Consultation Response

DECC’s Public Consultation on Draft South Coast Designated Maritime Area Plan (DMAP)

14th June 2024

CORIO

Introduction

Corio Generation welcomes the opportunity to respond to the public engagement consultation on the Draft South Coast DMAP published on the 3rd of May 2024. We welcome the Department of the Environment, Climate and Communications' (DECC's) indication that this feedback will contribute to the subsequent finalisation of the South Coast DMAP.

About Corio Generation

Corio Generation is a specialist offshore wind business dedicated to harnessing renewable energy worldwide. With our leading industrial expertise and deep access to long-term capital, we work closely with our partners in the creation and management of projects from origination, development and construction, and into operations.

Corio Generation is a portfolio company of Macquarie Asset Management operating on a standalone basis, with a project pipeline of over 30 GW.

Activities in Ireland to date

Corio Generation is already an active offshore wind developer in the Irish market, with the **Sceirde Rocks Offshore Windfarm** which it is developing off the West Coast of Galway, through the Irish and Gaeltacht based company, Fuinneamh Sceirde Teoranta (FST). FST is a joint venture owned by Corio and global infrastructure investor Ontario Teachers' Pension Plan.

In May 2020, Sceirde Rocks was designated as one of seven 'Relevant Projects' by the Department of Environment Climate Action and Communications as part of its plans to support the build out of 5 GW of offshore wind by 2030. Sceirde Rocks is the only commercial scale fixed bottom offshore wind project on Ireland's West Coast at present, which is home to one of the best wind resources in the world.

The results of Ireland's first offshore wind auction (ORESS 1) in 2023 represented a major milestone for renewable energy. Corio is delighted to have been one of the four successful Phase 1 projects, with Sceirde Rocks being awarded 450 MW of the 3.1 GW of capacity awarded in ORESS 1.

This project will be one of the largest ever infrastructure projects in the Connemara region. Once built, it will be the first commercial-scale offshore windfarm on Europe's Atlantic margin, set on Connemara's Gaeltacht coast. Sceirde Rocks Windfarm is set to generate enough clean electricity to power more than 350,000 homes. The project will help Ireland to achieve its goal of generating 80% of its electricity through renewable sources by 2030. Once operational, the project will generate enough renewable electricity to avoid an estimated 550,000 tonnes of CO_2, which is the equivalent to taking 180,000 petrol cars off the road. In terms of additional benefits, a multi-million-euro Community Benefit Fund will be available over a 20-year period to support a range of sustainable community initiatives locally, with €3.5 million to be invested annually once the windfarm is operational.

South Coast DMAP Finalisation

Ongoing Government engagement with key stakeholders, including industry, throughout the finalisation of the South Coast DMAP (SC-DMAP) is key, including consideration of the solutions being put forward by industry, to ensure Ireland can successfully deliver on its ambitions and targets

for offshore wind, at the best value possible to both residential and industrial consumers. Clear, consistent timely communication and engagement with developers is essential, to ensure delivery of DECC's Phase 2 and Future Framework for Offshore Wind, including its first DMAP and the subsequent DMAP roadmap. Consistent co-ordination, alignment and engagement with other state agencies such as EirGrid and MARA will be critical to ensure industry and private capital can deliver on the State's 37 GW roadmap by 2050.

Through the Sceirde Rocks project and, more broadly, Corio's extensive offshore wind activities and portfolio globally, we have relevant experience across all stages of ORE development and delivery. This includes project scoping (e.g., initial surveys in collaboration with the local fishing community), site selection and optimisation, and successful MAC and ORESS bid applications. We have leveraged these experiences and knowledge, in responding to this consultation. We hope that the points raised in this response are considered in progressing the finalisation of the SC-DMAP, and subsequent DMAPs to follow.

The following section presents Corio's **Key Messages**, followed by our responses to the specific consultation questions posed, in the context of the Draft SC-DMAP and the wider DMAP process.

Our response broadly aligns with that of WEI, noting that in the Key Messages Section and our response to **Question 1**, we provide **company specific views on optimising ORE opportunities within the SC-DMAP and to this end, advocate for the inclusion of an additional "Area E" in the SC-DMAP**, as detailed in turn.

Key Messages

We strongly advocate for the optimisation of renewable energy production from within the SC-DMAP. Commercial and technical deliverability before the mid-2030s, in addition to CapEx/ OpEx implications, must play **key roles in influencing site selection on Ireland's south coast**.

Inclusion of "Potential Area E"

- We firmly believe that an additional "Area E" (as indicated in **Map 1** included in response to **Question 1**) which is to the West of the SC-DMAP **within the Low Environmental Constraint area** should be included in the Final SC-DMAP. As outlined in detail in response to **Question 1**, this "Area E" is proposed due to its relative: 1) low LCOE; 2) high deliverability potential; 3) high electrical efficiency; and, 4) proximity to industrial demand centres in comparison to the Maritime Areas currently identified, coupled with its similar distance from shore to Area A.
    - **Relative LCOE and Delivery Timelines:** Areas A-D are **not located in the areas with the lowest LCOE and are likely to require significant support schemes to ensure their realisation and delivery**. "Potential Area E" not only has a lower LCOE, but is also likely to be deliverable ahead of Areas B-D, which WEI have indicated are *"technically challenging and not currently feasible for development, with projects not expected until the mid-2030s".*
    - **Wave heights**, as illustrated in **Map 3** have a significant impact on project costs and site accessibility, and are considerably higher in Areas B-D versus "Potential Area E".
    - **Electrical Efficiency:** "Potential Area E" also has much shorter relative export cable lengths and would result in lower electrical losses and delivery costs.
    - **Proximity to Demand:** "Area E" would be significantly closer to the Cork region, which has **significant power demand onshore for both residential and industrial customers who require the lowest cost indigenous green energy to be produced**.

    - **Distance from Shore:** “Area E” is a similar distance from shore as Area A, and therefore should not be ruled-out this basis.
    - **Seabed condition:** Parts of “Area E” are excluded for technical reasons for exposed rock seabed. The areas excluded for surface rock are excluded for technical reasons but we have a very good understanding that there should be no technical impediment to development in such areas (and many other areas may have similar issues with subsurface rock with shallow sediment cover). We have demonstrated at Sceirde Rocks that shallow sediment and exposed rock are not an impediment to project delivery and there is an effective foundation solution for this type of seabed.
- There are clear benefits to prioritising offshore wind development within this low LCOE “Area E”, given the decarbonisation targets Ireland needs to urgently achieve.
- **The inclusion of Area E (possibly in lieu of Area D), in the SC-DMAP would afford MARA the opportunity to make available a less constrained amount of seabed, which is still in a low environmental constrained area (as per Map 1), while also ensuring commercial and competitive tension amongst developers remains in place in awarding development rights.** Having multiple initial future framework sites (i.e., B-E) for developers to present propositions on would ensure that a steady volume of successive projects could be delivered over the next 15 years. **It is imperative that Ireland’s growing decarbonisation targets aligns with the 10-year delivery period for offshore wind project from the point of initiation.**
- Ensuring an appropriate number of sites are made available for developers to bring forward would ensure that Ireland can compete competitively in the **global offshore wind market**. In this regard, it is worth reflecting on the **ScotWind process that concluded in 2022, where there were 74 developer applications that resulted in 17 Exclusivity awards, subsequently increased to 20 Exclusivity awards.**

We also seek clarifications concerning the following:

- The Draft SC-DMAP still makes reference to 800 MW onshore vs. 900 MW project offshore – **clarity is urgently required relating to the MEC for the Tonn Nua ORESS 2.1 project** and in advance of the ORESS 2.1 Auction taking place.
- **Grid & non-Grid Options:** *“The draft SC-DMAP identifies four Maritime Areas for proposed future deployments of both grid connected and non-grid connected ORE”.* Clarity is sought as to how this will be progressed, particularly in relation to anticipated project delivery timelines across the 4 areas. We note the role of MARA in this regard and that post ORESS 2.1, MACs will be awarded through a competitive process.
- **RePowerEU:** We seek clarity as to whether the SC-DMAP will factor in *“Renewable Acceleration Areas (formally go-to-areas)”* in alignment with RED III in the future; we consider not doing so to be a missed opportunity.
- **Wake Effects:** In this Plan Led approach, the Government should clarify what the approach is to deal with wake effects from the Project in Area A (and/ or “Area E”) from subsequent developments within Maritime Areas B-D and how or where in the process this will be dealt with. Not defining or providing clarity on this at this stage adds both uncertainty and delivery risk to potential projects. Having a working expectation that this is a matter that should be commercially resolved between relevant developers should not be assumed. In their role as lessor, it would be more practical for an appropriate state authority to develop any compensatory framework to deal with this matter.

Responses to Consultation Questions

Question 1: Do you agree with the 4 maritime areas identified for future offshore wind development in the draft SC-DMAP? If not, why?

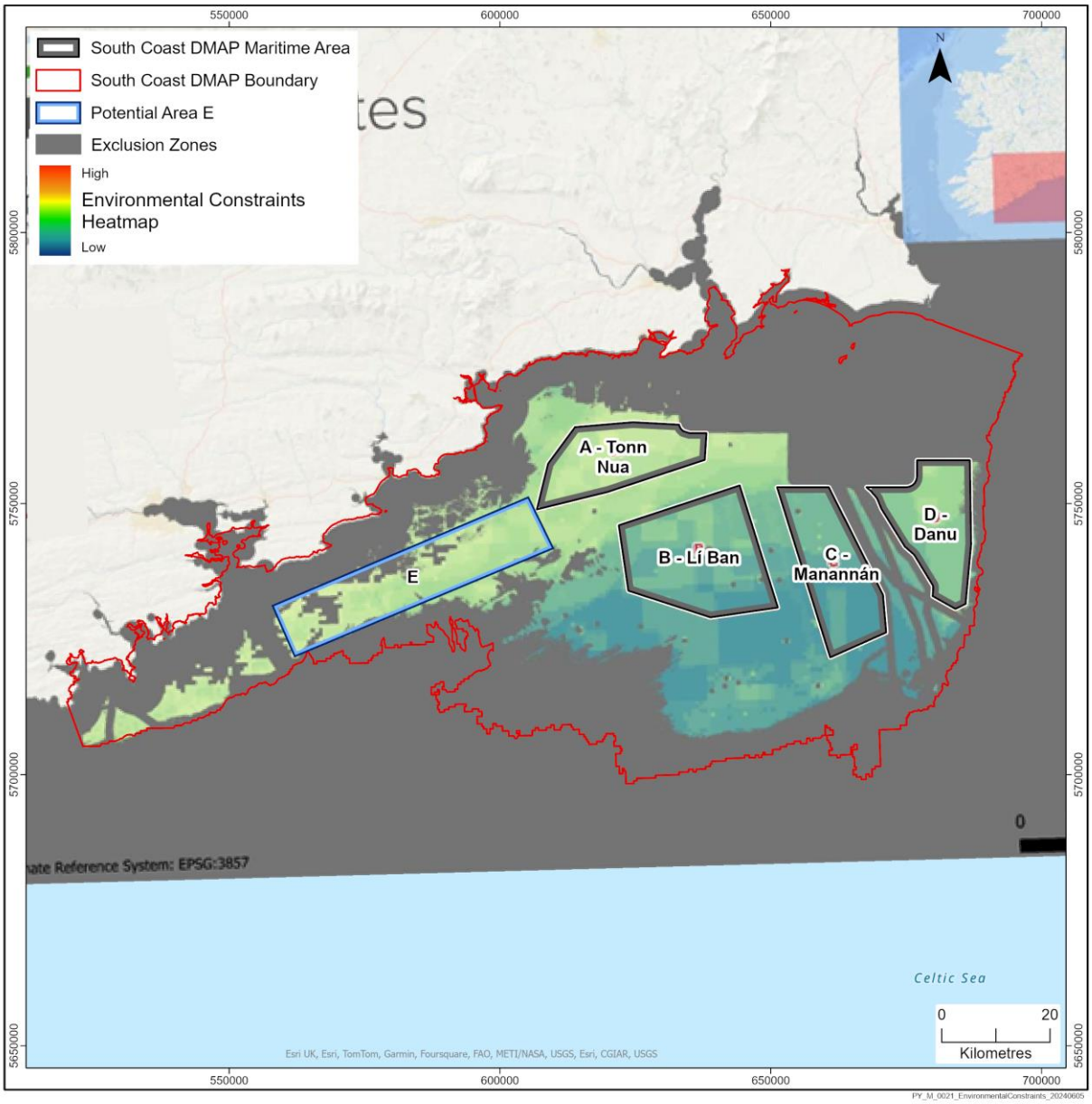
We wish to raise the following points in relation to the identification of Maritime Areas for future offshore wind development within the SC-DMAP.

1.1 Optimising ORE Opportunities – Inclusion of a 5th "Potential Area E"

We strongly advocate for the optimisation of renewable energy production from within the SC-DMAP, in alignment with the Government's long-term decarbonisation ambitions outlined in the Climate Action Plan 2024.

Commercial and technical deliverability before the mid-2030s and price implications must play a **key role in influencing site selection; there does not appear to be clear grounds for not selecting a further site west of Area A based on the constraints mapping provided, with further potential if technical exclusion for presence of surface bedrock is relaxed. Proposed "Area E" is a viable sea area which is realistic, reasonable, viable and implementable within the SC-DMAP, which can technically and commercially deliver on Ireland's decarbonisation ambitions** within Ireland's Carbon Budget 3 (2031-2035).

We firmly believe that "Potential Area E" (as indicated in **Map 1**) which is to the West of the SC-DMAP **within the Low Environmental Constraint area** should be included in the Final SC-DMAP. This "Area E" is proposed due to its relative: 1) low LCOE; 2) high deliverability potential; 3) high electrical efficiency; and, 4) proximity to industrial demand centres in comparison to the Maritime Areas currently identified, coupled with its similar distance from shore to Area A. Each of these considerations is discussed in turn.



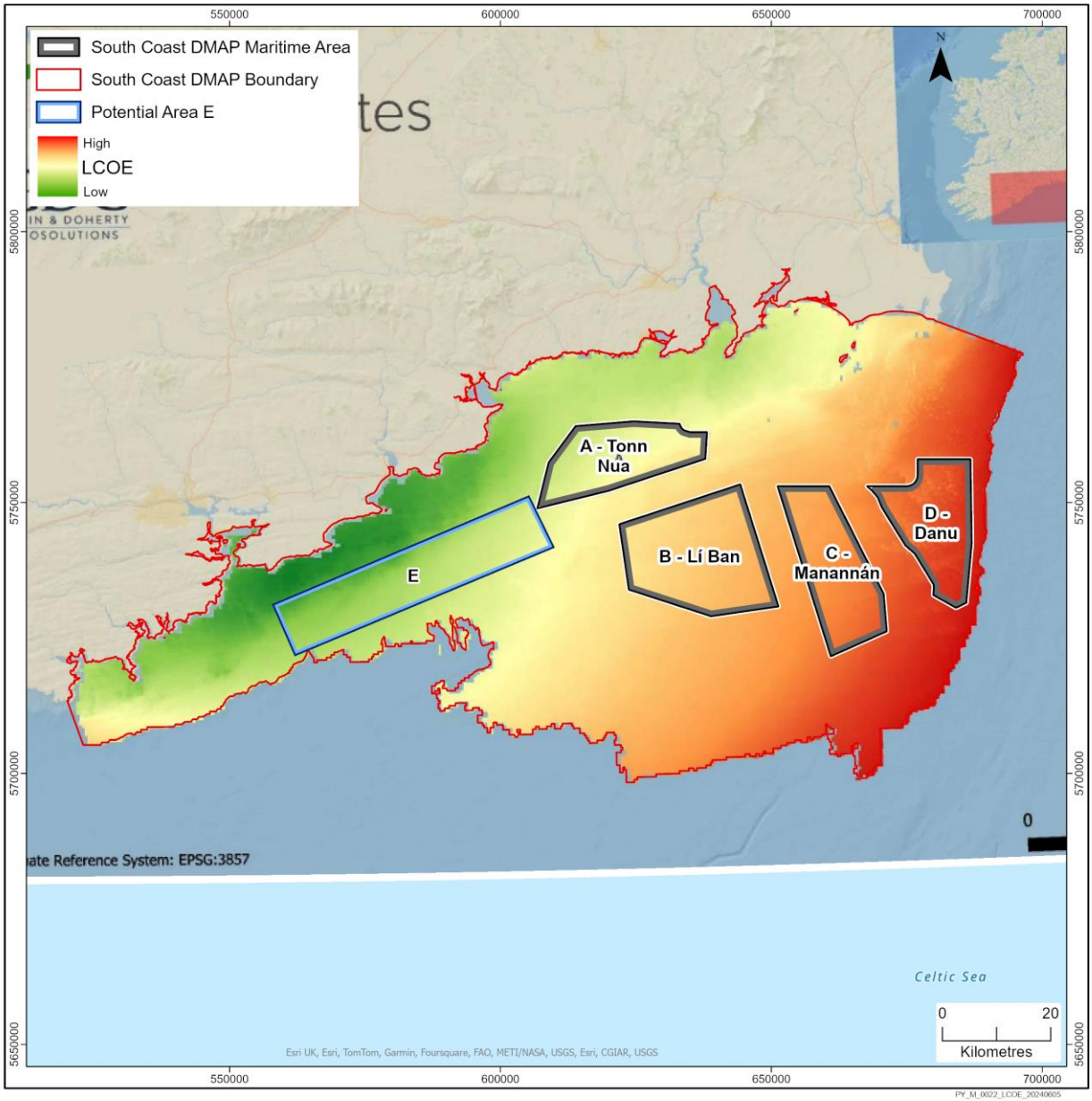
Map 1: Location for Maritime Areas, also showing exclusions and environmental consolidated constraint rating based on data presented in Maritime Areas Identification Report: Figure 0.2

1.1.1 Relative LCOE and Delivery Timelines

We welcome the indication in the Maritime Areas Identification Report that *"as well as identifying areas of low environmental and technical constraint, it is important to identify the more economically attractive locations for offshore wind installations".* The Report elaborates that "***it is important to highlight that both the proposed ORESS 2.1 Maritime Area, and the further Maritime Areas, are therefore <u>not located in the areas with the lowest LCOE</u>.*** *(…)* ***If only LCOE were to be considered, then the Maritime Areas would likely be much closer to shore, where the costs of project development are lower.****"*

As indicated in **Map 2**," Potential Area E" to the West of the SC-DMAP within the Low Environmental Constraint area would have a much lower LCOE than the Areas B, C and D, thereby resulting in better value to the end consumer.

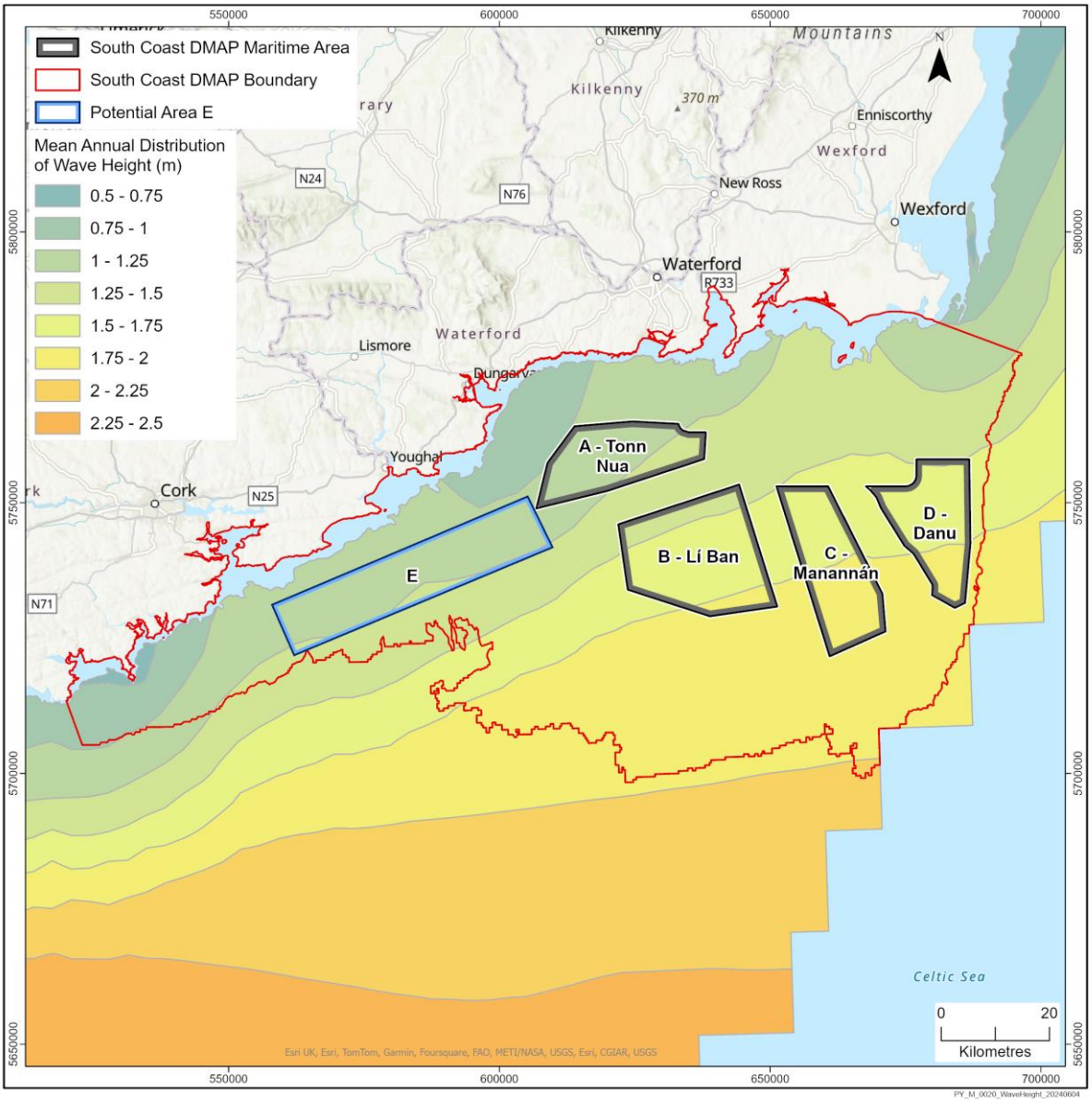
“Potential Area E” not only has a lower LCOE but is also likely to be deliverable ahead of Areas B-D, which WEI have indicated are *“technically challenging and not currently feasible for development, with projects not expected until the mid-2030s”* and are likely to require significant support schemes to ensure their realisation and delivery. WEI has elaborated that the logical outcome of this deliberate strategy to locate fixed-bottom ORE within deeper waters further from shore is that ORE deployment in Ireland will be more expensive, slower and riskier than it could otherwise be.



Map 2: Location of further Maritime Areas based on data presented in Maritime Areas Identification Report: Figure 2.11

1.1.2 Wave Heights

Map 3 illustrates the wave heights within the SC-DMAP, which have a significant impact on project costs and site accessibility, in turn impacting the LCOE, across the SC-DMAP. As you can see, the wave heights in Areas B-D are considerably higher than they are in “Potential Area E”. Locking out lower cost LCOE sites at such an early stage in establishing the offshore wind industry in Ireland will ensure the Irish State does not secure the lowest cost offshore renewable energy for Ireland.



Map 3: Wave Heights within SC-DMAP
Source: Mean Annual Distribution of Wave Height around Ireland - Dataset - data.gov.ie: *https://data.gov.ie/dataset/mean-annual-distribution-of-wave-height-around-ireland*

1.1.3 Electrical Efficiency

Within the SC-DMAP, it will be important to minimise electrical cable losses and delivery costs between the specific windfarms and relevant substations. As an illustration, a 1% increase in electrical loss on a 900MW windfarm could have an impact of c. €40-50 million over a project's lifetime and thus potentially have a bigger impact than the cost of a project's foundations. "Potential Area E" would also have much shorter export cable lengths as a project in this area would connect into the Cork Metropolitan area, compared to Areas B-D further along the south east coast.

1.1.4 Proximity to Demand

SC-DMAP site selection should ideally be close to **locations of greatest power demand onshore**. While still within the Low Environmental Constraint area identified, "Potential Area E" would be much closer in proximity to the **Cork region, which has significant power demand onshore**, and the

potential to become a cluster for hydrogen development from offshore wind, as outlined in the National Hydrogen Strategy.

On this point, the SC-DMAP Document outlines that *"there is a significant population and industrial base along the South Coast that is well placed to stimulate and benefit from the secure and cost-effective long-term supply of green energy that will be provided by implementation of the SC-DMAP once established. This proximity will further provide for alternative off-take solutions for potential non-grid connected offshore wind projects, including but not limited to the production of green hydrogen and other green fuels, as well private wires directly connected to large energy users."*

1.1.5 Distance from Shore

Area A (Tonn Nua) is 12.2-12.4 km from shore, which as DECC have indicated, at their SC-DMAP Public Engagement Sessions, is consistent with distance at EU level, bearing in mind commercial and technical viability of water depths. Therefore, **"Potential Area E" which is a similar distance and water depth as Area A should be included, particularly in light of the urgent need to deliver offshore wind targets for Ireland in the medium term and to ensure offshore wind project viability and delivery remains achievable for Ireland in the medium term.**

In summary, there are **clear benefits to prioritising offshore wind development within this low LCOE "Potential Area E"**. This area should most certainly not be sterilised from future development, given the challenging decarbonisation targets Ireland needs to urgently achieve. **The inclusion of a 5th site, Area E, in the SC-DMAP would afford MARA the opportunity to make available a less constrained amount of seabed which is still in a low environmental constraints area (as per Map 1), while also ensuring commercial and competitive tension amongst developers remains in place in awarding development rights.** It would also provide a suitable hedge to the State for any potential project realisation failures, delays or unforeseen issues that may arise.

As all the SC-DMAP areas will be refined through the development process to determine the final offshore wind project layouts, it can be expected that significant areas, including the development areas will remain available for fishing activity and other marine users.

1.1.6 Seabed Condition

Parts of "Area E" are excluded for technical reasons for exposed rock seabed. The areas excluded for Surface rock are excluded for technical reasons, but we have a very good understanding that there should be no technical impediment to development in such areas (and many other areas may have similar issues with subsurface rock with shallow sediment cover). Indeed, we have demonstrated at Sceirde Rocks that shallow sediment and exposed rock are not an impediment to project delivery and there is an effective foundation solution for this type of seabed.

1.2 Specific Clarifications Sought on Draft SC-DMAP

- The Draft SC-DMAP still makes reference to 800 MW onshore vs. 900 MW project offshore – clarity is urgently required relating to the MEC for the Tonn Nua ORESS 2.1 project and in advance of the ORESS 2.1 Auction taking place.
- **Grid & non-Grid Options:** *"The draft SC-DMAP identifies four Maritime Areas for proposed future deployments of both grid connected and non-grid connected ORE".* Clarity is sought as to how this will be progressed, particularly in context of anticipated project delivery timelines

across the 4 areas. We note the role of MARA in this regard and that post ORESS 2.1, awards will be made through a competitive process.

- **RePowerEU:** We seek clarity as to whether the SC-DMAP will factor in *"Renewable Acceleration Areas (formally go-to-areas)"* in alignment with RED III in the future; we consider not doing so to be a missed opportunity.
- **Wake Effects:** In this Plan Led approach, the Government should clarify what the approach is to deal with wake effects from the Project in Area A from subsequent developments within Maritime Areas B, C and D and how or where in the process this will be dealt with. Not defining or providing clarity on this at this stage adds both uncertainty and delivery risk to potential projects. Having a working expectation that this is a matter that should be commercially resolved between relevant developers should not be assumed. In their role as lessor, it would be more practical for an appropriate state authority to develop any compensatory framework to deal with this matter.

1.3 Support for Specific WEI Feedback

In terms of additional feedback, we align with the following concerns raised by WEI in their detailed response relating to the following:

- We support the WEI view that it was disappointing that the ORE sector was not included in the scoping phase of the SC-DMAP Strategic Environmental Assessment (SEA), and industry's concerns over a lack of transparency in the application of the methodology, as neither the topic-specific criteria used to assign constraint ratings 1-5 nor the resulting individual or consolidated constraint scores have been published.
    - **This means that it is not currently possible to confirm why specific areas of seabed have been excluded from consideration in the identification of maritime areas for ORE.**

Question 2: Do you agree that the draft SC-DMAP policy objectives and governance approach, including for environmental protection, will support and guide its sustainable and coherent implementation?

We agree that the Draft SC-DMAP will provide for the sustainable development of offshore wind through consideration of environmental protection, while maintaining, and where possible, enhancing marine biodiversity. As this is a plan-led process, it will be imperative that there is ongoing involvement/ regulation provided for by the State to ensure the objectives of the DMAP are clearly defined, as outlined in further detail in WEI's Response. In addition, how the objectives of the SC-DMAP are to be understood by the consenting authority when considering a consent application must be transparent and coherent, in order to avoid misinterpretation or assumptions being made in relation to any of the objectives set out in the plan.

We welcome the indication that a governance structure will oversee and monitor the implementation of the SC-DMAP including environmental impacts. That said, timelines need to be clarified for the establishment of the governance structure and work programme. **We support WEI's proposal that Terms of Reference are flexible to include development of all potential areas within the SC-DMAP.**

Flexibility is required with respect to regional level assessments to take account of national climate targets and policy delivery (e.g. CAP Actions and RED III).

It is positive to hear that policy objectives set out in the Draft SC-DMAP will inform future decisions and assessments by relevant competent authorities on proposed ORE projects and their enabling infrastructure. **Competitive processes for awarding sites within the Maritime Areas need to be considered, including what these might look like (MAC/ ORESS) and timing/ sequencing of same.**

One specific point relating to Area A is the indication that *"to ensure that statutory reviews of the SC-DMAP and projects brought forward under this Plan must consider the evolution of baseline conditions, which includes additional future national protected sites, e.g., Marine Protected Areas (MPAs) and European Sites, e.g., marine SPAs and SACs and data from regional level survey activity and projects."* We concur with the WEI view that this specific point cannot be applied to Area A, as it would create too much uncertainty to the project development process following on from auction bidding. Clarity is required as to whether this objective would specifically relate to only to the other Maritime Areas.

It is not clear from the Draft SC- DMAP what the competitive processes for Areas B, C and D will be. We understand that a MAC will be required by a developer to progress a site planning application for these sites and the nature of these awards will be decided by the Maritime Area Regulatory Authority. We understand that this a *"competitive MAC award' process, pursuant to Sections 93 and 103 of the MAP Act on either a phased or non-phased basis".* Ideally, we would like to understand how and when this process will be decided.

We are aware that via the published Future Framework that the following actions will be progressed:

- Action 10: Explore the feasibility of implementing a competitive MAC framework with consideration to requirements under the MAP Act including appropriate criteria and indicative timelines for implementation.
- Action 12: Design and develop a successor support scheme to ORESS, and obtain State Aid clearance, to be in operation from 2026-2030. This successor support scheme will be subject to domestic and international demand assessment.

Therefore, clarity on how these actions and governance processes are expected to be accommodated in the SC DMAP should be clearly outline in the draft plan.

Data Repository

The draft SC-DMAP states that "*MAC and development permission holders for Maritime Areas A, B, C and D are required to share data that has been obtained pursuant to a licence or authorisation granted by the State, or referred to or relied upon in a development application (where possible having regard to third party copyright and other legal restrictions), for the GIS data repository*." **Large parts of this data will be commercial sensitive to the project and therefore a clear timeframe needs to be applied to the public release of this data, particularly in the context of the ORESS 2.1 Tonn Nua development area.** Any data collected to prepare a planning consent application for the windfarm array and associated infrastructure cannot be made available to the public until at least a planning permission decision (and subsequent JR period) has passed. The same approach should be applied to the availability of survey data collected in advance of the construction of the project – i.e., not to be made this available until 12 months after COD.

As the SC-DMAP progresses, ongoing clarity from DECC on specific decisions being made in relation to the SC-DMAP, associated data and site selection is key.

Question 3: Do you agree that the draft SC-DMAP includes sufficient provisions for co-existence between ORE and other maritime activities?

In alignment with WEI, we fully support the Draft SC-DMAPs promotion of co-existence between ORE and other marine activities and fully appreciate that successful co-existence is key to a sustainable ORE industry in Ireland. **Please see WEI's response for industry's collective observations on co-existence.**

In terms of the specific points WEI raise, we wish to reiterate the following:

- SF 3 of the draft Plan states that:

  "*A Fisheries Management and Mitigation Strategy (FMMS) shall be prepared by developers of proposed ORE projects and transmission infrastructure, in consultation with identified local fishing interests.* ***All efforts should be made to agree the FMMS with those interests.*** *Those interests must also undertake to engage with developers and provide spatial information in a timely manner to enable completion of the FMMS. The FMMS should identify management and mitigation measures for each commercial fishery that can establish within a reasonable timeframe to developers of prospective offshore wind projects and transmission infrastructure, through the provision of spatial information, that they would be adversely affected by the development. The FMMS will be updated and amended by developers throughout the lifetime of a project as appropriate and as necessary."*

  This proposal, allocates the "burden of co-existence" onto the developer of the project. In the current setting on a plan-led approach that has pre-determined the development areas, this is not an appropriate or an acceptable approach. If co-existence is to be fostered in a plan-led system, the sponsor (DECC) or its appointees, must regulate this space and mediate to achieve a solution where necessary. We support the WEI recommendation that DECC should describe this process for regulation in the Final SC-DMAP.
- **Furthermore, we agree that interested developers in ORESS 2.1 will need to understand all their costs when bidding into the auction, including possible mitigation payments for affected fishermen / marine users of Tonn Nua (or any other co-existence provisions that have a monetary value).** It is incumbent on DECC, in this plan-led scenario, to provide guidance on the level of mitigation payments that can be levied where a *"...FMMS shall be prepared by developers..."*
- The Maritime Area Identification Report also states that some rerouting of traffic may be possible following detailed site-specific assessments. In this plan-led model, it is imperative that the agencies with responsibility for navigational safety fully understand and agree on the mitigation measures that are required to ensure that there are no insurmountable constraints / challenges at the project level. This approach should be applied to all areas where State agencies have responsibilities.

Question 4: Do you agree that the plan-led framework set out in the draft SC-DMAP will effectively support and drive economic and employment opportunities, including opportunities along the south coast?

We concur with the objective of maximising benefits for all within the SC-DMAP. To this end, we welcome the indications from BVG in their analysis of the SC-DMAP Regional Impact Assessment that it will deliver an estimated €4.4 billion in GVA benefits and an estimated 49,000 full-time equivalent (FTE) years of employment to the Irish economy.

We further welcome this analysis highlighting that the majority of these benefits will be captured at regional and local level along the south coast. Of these benefits, €2.9 billion and 32,200 FTE years is expected to be captured by the South Coast region in the baseline scenario, and €3.1 billion GVA and 34,300 FTE years in the manufacturing upside scenario. This means that the South Coast region captures between 66% and 70% of the total Irish GVA and employment benefits associated with the SC-DMAP.

Based on these projections, the development of Offshore Wind within the SC-DMAP will deliver significant positive local, economic social and decarbonisation benefits, which will bring national benefits, in turn. The benefits will extend during the offshore wind projects' **development, construction and operational phases, including economic development and job opportunities.**

Similar to the Phase 1 Projects, a multi-million-euro **Community Benefit Fund** will be available over the ORESS Tonn Nua period to support a range of sustainable community initiatives in the region, with millions of euros to be invested annually once the windfarm is operational. To place this in context, the Community Benefit Fund for the 450 MW Sceirde Rocks Project will provide an estimated €70 million worth of funding to local Connemara communities during the first 20 years of the windfarm's operation. The ORESS Tonn Nua Project will be twice the size of this Project, bringing even greater funding and support to the local region.

Despite these benefits and as we have previously flagged in response to **Question 1**, in alignment with the view of WEI we wish to reiterate that the Maritime Areas Identification Report acknowledges that Maritime Area A is not located in the area with the lowest LCOE and has been pushed further offshore. Similarly, areas B-D are technically challenging and not currently feasible for development, with projects not expected until the mid-2030s. **As WEI have also stressed, *"the logical outcome of this deliberate strategy to locate fixed-bottom ORE within deeper waters further from shore is that ORE deployment in Ireland will be more expensive and slower than it could otherwise be".*** For these reasons, we firmly believe that "Potential Area E" (as indicated in Map 1 included in response to Question 1) to the West of the SC-DMAP within the Low Environmental Constraint area should be included in the Final SC-DMAP as this will ensure the swiftest realisation of the potential of the SC-DMAP which will otherwise be delayed through reliance on areas B, C and D. As previously detailed in response to **Question 1**, this "Area E" is proposed given its relative: 1) low LCOE; 2) deliverability; 3) electrical efficiency; and, 4) proximity to demand in comparison to the Maritime Areas currently identified, coupled with its similar distance from shore to Area A.

We wish to thank DECC for the opportunity to comment on the Draft SC-DMAP and are available to discuss our feedback, at any stage. We look forward to the finalisation of the SC-DMAP.