



DEPARTMENT OF HOUSING, PLANNING AND LOCAL GOVERNMENT

SSE RESPONSE TO

Public Consultation on National Marine Planning Framework - Baseline Report

DECEMBER 2018

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1. Introduction

SSE welcomes the publication of the Marine Spatial Plan (MSP) baseline report and is pleased to respond to this initial consultation on the development of Ireland's marine spatial planning framework. As an island nation with sovereign rights over one of the largest marine areas in Europe, marine spatial planning is crucial to ensuring Ireland can enjoy and benefit from its marine environment. Developing a thriving maritime economy, nurturing healthy ecosystems and strengthening our engagement with the sea continue to be important goals for marine planning as outlined in Ireland's first plan, Harnessing Our Ocean Wealth in 2012.

As a leading developer of offshore wind, we would strongly urge the government to ensure that our MSP facilitates the sustainable development of Ireland's offshore wind capacity. Offshore wind, the costs of which are falling globally, is a proven technology which can be delivered at a scale large enough to make a significant leap towards Ireland's renewable energy targets with single projects. Offshore wind development will not only help Ireland reach its climate targets, reduce reliance on fossil fuels, and improve air quality, it will also bring significant socio-economic benefits.

A step-change is needed to ensure Ireland is able to tackle climate change, as recommended by the Citizens' Assembly who considered the topic earlier this year. The Sustainable Energy Authority of Ireland (SEAI) projects that Ireland is on track to miss its 2020 renewable energy target by 2-3 percentage points¹. This shortfall is reflective of our broader performance on climate change. This month, the Climate Change Performance Index, identified Ireland as the worst country in Europe when it comes to tackling climate change². While Ireland's Climate Change Advisory Council confirmed that our greenhouse gas emissions are increasing, not falling, and warned we are 'completely off course' in addressing climate change. These warnings come against the backdrop of the Intergovernmental Panel on Climate Change's (IPCC) special report in October 2018 highlighting the threats posed by climate change at a global level and the need for urgent action³.

Ireland's new climate and energy targets are set to be more stretching as a result of the EU's third clean energy package. In keeping with this, the Irish Government has indicated a renewable electricity target of 55% by 2030 (Renewable Electricity Support Scheme, High Level Design). This will likely be included in Ireland's Draft National Energy and Climate Plan (NECP) to be submitted to the European Commission by the end of 2018. In our submission to the government's initial consultation on Ireland's NECP, we recommended a renewable energy target of 70%⁴. To meet our 2030 national renewable energy target, it will be necessary to build a large quantity of renewable capacity quickly. Offshore wind can meet that challenge

¹ SEAI report: 'National Energy Projections to 2030: Understanding Ireland's energy transition' November 2018: https://www.seai.ie/_uid/53c5db52-b9d9-456e-aca5-02a5544b6bc7/National-Energy-Projections-to-2030.pdf

² German Watch: 'Climate Change Performance Index: <https://www.climate-change-performance-index.org/the-climate-change-performance-index-2019>

³ Climate Change Advisory Council, Annual Review 2018: http://www.climatecouncil.ie/media/CCAC_AnnualReview2018.pdf

⁴ Baringa / IWEA report, 'A 70% renewable electricity vision by 2030' <https://www.iwea.com/images/files/70by30-report-final.pdf>


as acknowledged by Denis Naughten the Former Minister for Communications, Climate Action and the Environment. He stressed that there were “huge opportunities in the offshore sector” and that he believed that offshore renewables would be “critical if we are going to achieve our 2030 objectives” In order to achieve this, we have called for a specific MW target for offshore wind development to be included in Ireland’s National Energy and Climate Plan.

Although Ireland has one of the strongest offshore wind resources in the world; it is the only country in Northern Europe not currently developing its offshore wind capacity. That is because there has not been a regulatory framework or a route to market for offshore wind in Ireland. The RESS HLD is a welcome start but Ireland’s MSP also has an important role to play. A marine spatial planning framework can help pave the way for the development of offshore wind by providing a decision-making framework for public bodies involved in consenting for marine development activities. To that end, Ireland’s MSP should:

- **Adopt a policy-based approach to development** to ensure the most economically viable sites are developed. This is needed to underpin the success of Ireland’s marine industries. As such the MSP should include a presumption in favour of offshore renewables where appropriate, similar to that included in the Northern Ireland draft MSP⁵. Adopting an open, policy-based approach will ensure that the market is in a position to identify prime sites that can be developed in the most cost competitive way. This should support lower bids price in the Renewable Electricity Support Scheme (RESS) auctions. If the state pre-identifies sites for auction, there is a risk that the sites will not ultimately be attractive to developers or deliverable. SSE believes that a policy-based approach will afford Ireland the flexibility to benefit from the best offshore wind sites, whilst ensuring acceptable co-existence with other maritime uses.
- **Allow developers, within the parameters identified in the marine spatial plan to identify sites for development.** This approach, as we envisage it would mean that sites would be open for applications for development, but that a limited number of sites or uses would be protected or assigned, for example strategic defence. Applications for development should be robustly assessed through the consenting and permitting process, in line with the objectives and against criteria set out in the MSP and the Offshore Renewable Energy Development Plan (OREDPP).
- **A non-prescriptive approach to allow for MAFA powers to be exercised.** We look forward to the implementation of a new consenting regime in parallel with the introduction of Ireland’s first MSP. While we would caution against a rigid zoning or defined site approach in Ireland’s MSP, we recognise that the Maritime Area Foreshore Amendment (MAFA) Bill provides the Minister for energy with powers to create renewable energy zones, within which the primary objective will be the production of renewable energy. If the government intends to exercise these powers, our position is that Ireland’s MSP should not be prescriptive in its approach

⁵ Draft MSP for NI, 2018 <https://www.daera->

[ni.gov.uk/sites/default/files/consultations/daera/Marine%20Plan%20for%20NI%20final%2016%2004%2018.PDF](https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Marine%20Plan%20for%20NI%20final%2016%2004%2018.PDF)



in order to ensure the Minister has the flexibility to engage with industry stakeholders to identify suitable renewable energy zones.

Our response to the specific questions in the consultation can be found below.

2. Response

Question 1

This Baseline Report is intended to capture and summarise all of the sectoral activities that are taking place in Ireland's marine spaces. Thinking about your own knowledge and experience, are there any gaps in what is presented in this report and, if so, how can they be addressed?

The plan appears to have identified all of the sectoral activities in Irish waters to the best of SSE's knowledge.

Question 2

Thinking about how we enjoy, protect, or derive economic or social benefits from our seas, what things would you like the marine plan to address?

As an Island nation our ocean has been and continues to be a key element of our lifestyle and economy. SSE believes that Ireland's MSP should seek to protect and enhance these social, cultural and economic benefits. Our MSP should also lay the groundwork for the development of new maritime industries. Ireland's established maritime industries include shipping, tourism, fishing and aquaculture. These industries deliver real economic benefits for the Irish economy. For example, in 2017 the seafood industry employed over 14,500 people and Irish exports grew by 10% on the previous year, valued at €666m⁶. The sector also creates employment in both indigenous and export markets and supports a large number of supply chain companies which are often smaller ancillary companies that provide services to the mainstream operators.

SSE believes that an offshore wind industry in Ireland can deliver its own sustained economic benefits while contributing to the decarbonisation of the Irish economy. In Great Britain, it has been estimated that every 1,000MW of offshore wind capacity installed delivers an economic boost of €2bn to the economy⁷. To support this in Ireland, a coordinated multi-use approach, with a presumption in favour of responsible development should be facilitated through Ireland's MSP.

Question 3

Do the Marine Plan Objectives broadly capture or reflect the things that you want to see in the plan? If not, and in the context of the high-level nature of these overarching objectives, are there additional objectives that should be included or should the draft plan be amended?

SSE welcome the sustainable development and climate change objectives proposed in the MSP. The inclusion of objectives promoting sustainable coastal and island communities, integrated land and sea interactions and an ecosystem-based approach to marine planning are also welcome. It is essential that the development of our marine resources is compatible with the achievement of Good Environmental Status as required by EU legislation. The sustainable development of our marine resources would support Ireland's priorities in relation

⁶THE BUSINESS OF SEAFOOD 2017 A Snapshot of Ireland's Seafood Sector.

<http://www.bim.ie/media/bim/content/publications/corporate-other-publications/7097-BIM-Business-of-Seafood-2017.pdf>

⁷ ORE Catapult (2017), 'The economic value of offshore wind'

to climate change mitigation and decarbonisation as laid out in the Climate Action and Low Carbon Development Act (2015). It would also build on Ireland's National Planning Framework which identifies transition to a low carbon and climate resilient society as a national strategic outcome. Offshore renewable energy is identified as presenting 'major opportunities' with National Policy Objective 42 committing:

'To support, within the context of the Offshore Renewable Energy Development Plan (OREDPA) and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements'⁸

In 2004 Ireland was a leader in offshore wind deployment with the development of the 25MW Arklow Bank Wind Park Phase 1 project. Since then, other nations have leapt ahead using marine spatial planning as a key enabler. The benefits of reflecting clear offshore wind objectives in marine spatial planning can be seen in our nearest neighbour, Great Britain (GB), which now has the largest offshore wind market in the world. A clear objective has also driven development in the Netherlands who have identified offshore wind as an activity of national interest in their marine spatial plan. The spatial planning system in the Netherlands is designed to help ensure the efficient use of space, reduce costs and accelerate the roll-out of wind energy at sea.

The case for supporting ORE development in Ireland's marine spatial plan is strong as it will help:

- a) achieve our decarbonisation objectives;
- b) meet generation capacity and demand growth;
- c) support FDI and local economic development and;
- d) lead to social and community benefits

a) Decarbonisation targets and climate change mitigation

Mitigating the impact of climate change is imperative for Ireland and we are on the back foot as described earlier in our response. The European Union's third Clean Energy Package will increase the EU's overall renewable energy target to 32 per cent by 2030 to which Ireland will need to contribute. Delivering large scale offshore renewable energy projects will deliver carbon abatement benefits and boost our renewable energy potential significantly, enabling Ireland to meet these more ambitious 2030 targets, avoid costly fines and deliver on the commitments made in the Climate Action and Low Carbon Development Act (2015). The objectives laid out in Ireland's MSP need to be consistent with achieving these overarching commitments and targets.

b) Generation capacity and demand

To meet the 55% renewable target outlined in the RESS by 2030, KPMG estimate Ireland will need to deploy between 400 – 700 MW of new renewable generation capacity per year. The current deployment rate for wind has been 200 – 250MW per annum⁹. If we continue at the current rate, the gap to 2030 is estimated to be between 1 – 2 GW of renewable capacity. SSE

⁸ Project Ireland 2040: National Planning Framework

⁹ KPMG Report: 'Offshore Wind: Ireland's Economic and Social Opportunity': <https://home.kpmg.com/ie/en/home/insights/2018/11/offshore-wind.html>

sees offshore wind as the go-to technology to deliver the additional renewable capacity needed which is why a clear objective in support of the development of offshore wind needs to be included in Ireland's Marine Spatial Plan.

In an analysis of various future energy scenarios, EirGrid estimated that Ireland's total electricity requirement will increase by between 22% and 53% by 2030¹⁰. This increased demand will need to come from renewable sources in order to satisfy both national and EU targets, as well as CSR agendas of large corporates and FDI. KPMG estimate that up to 1000MW of offshore wind resource in the Irish Sea is deliverable in the immediate future, with c. 3000MW additional potential there¹¹. This needs to be facilitated to ensure we meet our renewable targets and demand.

c) Economic benefits

Offshore wind development will not only help Ireland reach its climate targets, reduce reliance on fossil fuels, and improve air quality, it will also bring significant economic benefits. We have seen a number of FDI companies, particularly data centres seek out locations with green energy. In order to continue to attract this type of investment, Ireland will need to increase the share of renewables on the system.

The development of offshore windfarms will also create jobs and derive local economic benefits as evidenced in the UK. The UK's offshore renewable industry is fuelling vital investment in manufacturing and the wider domestic supply chain, building vibrant economies and supporting thousands of skilled jobs. While Ireland is a smaller and less mature market, we believe the potential benefits for Ireland's economic development are significant. According to the SEAI's Wind Energy Roadmap, onshore and offshore wind could create 20,000 direct installation and Operation and Maintenance jobs by 2040. According to SEAI, offshore wind represents a significantly greater employment opportunity than onshore wind post-2025¹².

d) Social and Community Benefits

Offshore wind can drive revitalisation of coastal communities. We've seen this with projects across Europe through jobs and supply chain benefits but also through community investment. We already invest significant amounts in communities in proximity to our wind farms across Ireland through the SSE Airtricity Community Fund. Since 2008 we've awarded over €6.5 million in community funding on the island. These funds are distributed to local activities and projects with a focus on energy efficiency, safety, social and environmental sustainability. The focus on communities is set to grow over the next decade with the new RESS placing a greater focus on community engagement and benefit.

¹⁰ EirGrid, 'All-Island Generation Capacity Statement 2018-2027'

¹¹ KPMG Report: 'Offshore Wind: Ireland's Economic and Social Opportunity':
<https://home.kpmg.com/ie/en/home/insights/2018/11/offshore-wind.html>

¹² SEAI report: 'Wind Energy Roadmap 2050'
https://www.seai.ie/resources/publications/Wind_Energy_Roadmap_2011-2050.pdf

Question 4

The objectives of a marine plan can be supported or achieved in a number of ways. Some countries have used a policy-based approach to guide the decisions of statutory consent authorities with respect to specific sectoral developments or activities. Others have opted for a more prescriptive zoning approach (similar to on land zoning through County Development Plans in Ireland). Taking account of the extent of Ireland's marine area and the varying degrees of activity that take place in our waters what do you think would be the most appropriate means of supporting the objectives of Ireland's marine plan – prescriptive, policy or somewhere in between?

Harnessing Our Ocean Wealth (HOOW) is regarded as Ireland's 'first' integrated plan for the development of our maritime area. The document was published in 2012 and reviewed in 2017. It clearly identifies offshore wind as a future growth opportunity and sought to support its development to commercial stage. Since then, Ireland has stagnated while the offshore wind industry across Europe has developed, with technological advances and policy certainty driving the industry.

In 2014, the Irish Government published its Offshore Renewable Energy Development Plan (OREDPA) which sets out a vision for an Ireland where our offshore renewable energy resource contributes to our economic development and sustainable growth and generates jobs for our citizens. This vision must be supported by coherent policy, planning and regulation, and managed in an integrated manner. A mid-term review of the OREDPA was completed in 2017, the next version of the plan will need to be progressed and should emulate the approach and objectives set out in the MSP.

These policies support the development of offshore wind in a responsible and economically beneficial way. These objectives must be facilitated through the MSP to enable Ireland to realise its potential.

APPROACH FOR IRELAND

Looking to other EU countries such as UK, Germany, Netherlands and Belgium who have developed thriving offshore wind industries through their marine spatial planning approaches there is a common theme; an initial 'developer-led' approach transitioning to a 'defined-site' approach. For clarity, a developer-led approach would allow developers to propose a site for consideration by the consenting authority in line with a set of policy principals. A defined-site approach would see the Government or a nominated body identifying sites for development that are then allocated to companies to develop.

For Ireland and its burgeoning offshore wind industry, developers need to be able to identify the prime development locations and to apply to construct offshore wind in these areas. From a MSP perspective this would see applicants choosing a location and applying to the Government for permission in line with policy-based principals it has defined. These should be complementary to the strategic objectives set out in the MSP, supporting national ambitions.

A policy-based approach

Ireland has a thriving maritime economy with strong aquaculture, fisheries and shipping. These industries have developed over time in areas where the conditions were conducive to development and for commercial reasons. The same criteria for investment exists for the offshore renewable energy industry.

The MSP should include a presumption in favour of offshore renewables similar to that included in the Northern Ireland draft MSP¹³. SSE believes that this will afford Ireland the flexibility to benefit from the best offshore wind sites, whilst ensuring acceptable co-existence with other maritime uses. This approach, as we envisage it would see the MSP identify areas where certain development could not take place, for example, in areas utilised for defence and national security purposes. Any areas outside these designated parameters should be open to applicants for development projects. The MSP should also identify areas where it is possible for marine users to co-exist in line with an ecosystem based approach to development. Applications should be assessed in line with the objectives set out in the MSP, OREDP and Irelands NECP. A large degree of analysis goes into identifying sites as suitable for offshore wind projects, eg wind resource, sea bed analysis, ecology studies etc, and these assessments will change over time as new technology emerges. We believe that a zoning approach could fail to identify appropriate sites and stifle the development of the industry. In addition, congestion does not arise as an issue in Irish water so we believe it should be possible to facilitate multiple shared uses through the consenting process; an outcome that zoning may threaten.

SSE is aware that MAFA would provide for the Minister with responsibility for energy to create renewable energy zones, within which the primary objective will be the production of renewable energy. If the government intends on exercising these powers, the MSP itself should not be prescriptive in its approach thereby ensuring the Minister has the flexibility to engage with industry stakeholders to identify suitable renewable energy sites through the OREDP revision process and in line with the principles identified in the MSP

Other commentators in the marine industry have raised the issue of exclusion zones for development within the MSP. An approach such as this could have unintended consequences, as any crudely defined exclusions would not be in keeping with an ecosystem-based approach which encourages multiple marine uses. It could also result in Ireland not be capable of utilising new technologies and lead to the exclusion of areas without taking account of real-time and longitudinal data on the marine area.

For example, sites far from shore are, in general, more expensive from both a capital investment and operation perspective and may be a less suitable environment for energy infrastructure. All offshore infrastructure requires ongoing maintenance. Travelling long distances will mean additional cost which will impact the commercial viability of projects. For this reason, SSE believe that a policy-based approach providing for the development of economically viable sites, is needed to underpin the success of Ireland's marine industries.

¹³ Draft MSP for NI, 2018 <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Marine%20Plan%20for%20NI%20final%2016%2004%2018.PDF>

Question 5

How can the marine plan be best aligned with the NPF?

Ensuring consistency and alignment between marine and national spatial planning is essential. Infrastructure projects like offshore wind require construction both on and offshore. It is essential therefore that commitments made in Ireland's marine spatial plan are reflected and facilitated in regional economic and spatial strategies and local authority county development plans.

The National Planning Framework (NPF) emphasises the importance of aligning maritime and national spatial planning through National Policy Objective (NPO) 38 which says '*Regional, metropolitan and local development plans will take account of and integrate relevant maritime spatial planning issues*'. In addition, consistency between maritime and terrestrial planning in areas of common interest is identified as a key aim of the NPF.

To ensure alignment between the NPF and MSP, we believe the government should consider the following:

- The independent Office for the Planning Regulator which will be established in accordance with the Planning and Development (Amendment) Act 2018 with responsibility for evaluating and assessing regional economic and spatial plans and local authority development plans. They will also have the power to make statutory observations and recommendations on the content of such plans with a view to ensuring that these plans are consistent with national and regional policies. The remit of the Office for the Planning Regulator should also cover marine spatial planning policy to ensure consistency in our approach to both national and marine spatial planning.
- The Office for the Planning Regulator should ensure that public officials in Ireland's regional assemblies and local government have access to training and development in relation to maritime resources and marine spatial planning.

Question 6

How can Ireland's marine plan be used as part of Ireland's climate change adaptation measures?

Ireland's MSP can contribute towards sectoral climate adaptation plans by ensuring that areas including our fisheries industry, communications system and archaeological heritage are developed and managed in such a way as to enable them to adapt to the impacts of climate change. The MSP can help drive adaptation at a local level.

SSE believes that marine spatial planning shouldn't just be seen in the context of climate change adaptation but also climate change mitigation. Ensuring that Ireland's MSP facilitates the development of offshore wind will reduce our carbon emissions therefore mitigating against climate change.

Please see our executive summary and answer to question 3 for further information on the benefits of offshore renewable energy development.

Question 7

Which measures do you think should be put in place to support optimal transboundary (including cross-border with Northern Ireland and with other parts of the UK) cooperation on marine planning?

Government departments should ensure their respective activities do not negatively impact on another state. Parameters for cooperation with Northern Ireland and other nations are laid out in the National Planning Framework. Similar steps should be taken for the marine area. There is existing MOU¹⁴ between the UK and Irish Government and the NI Executive to cooperate on use of the seabed in border jurisdictions. This arrangement should remain in place.

In addition, Government should be cognisant of the potential to create a less attractive development option within its jurisdiction in favour of another regime. Europe's offshore wind industry is mature with significant opportunities for investors. Ireland will need to compete with these jurisdictions for investment. When we look out to 2030 in Europe there is an ambition to install upwards of 70GW of offshore wind. The UK is also looking to maintain its position as leader in offshore wind installation with over 30GW by 2030. Germany, France and the Netherlands are following suit with clear targets set for 2020 and beyond. Therefore, barriers and obstacles should be minimising in so far as possible to ensure Ireland is an attractive environment for developers.

Question 8

What infrastructure investments needs to be made in order to maximise the sustainable potential of our ocean resource?

The bulk of investment required to support the offshore wind sector will come from private industry or be allocated as part of a wider programme of electricity grid investment. Developers will invest in the turbines and offshore connection, supported by the RESS. Onshore electricity system upgrades, where required will be delivered through the grid development plans approved by the Commission for the Regulation of Utilities. Ancillary investments decision for ports and other shore-side infrastructure will be made by port authorities once certainty on the project pipeline materialises.

An example of this is the investment by Galway Harbour in shore side facilities to accept turbines deliveries for the Galway Wind Park constructed by SSE and Coillte. The Harbour Authority decided to invest in facilities to manage the delivery of turbines into Galway Harbour once demand was clear. Since completing the upgrade the harbour has received deliveries for a number of windfarm developments on the west coast.

SSE believe a firm signal in support of developing Ireland's offshore wind potential in Ireland's MSP and would send a clear signal to ports and supply chains that business opportunities exist.

¹⁴ Memorandum of Understanding between the UK and ROI Governments on Offshore Renewables

Question 9

Environmental Assessment will be an important part of the preparation of the Ireland's draft marine plan and the plan itself. What are the relevant significant issues to be addressed by the SEA and AA processes and what environmental objectives should be used?

The SEA and AA processes examine the environmental aspects of the plan. The parameters are well established. We believe the existing approach is sufficient.

Question 10

This document is an important milestone in the development of a single national marine plan for the entirety of Ireland's marine area. Thinking about the delivery of forward planning goals, what do you think would be the appropriate spatial hierarchy for future marine planning; for example, regional marine planning, a coastal zone or bay approach?

SSE believes that the Department should focus on developing a national marine spatial plan which protects our marine resources and provides certainty to investors who wish to embark on the sustainable development of projects. Following this, sectoral plans such as Ireland's OREDP should be revised and updated. Regional and coastal planning may not be necessary in all instances as robust analysis of individual development consenting applications will take account of the peculiarities of any site. Ireland is starting the marine spatial planning process later than other EU countries and needs to make rapid progress in this area. We should therefore seek to provide clarity at a national level so that action can be taken to achieve Good Environmental Status, climate change mitigation and the potential of Ireland's marine resources is realised.

Question 11

What levers are needed to deliver greater efficiencies in administration and governance, when it comes to implementing and monitoring the NMPF?

The NMPF should provide certainty and predictability for those seeking to develop in the maritime space through clear objectives. The process for assessment of applications, timelines and requirements should be clear with the required resources in each of the relevant Departments and agencies. Timely decision making will support development. Where decisions are delayed investors may decide to locate elsewhere. A clear NMPF will minimise the risk of this happening.

Question 12

What are the key indicators for measuring the successful implementation of the NMPF?

Ireland's NMPF should be measured against objectives or strategic outcomes in keeping with the approach taken with the National Planning Framework. In terms of the outcomes, the NMPF should seek to achieve, SSE would recommend:

- Delivering a predictable framework that attracts investment and sustainable utilisation of our marine resources;

- Providing guidance to those making applications for consents or leases on whether the proposed use is likely to be permitted, or any mitigations that might be required.
- An increase in the use of ORE contribution to Ireland’s energy and climate target and the associated drop in emissions;
- Reinvigoration of coastal communities through the socio-economic benefits of marine development and community funding schemes.

3. Conclusion

As Minister English stated in the foreword to the baseline report, Ireland’s National Marine Planning Framework should be “strategic, concise and informed”¹⁵. This is something SSE supports and believes a plan that underpins responsible development, delivered in conjunction with those who use marine resources will support sustainable growth for Ireland. Implementation of a strategic, concise and informed plan is key to support sustainable growth for Ireland.

Climate change is one of the defining issues of our time. Ireland is a signatory to the Paris Agreement which sets the course to 2050 and will support the long-term decarbonisation of the economy. The Government is developing a National Energy and Climate Plan for Ireland which will outline our strategy to 2030. This will be all the more challenging as we are currently behind on our 2020 targets. Ireland needs to make a radical change in its approach to climate change mitigation measures and we believe developing our offshore wind resource can deliver in this regard.

Scenarios for 2050 taking account of the Paris agreement all implied very significant changes to our energy system – offshore wind will need to play a pivotal role as onshore development becomes more difficult. The Marine Spatial Plan should support this development providing clarity on the approach and objectives to allow both developers and the necessary supply chain make investment decisions to support Ireland’s decarbonisation efforts.


4. About SSE

At SSE we’re proud to make a difference. From small beginnings we’ve grown to become Ireland’s second largest energy provider, supplying green electricity and natural gas to over 800,000 homes and businesses on the island. Through our retail arm, SSE Airtricity, we’re proud to provide 100% green energy¹⁶.

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 28 onshore wind farms have a combined generation capacity of 720MW, making us the largest

¹⁵ National Marine Planning Framework, Baseline Report 2018, DHPLG
https://www.housing.gov.ie/sites/default/files/publicconsultation/files/national_marine_planning_framework_baseline_report.pdf

¹⁶ * 100% green energy based on Fuel Mix Disclosure and CO2 Emissions for 2016, published by the Commission for Regulation of Utilities (CRU), October 2017. Largest provider of 100% green energy claim based on Retail Market Reports published by the CRU for the periods Q1-Q4 2016.



generator and provider of renewable energy in the integrated all-island Single Electricity Market. Our portfolio includes Ireland's largest onshore wind farm, the 169MW Galway Wind Park, which we 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, offsetting over 220,000 tonnes of harmful CO2 emissions.

SSE is a leading developer of offshore wind in Great Britain with 319 MW of operational capacity and a further 4GW in development stage. We are currently developing the 588MW Beatrice wind farm in Scotland which is expected to power approximately 450,000 homes. In Ireland SSE developed Arklow Bank Wind Park Phase 1 in conjunction with GE. The project, located off Co. Wicklow, is Ireland's only offshore wind farm. As a leading developer and operator of offshore wind energy in Great Britain, we believe offshore wind has the potential to be a game-changer in Ireland if the right policy environment is put in place.