November 2021 is an important document which outlines how Ireland's transmission system will be developed this decade to enable Ireland to achieve on 2030 renewable ambitions.

The roadmap shows a clear reliance on offshore wind to reach these ambitions, with upgrades identified to facilitate the full CAP 2021 5GW target. The roadmap also identifies available capacity for offshore wind on the west coast of Ireland, where the proposed Sceirde Rocks Offshore Wind Farm, which will be developed following completion of the site investigations activities proposed in this Foreshore Licence. will have its grid connection.



3 CONCLUSION

FST strongly believe that this report demonstrates clearly how the site investigation activities proposed in this Foreshore Licence application align with the objectives of the following key government policies:

- National Marine Planning Framework (NMPF);
- Programme for Government: Our Shared Future (PfG) (2020);
- Climate Action Plans (CAP) (2019 & 2021);
- Offshore Renewable Energy Plan (ORED, 2014); and
- EirGrid's Shaping Our Electricity Future Roadmap (SOEF) (2021).