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9th August 2024

An Bord Pleanála
64 Sráid Mhaoilbhríde
Baile Átha Cliath 1
D01 V902

Re: Fingal SID/04/24 ABP-319866-24 North Irish Sea Array
(submitted online)

A chairde,

I strongly support the development of offshore renewable energy including in the Irish Sea.

I would like to submit observations on one aspect of this project, that is the routing of the cable from the turbine array to the Belcamp electricity substation.

As you will be aware from the application, and from the submissions from the local community, the proposed routing will cause severe disruption to all forms of road travel in the areas affected, including disrupting bus routes, active travel routes, access to schools, etc.

The applicant's documentation describes two alternative options for the cable route as being ruled out, but presents very little analysis to justify those exclusions.

The most obvious is the use of the motorway between Balbriggan and Clonsaugh. The applicant simply says that Transport Infrastructure Ireland won't agree to its use. They do not analyse the environmental impact of this route. The following is at p. 5-43 of the EIAR:

"M1 Motorway - it is TII's policy not to permit high-voltage electrical cables to be routed along motorways. Thus, a route along the M1 was disregarded as a feasible option."

That blanket refusal is contrary to Government policy and in conflict with the duties of public bodies under s.15 of the Climate Action and Low Carbon Development Act. The overall obligation (s.15(1)(d) and (e) of the Act) to perform functions in a manner consistent with the furtherance of the national climate objective and the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State is

clearly engaged. However the obligation to perform functions in a manner consistent with the most recent approved climate action plan (s.15(1)(a)) is specifically relevant to this question in light of the provisions of the 2024 Climate Action Plan (CAP24).

Section 12.4.1.1 Accelerate Renewable Electricity Generation of CAP24 includes the following:

“To reach 80% of electricity demand from renewable sources by 2030:

...

- *“All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution;”*

The other route which appears to have been ruled out, is the use of a sea cable southwards to the area off Portmarnock beach. From there, the cable could, subject to the necessary analysis, potentially share a route inland to Clonshaugh with the proposed effluent pipeline from the proposed sewage treatment plant known as Greater Dublin Drainage Project. The planning application for that proposed sewage treatment plant is currently with An Bord Pleanála and can be found online at <https://www.gddapplication.ie/planning-documents/> .

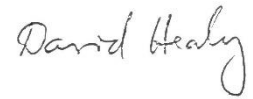


(map from <https://www.water.ie/projects/local-projects/greater-dublin/overview>)

I am copying this observation to both Transport Infrastructure Ireland and Uisce Éireann.

Thank you for considering the above observations.

Best regards,

A handwritten signature in black ink that reads "David Healy". The signature is written in a cursive style with a large, looping 'y' at the end.

Cllr. David Healy