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**From:** [REDACTED]  
**Sent:** 10 January 2020 14:48  
**To:** 'O'Reilly, Karen'  
**Subject:** RE: WCC Development Plan - Issues Paper - SSE response

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review.

Mise le meas,

[REDACTED]  
Planning, Development and Environment.

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**From:** O'Reilly, Karen [REDACTED]  
**Sent:** 10 January 2020 14:14  
**To:** Planning - Plan Review  
**Cc:** Young, John  
**Subject:** WCC Development Plan - Issues Paper - SSE response

Good afternoon,

Please find attached SSE's response to the *Wicklow County Development Plan – Issues Paper* consultation. If you have any questions, we would be happy to arrange a call or visit your office to discuss further.

Kind regards,

Karen

**Karen O'Reilly | Corporate Affairs**

[REDACTED]

Red Oak South | South County Business Park | Leopardstown | Dublin 18 | Ireland



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**WICKLOW COUNTY COUNCIL**

**SSE RESPONSE TO**

**Public consultation on Wicklow County Development Plan – Issues Paper**

**JANUARY 2020**

## About SSE

At SSE, we are committed to playing our part in ensuring society realises the ambition of the Paris Climate Agreement to bring net greenhouse gas emissions down to zero. Since 2008, SSE has invested over €2.5 billion in growing our energy business here – creating jobs in Ireland, sustaining employment, driving competition and greening our economy. Our 29 onshore wind farms have a combined generation capacity of 740MW, making us the largest generator and provider of renewable energy in the integrated all-island Single Electricity Market.

Our portfolio includes Ireland's largest onshore wind farm, the 174MW Galway Wind Park, which was jointly developed with Coillte. We forecast that Galway Wind Park will produce over 600GWh of green energy each year – enough renewable energy to power over 140,000 Irish homes, the equivalent of every home in Galway City and County and offsetting over 220,000 tonnes of harmful CO<sub>2</sub> emissions.

As a leading developer and operator of offshore wind energy in Great Britain, we believe offshore wind has the potential to transform Ireland's ability to respond to climate change. SSE is currently progressing the development of a consented offshore windfarm of up to 800MW off the coast of Co. Wicklow - Arklow Bank Wind Park Phase 2<sup>1</sup>. SSE will invest around €1-2bn in capex to develop the project which could generate around 1.75TWh annually. EirGrid estimate that electricity demand in Ireland will increase between 25-47% in the next 8 years<sup>2</sup>, with the most significant growth being along the East Coast; an area which can be ideally served by the new wind park.

## Introduction

SSE wishes to make this submission for consideration as part of the *Wicklow County Development Plan – Issue Paper* consultation. SSE welcomes the publication of this draft and supports the central role that County Development Plans will play in implementing the National Planning Framework (NPF) which aims to guide spatial planning while prioritising objectives including compact growth, sustainable mobility and the low carbon transition. Local authority planning will also be crucial to ensuring Ireland can deliver the objectives of the Government's Action Plan to Tackle Climate Disruption.

We would like to highlight the following areas for consideration.

## Reflecting climate action in local authority planning

Alignment and consistency in relation to climate action is critically important. The Climate Action Plan commits to reaching 70% renewable electricity by 2030 through doubling Ireland's onshore wind capacity and installing at least 3.5GW of offshore wind. Arklow Bank Wind Park will allow County Wicklow to make a significant contribution towards this offshore wind target, putting the county in a leading position nationally in regard to its response to climate change. Offshore wind development will also bring significant socio-economic benefits to the County, which we have outlined later in our response. The Climate Action Plan also aims to drive the decarbonisation of heat and transport through electrification with ambitions for 1 million EVs and 500,000 deep retrofits by 2030.

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<sup>1</sup> In 2004, SSE and GE co-developed Phase 1 of the Wind Park which consists of 7 turbines with an installed capacity of 25 MW; this is Ireland's only offshore wind farm.

<sup>2</sup> EirGrid All-island Generation Capacity Statement 2019: <http://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Group-All-Island-Generation-Capacity-Statement-2019-2028.pdf>

SSE welcomes the priority given to climate action in the East and Midlands Regional Assembly Regional Spatial and Economic Strategy (RSES) and the 16 Regional Strategic Outcomes described in the strategy which are aligned to those identified in Ireland's NPF and the UN's Sustainable Development Goals. We welcome the EMRA's identification of climate action as a key principle underpinning the region's RSES.

These priorities and objectives need to be reflected in Wicklow's County Development Plans. Failure to prioritise implementation of the appropriate policy measures at a local level will only increase the costs of measures in the future and exacerbate the impacts of climate change.

### **Aligning national, regional, local and marine planning**

Alignment between national, regional and local planning policies is of critical importance to all those involved in infrastructure development. Consistency at local authority level is needed to provide clear guidance for wind energy project promoters and other stakeholders, who make large investments in bringing to planning phase projects which will support Ireland in meeting its climate targets.

The electricity sector has been one of the most successful at decarbonising due in large part to the deployment of onshore wind. Emissions related to the power generation sector have approximately halved since 1990. With the rollout of a new Renewable Electricity Support Scheme (RESS), wind energy – onshore and offshore – will play a key role in Ireland achieving its 70% renewable electricity target.

### **Onshore wind**

In the case of onshore wind, EMRA RSES RPO 7.35 states that planning policy at a local authority level should adhere to the Wind Energy Guidelines, the DCCAE Code of Practice for Wind and other relevant policy. This needs to be clearly reflected in Wicklow's County Development Plan. While the changes proposed in the draft Wind Energy Guidelines may present challenges for wind development, we would encourage their consistent application. Divergence at a local level creates uncertainty for developers and makes the proposition of seeking permission for new wind farms a challenging prospect. As a responsible developer, SSE is committed to best practice in developing our projects. Clear standards enable us to progress projects with confidence; unclear standards discourage investment. We strongly believe in playing our part by contributing to the social, environmental and economic well-being of communities surrounding all of our wind farms and operate community benefit funds for all 29 of our wind farms in Ireland. To date, we have given over €6.5m to community projects close to our wind farms across the country.

### **Offshore wind**

Integrated land and sea planning is also critical. We believe offshore wind in particular presents a significant opportunity for Co. Wicklow and the East Coast as conditions in the Irish Sea are particularly conducive to fixed-bottom offshore wind turbines. SSE is currently progressing the development of Arklow Bank Wind Park Phase 2, a consented offshore windfarm of up to 800MW off the coast of Arklow, Co. Wicklow. The wind park is ideally located to feed large energy demand centres along the East Coast.

We recently completed the construction of 588MW Beatrice Offshore Wind Farm off the coast of Scotland. The construction of the offshore wind farm has delivered significant local economic benefits including increased local spend in the region during construction, hotel use particularly during the winter months and a significant uplift in income and employment. There was gross average of 890 people

employed during the construction phase as well as sustained operations roles. In addition, the project represents a £2.6bn investment which is expected to add £1.13bn to UK GDP<sup>3</sup>. We aim to bring the benefits of offshore wind, such as these, to County Wicklow with our proposed development at Arklow Bank Wind Park.

An offshore wind industry in Ireland can deliver sustained economic benefits to County Wicklow while contributing to the decarbonisation of the Irish economy. SSE will invest between €1bn and €2bn in capital investment to develop the project which could generate around 1.75TWh annually. In Great Britain, it has been estimated that every 1GW of offshore wind capacity installed delivers an economic boost of €2bn to the economy<sup>4</sup>. SSE estimates that a development on the scale of Arklow Bank Wind Park could sustain around 80 operation and maintenance (O&M) jobs once the project moves to its operational phase. Typically, this could involve a range of companies within the O&M supply chain, including vessel services, wind turbine technicians, fuel, technical inputs, and loading and unloading of project cargoes. Arklow Bank Wind Park will also bring benefits to the county in the form of increased commercial rates.

EMRA RPOs 6.19 and 7.1 and the National Marine Planning Framework seek to ensure consistency and alignment between land and ocean-based planning. We believe this should be clearly reflected in Wicklow's County Development Plan as offshore wind development requires the construction of enabling onshore infrastructure such as substations, port/harbour and grid infrastructure which need to be taken account of. In order to facilitate the expansion of offshore wind generation the grid itself will require development and expansion. It's important that these strategic pieces of infrastructure are protected from inappropriate development in the surrounding area and their scope for further development and interconnection is maintained and facilitated by Wicklow County Council.

Port infrastructure will also need to be upgraded to facilitate offshore wind development. This has the potential to stimulate new employment, investment opportunities and supply chain development. The operation and maintenance for Arklow Bank Wind Park Phase 2 will be located in either Arklow Harbour or Wicklow Port. Given the anticipated scale of investment in Phase 2 there will be a significant level of personnel and support services to support the wind farm. SSE is assessing location options for the new base which will result in targeted investment in the early 2020's. Given the scale of investment in offshore wind it is expected that the socio-economic benefits will not be restricted to the chosen port and that there will also be further benefits and opportunities for areas and towns all along the Wicklow coastline.

### **Energy efficiency and the electrification of heat**

SSE believes that energy efficiency should be seen as a critical infrastructure priority in Wicklow's County Development Plan. Energy efficiency not only helps Ireland achieve its climate action objectives, it also reduces energy bills and improves health and social inclusion. The Climate Action Plan contains ambitious plans to improve energy efficiency and drive the electrification of Ireland's housing stock with 500,000 deep retrofits. Meeting our EU obligations and the ambition set out in the Climate Action Plan will require the establishment of a new delivery model. 'A very significant scaling up of effort, capacity, investment and engagement' will be needed to deliver our energy efficiency goals as acknowledged in Ireland's draft National Energy and Climate Plan<sup>5</sup>.

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<sup>3</sup> Beatrice Socio Economic Impact report: [http://sse.com/media/475202/Beatrice-Socio-economic-impact-report-v2\\_BME\\_FINAL\\_200717.pdf](http://sse.com/media/475202/Beatrice-Socio-economic-impact-report-v2_BME_FINAL_200717.pdf)

<sup>4</sup> ORE Catapult (2017), 'The economic value of offshore wind': <https://ore.catapult.org.uk/app/uploads/2017/12/SP-0012-The-Economic-Value-of-Offshore-Wind-1.pdf>

<sup>5</sup> Draft National Energy and Climate Plan – Ireland <https://www.dccae.gov.ie/en-ie/energy/consultations/Documents/42/consultations/Draft%20NECP%20Ireland.pdf>



SSE believes that the electrification of heat has a significant role to play in realising Ireland's decarbonisation potential and reducing air pollution. We welcome the ambitious plans for heat pump installation in the Climate Action Plan. The on-going decarbonisation of electricity supply and recent innovations in electricity based renewable technologies including air source pumps, make electricity an attractive option as the clean, low carbon energy choice for heating.

A partnership approach and continued collaboration between energy suppliers, the SEAI and local authorities will be vital given the scale of energy savings required in the next decade. We are proud of the work we have undertaken with Local Authorities to date and look forward to continuing this as part the 'one-stop-shop' to energy efficiency being developed. We believe Wicklow's County Development Plan should reflect Action 64 in the Climate Action Plan which seeks to introduce minimum BER standards in the Local Authority social housing stock as part of retrofit works being carried out on older stock or refurbishment of vacant dwelling.

### **Electrification of transport**

Transport as a sector is one of the significant contributors to our national Green House Gas (GHG) emissions. The need to transition to a low carbon society by reducing transport usage and move to lower carbon options is a key aspect of Ireland's response to climate change. We welcome the ambition to have one million Electric Vehicles on Ireland's roads by 2030. Spatial planning will be critical to achieving this. Funding for the deployment of targeted electric vehicle charging infrastructure across the region will be vital to meet the changing needs of commuters with particular emphasis in public parking areas and employment locations.

### **Conclusion**

The Wicklow County Development Plan is an opportunity to define the focus of future investments in the County and to ensure that employment opportunities and the services needed to support them will be delivered. The implementation of Project Ireland 2040 and the Climate Action Plan will deliver a long-term strategic planning and economic framework for the development of the County.

SSE is available to discuss any aspect of our response if helpful to Wicklow County Council.