

~~12 March 2024~~ ~~26 February 2024~~

Ref: BLW001-FLO-PMG-STK-POL-0001

Email Subject Title: Draft Offshore Renewable Energy Future Framework Policy Statement

Dear Department of the Environment, Climate and Communications (DECC),

**DECC Offshore Renewable Energy Future Framework Policy Statement
Consultation response**

Flotation Energy Ltd (“Flotation Energy”), in a joint venture partnership with Cobra Instalaciones y Servicios, S.A (“Cobra”) aims to develop projects in Irish waters. We welcome the opportunity to respond to the public consultation on the Draft Offshore Renewable Energy Future Framework Policy Statement (‘Future Framework’).

Flotation Energy is an experienced floating offshore wind developer, whose founders were instrumental in the development and delivery of the Kincardine Floating Offshore Windfarm and are currently progressing the development of;

- White Cross, a 100 MW floating demonstration project in the UK Celtic Sea;
- Blackwater, a floating project in the Irish Celtic Sea
- Morecambe, a commercial scale 480 MW fixed based project in the Irish Sea.
- In addition, as part of a separate joint venture, Flotation Energy is also progressing two floating offshore wind projects in Scottish waters in Crown Estate Scotland’s Innovation and Targeted Oil and Gas (INTOG) decarbonisation round.

We strongly support Ireland’s ambition to deliver greater levels of offshore wind within its waters. The ambition of 20 GW by 2040 and 37 GW by 2050 are encouraging goals to work towards. As experienced offshore wind developers we are very keen to play our part in meeting those ambitions and helping Ireland capitalise on floating offshore wind opportunities.

The Future Framework is a key policy document that should shape the strategy for offshore wind development in Ireland beyond 2030, and can help provide certainty and encourage developers and the supply chain to invest in Ireland’s offshore wind sector. It is, therefore, a concern that the Future Framework does not entirely deliver on the ambitions it sets out to address.

The Future Framework sets out actions to assess the potential for floating offshore wind and to investigate the feasibility of a floating offshore wind demonstrator site. Flotation Energy and Cobra see Ireland as a key opportunity for offshore wind and, as previously

12 March 2024~~26 February 2024~~

shared, we believe the case for a floating offshore wind demonstration project is key in enabling Ireland to realise the supply chain and economic benefit from floating offshore wind. Our response sets out an approach to delivering a viable and competitive demonstrator project.

We hope that our response will provide useful information and comments on this critical component of offshore wind policy in Ireland. As active members of Wind Energy Ireland ("WEI") we have contributed to the WEI response, and we would encourage consideration of those comments also.

We welcome any opportunity to meet with Mr Eamon Ryan TD, Minister for the Environment, Climate and Communications and the Future Framework development team to discuss our response and our proposed offshore wind projects in Ireland.

Yours sincerely

[Redacted signature]

[Redacted contact information]

~~12 March 2024~~ 26 February 2024

Draft Offshore Energy Future Framework Consultation

Question 1

1(a). Has this section adequately identified the general key priorities for ORE delivery in Ireland? Are there additional priorities that should be integrated into the holistic, plan-led approach?

Ireland is a key location for future development of offshore wind in Europe and has a considerable opportunity to benefit economically, socially, and environmentally from the growth of the offshore wind sector.

The Draft Offshore Renewable Energy Future Framework Policy Statement ("Future Framework") has identified the key technical and socio-economic issues that should be considered as part of the framework to deliver offshore wind at Ireland's ambitious scale and timeline. However, the Future Framework does not provide enough detail or clarity about processes or timelines to explain how these issues will be addressed.

Whilst all the issues identified will need to be tackled, the Future Framework should prioritise the items that will provide confidence and assurance to the sector and allow projects to develop. Rather than delivering the current Future Framework as set out, we suggest (as per the WEI response) that a high-level document setting out the priorities and key actions is published shortly, and a more detailed framework developed in collaboration with the offshore wind developer community. This approach will provide the high-level information needed by developers now to give confidence in the process to plan, develop and consent a project in Irish waters ensuring that those currently committed to the Irish market continue to plan and develop projects.

We recommend that the high-level version focuses on the process and timeline for Designated Maritime Area Plans ("DMAPs"), consenting and maritime areas consent, route to market and, most importantly, a clear and actionable route to deliver floating offshore wind to capitalise on that new market as early as possible.

12 March 2024~~26 February 2024~~

1(b). Has each key priority been adequately described and considered all relevant components?

Many of the key priorities have been adequately described and considered and the plan-led approach is welcomed. However, this is not sufficient to deliver the high level of certainty needed to set a robust pathway to deliver Ireland's renewable energy targets and ensure success for the Irish offshore wind market.

We instead suggest it is critical that the Future Framework sets out the detail of the future DMAP process, including locations, timeline and the structure of the DMAPs. It is crucial that this planning programme is appropriately resourced to allow DMAPs to be developed concurrently, not sequentially. An alternative approach to multiple DMAPS could include a national map with designated locations (i.e. the south coast DMAP, east and west DMAP) all considered together. This would streamline the process by removing multiple maps, multiple strategic environmental and socio-economic assessments and reduce the consultation. Data collected for one region can instead be collected at a national scale. It may be useful to complete the south coast DMAP and then undertake the rest together in this way.

Management of the environment and addressing environmental concerns will be best addressed through the DMAP process. It is therefore vital that future DMAPs (individually or collectively) are robust and appropriately assessed to allow projects to proceed with a clear understanding of the key issues for project level Environmental Impact Assessment. In this way, the Future Framework should also set out the intended future capacity for a given DMAP/location to provide a clear pathway to the 2040 and 2050 targets.

Similarly, the Future Framework should set out the selection criteria for DMAPs and the engagement strategy. As this cannot be resolved in the short timeframe allowed for the consultation and final report, the high-level document could set out the number and nature of the DMAPs while the later document will provide the detail, in consultation with the sector. The DMAPs should also be progressed as technology neutral plans, which would allow both fixed and floating developments to progress alongside each other and help accelerate the floating offshore wind opportunity (also discussed below).

It is noted that the current Future Framework model does not allow any room for project attrition in its ambition to meet the 2040 and 2050 targets. DMAPs should be suitably scaled to account for attrition.

DMAPs, and related maritime spatial planning processes should include provisions or policy around multipurpose projects. However, the plans should not require multipurpose activity as numerous factors may make this impractical, including environmental impacts.

12 March 2024~~26 February 2024~~

<p>1(c). How best should the 2GW of non-grid limited offshore wind capacity be procured?</p> <p>No comment.</p>
<p>1(d). What are your views on the design parameters for the successor scheme to ORESS, what else should/should not be considered?</p> <p>The Maritime Areas Consents (“MAC”) and new processes to provide access to the seabed should be tied to the DMAP timelines and begin as soon as possible after DMAP adoption. MACs and the ORESS replacement should be separated to allow the market to adequately respond to the changing markets and costs. The recent examples from the UK (AR5) and USA Offshore Wind Auctions have shown that changing markets can negatively influence projects and result in not just project attrition, but investors leaving entire markets.</p> <p>Competitive MAC processes within adopted DMAPs, similar to the ScotWind leasing process in Scotland, provides certainty to the applicants and will help streamline delivery of viable projects. In contrast, tying the MAC process and the ORESS process together at an early stage requires a substantial conjecture on behalf of the applicant, well ahead of financial investment decisions, which in turn, increases risk and should be avoided.</p>
<p>1(e). What frameworks and/or supports are required for alternate routes to market such as CPPAs, Power-to-X projects, interconnector-hybrid projects and export projects?</p> <p>Route to market is critical for all offshore wind projects. While Flotation Energy does not believe a fully off-grid solution is possible or preferred at this time, options to provide power directly to services or via interconnectors could be beneficial for new offshore wind proposals, given grid constraints. Accordingly, the legislation and policies should be in place to allow these off-grid markets to operate. Legislation for interconnectors and multipurpose interconnectors should allow various designs of project to progress in Irish waters and where necessary, that legislation should not prohibit access to ORESS or it's replacement, for example offshore wind projects also acting as interconnectors should be allowed to apply etc.</p> <p>It is vital that all options are left open to allow the development of novel approaches to delivering projects and that these are supported by appropriate policy and legislation. As successful developers in Scotland's Innovation and Targeted Oil and Gas (INTOG) leasing round, Flotation Energy has first-hand experience of the opportunities and challenges faced by innovative development approaches.</p>
<p>1(f). What additional capacities and responsibilities should be held by industry in the context of the plan-led approach?</p> <p>No comment.</p>

~~12 March 2024~~ ~~26 February 2024~~

1(g). How can Government facilitate a more comprehensive and streamlined engagement process with developers to ensure national ORE targets are delivered?

Robust consultation requires that time is taken to listen to and learn from those with existing knowledge of the industry to ensure delivery of a sustainable renewable industry.

The renewable sector is keen to help facilitate that ORE targets are delivered and invest time and resources now to ensure it is possible. However, we are concerned that the Future Framework does not entirely deliver on the ambitions it sets out to address.

The short timeline to publish a final version of the Future Framework will leave little time for feedback to be fully considered and incorporated into this important framework, that will determine the way forward for all offshore wind development in Ireland post 2030. The valuable input, experience and knowledge of the offshore wind developer community should be given the opportunity to help develop the framework. Time should be taken post-consultation to reflect on the comments received, engage closely with relevant developers and industry bodies to deliver a framework that has full support from the industry.

Question 2

2(a). What grid infrastructure should be of particular focus in facilitating the build-out of capacity to support ORE generation targets?

Grid capacity should be allocated to innovation or demonstration projects that advance the ORE Generation targets.

2(b). In relation to National Security/Department of Defence interaction with ORE development, are there any issues you would like to highlight?

Interaction with Defence departments is a common factor of offshore wind development globally and can be managed effectively. National security and defence interactions with offshore wind must be identified and addressed as early as possible. These should be factored into the DMAP process now. Potential interference with radar (civilian and military) and navigation should be mitigated as far as possible through the spatial planning phase, allowing projects to progress. Mitigation measures, where avoidance is not possible, should be set out clearly in the plan so that projects can take this into consideration as early in development as possible.

~~12 March 2024~~ 26 February 2024

Question 4
<p>4(a). What structures, measures, and interventions can the state and state agencies implement to assist in the development of a long-term, sustainable skills and workforce pipeline? Provide any recommendations on what the State can do to promote careers in ORE across a range of educational backgrounds and movement from other relevant sectors.</p>
<p>The just transition to net zero must ensure and enable that new sectors and supply chain opportunities do not negatively impact other sectors nor exclude people from benefitting from the changes. The MAC and replacement ORESS process should consider the inclusion of non-price criteria that require applicants to set out their plans to promote social value and increase skills and learning opportunities within projects through programmes such as graduate schemes, internships and funded research etc. Good examples are available from The Crown Estate and Crown Estate Scotland.</p>
<p>4(b). Are you aware of initiatives in other jurisdictions or at a European level that would be relevant to Ireland's ambition of building a sustainable skills and workforce pipeline for offshore wind?</p>
<p>The Offshore Wind Industry Council (OWIC) and Scotland Offshore Wind Energy Council (SOWEC) have spent a great deal of time looking at these issues and their examples should be considered. Initiatives such as the Strategic Investment Models (SIM) and the Skills Passports should be considered by Ireland to help shape supply chain development and skills transfer methods and initiatives.</p>
<p>4(c). To what extent should an emphasis be placed on multipurpose sites for ORE delivery, including the colocation of devices? What Government structures should be developed to encourage and facilitate progress in this aspect?</p>
<p>DMAPs, and related maritime spatial planning processes should include provisions or policy around developing multipurpose projects. However, the plans should not require multipurpose activity as numerous factors may make this impractical, including environmental impacts or technological readiness, ultimately delaying development.</p>
<p>4(d). How can Government ensure policy is kept in line with evolving technological innovation and developments in ORE devices? What structures and government procedures should be implemented to future-proof the ORE planning process and account for technological shifts?</p>
<p>As an experienced floating offshore wind developer, undertaking early development of projects within the South Coast DMAP, we welcome the ambition presented in the Future Framework as it sets out significant ambition for floating offshore wind in Ireland.</p> <p>The document mentions learning opportunities from France, however, the Round 5 Celtic Seas leasing process in English water will also provide valuable information. This will offer further learning, and supply chain development, opportunities for Ireland and its floating offshore wind market.</p> <p>The Future Framework sets out actions to assess the potential for floating offshore wind and to</p>

12 March 2024~~26 February 2024~~

investigate the feasibility of a floating offshore wind demonstrator site. Flotation Energy would like to see this detailed further. Ireland is very suitable for floating offshore wind, but this must be managed appropriately to access and sustain the supply chain benefits and deliver viable, cost-effective projects.

For Ireland to support research and innovation projects to accelerate the development of nascent technologies, such as floating offshore wind, the Future Framework should include outline details of the process to deliver a floating offshore wind demonstration project. We consider the most effective way to do this would be accept proposals for a floating demonstration site within the current DMAP which can accelerate deployment of the site due to existing and advanced development and evidence collection. To fully maximise floating offshore wind in Ireland, build a supply chain capable of competing with other locations and deliver sufficient projects to meet the stated capacity ambitions, the demonstrator project must commence with haste.

Delivering the demonstrator project in anything but the south coast DMAP will mean longer delays and increased likelihood of supply chain competition from elsewhere. As above, the DMAPs should be treated as technology agnostic and a demonstrator project (around 200 MW) should be incorporated in the south coast DMAP so that it can progress and help build capacity in the supply chain as soon as possible.

A competitive MAC process should be established to let developers identify a suitable location within the already progressed DMAP for delivery of the demonstrator project at pace. This process should be based on non-price factors such as experience, development schedule and supply chain criteria to select a project that can progress quickly, and kick start the floating offshore wind supply chain.