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Elver Wind Park Limited

EDF renewables

Fred. Olsen Seawind

Ref: EWP-EWP-COR-01-LET-0002

14 June 2024

International and Offshore Energy Division
South Coast DMAP Submission
Department of Environment, Climate and Communications
29-31 Adelaide Rd
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Dear International and Offshore Energy Division Team,

Elver Wind Park Limited response to DRAFT South Coast DMAP Questionnaire

EDF Renewables (EDFR) and Fred. Olsen Seawind (FOS) are currently developing Codling Wind Park (CWP), a 50:50 joint venture (JV) and Ireland's largest Phase 1 offshore wind project. EDFR & FOS are seeking to further invest in the Irish offshore wind sector, leveraging their experience gained through CWP along with their UK and EU experience, via a new 50:50 JV known as Elver Wind Park Limited (EWPL/Elver). Elver is currently exploring participation into Ireland's next offshore wind energy auction, ORESS 2.1.

The JV partners EDFR and FOS, are two leading developers, owners and operators of renewable energy assets, with extensive global experience in the renewable energy and offshore wind sector.

In addition to CWP, EDFR's Irish pipeline includes an onshore development pipeline of almost 1GW along with 50% ownership in Emerald and Western Star, two proposed floating offshore wind developments which aim to be part of Ireland's offshore wind Future Framework. In addition, EDFR has constructed and energised three of the first utility-scale solar farms in Ireland in Wexford and Kilkenny and has announced five new onshore wind projects in the past two years. Alongside the Irish portfolio, in the UK EDFR has 36 onshore wind farms operating across Scotland, England and Wales, and two operational offshore windfarms in England, Teesside and Blyth. There is an additional 2.5GW+ of projects in the development pipeline, including Neart na Gaoithe, a 450MW offshore windfarm in Scotland that is currently under construction, and Gwynt Glas, a 1.5GW Celtic Sea floating offshore wind development with which is planned to participate in UK leasing Round 5. EDFR is also primary shareholders of four offshore wind projects in France, totalling 2GW in various stages of development.

FOS is an established, dedicated global offshore wind developer, with a development portfolio of over 2GW and builds on Fred. Olsen Renewables' 25 years of wind development experience and expertise. FOS is one of the Fred. Olsen related companies, which include Wind Carrier, Global Wind Services, 1848 and New Power Partners. These companies represent over 2,000 employees dedicated to delivering offshore wind projects globally and give FOS a large pool of experienced experts to draw on when developing sites and understanding the market. In addition to CWP, FOS is the 50% shareholder of the 1GW floating ScotWind site, Muir Mhòr Offshore Wind Farm, which is intended to be operational by 2030, making a significant

contribution towards the UK's 5GW floating offshore wind targets. FOS has a unique position to deliver significant economic, societal, and environmental benefits, because we work with Fred. Olsen-related companies that are already global leaders in services and supply chain expertise in the offshore wind energy sector.

Elver recognises that DRAFT South Coast DMAP is the transition to the plan-led model, so stress that holding an auction on Tonn Nua without the standard suite of data should be the exception not the rule for the future auctions/phases. In conclusion, we would like to thank DECC for the opportunity to engage on this matter. Should you wish to discuss any of the issues raised in our response or have any queries, please contact either ourselves or the EWPL project management team - Gemma Tait (Offshore Project Development Manager) at gemma.tait@edf-re.uk, or Liam Leahy (Director – New Business) at liam.leahy@fredolsen.com.

We confirm that this letter may be published on the DECC website.

Yours sincerely,

[redacted]

Elver Wind Park Limited Director

EDF Renewables Director, Offshore and Ireland

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Elver Wind Park Limited Director

Fred. Olsen Seawind Chief Financial Officer

[redacted]

EDF Renewables Head of Development and Delivery

Offshore & Ireland

DRAFT South Coast DMAP Questionnaire

1. **Identifying Maritime Areas for offshore wind development:**

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

Overall, Elver Wind Park Limited (50:50 joint venture [JV] between EDF Renewables and Fred. Olsen Seawind known as EWPL/Elver) agrees with the four maritime areas identified for future offshore wind development within the South Coast DMAP, and the process undertaken to select them. This response will primarily focus on the Tonn Nua site; however, the principles of site identification and site refinement is applicable to all the sites.

In previous consultation responses, the JV partners asked for the following to be considered within a heat mapping exercise:

- Ground conditions (the proposed foundation solution depends primarily on the type, thickness and complexity of soils and bedrock encountered)
- Water depth
- Grid capacity
- Metocean conditions (including wind resource, wave and current)
- Landfall constraints
- Potential export cable route
- Availability of essential infrastructure, such as ports, supply chain activity and storage locations
- Proximity to demand centres and industrial opportunities.
- Tow/transport time to site
- Environmental considerations (including future Marine Protected Areas (MPAs), Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)), visual impact/distance offshore.
- Hard constraints such as existing development, cables, wrecks, etc
- Socio-economic considerations such as commercial fishing and shipping
- Proximity to other ORE developments

These factors and constraints were mostly considered and shown in the South Coast DMAP: Maritime Area identification report which was circulated by DECC as part of the South Coast DMAP consultation.

Elver welcomes the area of 313km^2 allocated for the Tonn Nua site. In previous consultation responses the JV partners recommended a low site density of 2.5-3MW/km^2 to aid the site development process in the absence of additional site-specific surveys such as geophysical and geotechnical surveys. This has been taken on board with Tonn Nua having a site density of 2.88MW/km^2. However, it is still noted that the surveys are critical to further de-risk the Tonn Nua site.

There are areas of the analysis where Elver would like to highlight potential omissions: For example, when conducting a multicriteria analysis in GIS, it is essential to provide an extensive list of all the exact datasets used, along with their spatial and temporal resolutions. This is important for several critical reasons:

- **Transparency and Reproducibility:** Providing a detailed list of datasets ensures that the analysis is transparent. Others can see exactly what data was used, which is crucial for the reproducibility of the study. If other researchers or practitioners want to replicate the analysis or verify the results, they need to know the precise datasets and their characteristics.
- **Data Quality and Reliability:** The quality and reliability of the analysis depend significantly on the quality of the data used. By listing the datasets and their spatial and temporal resolutions, other users can assess the appropriateness and reliability of the data for the specific analysis. High-resolution data might be needed for detailed local studies, while coarser data might be sufficient for broader regional analyses. Without the exact datasets used there lacks transparency for analysis to be conducted in parallel to the studies. For example, the 9 datasets used for commercial fisheries are not listed.
- **Resolution Consistency and Compatibility:** Spatial and temporal resolution impacts the consistency and compatibility of different datasets. If datasets have different resolutions, it can lead to issues when overlaying or integrating them. Knowing the resolutions helps in understanding any potential misalignments or biases introduced by resolution discrepancies.
- **Documentation for Future Reference:** Detailed documentation of the datasets used, including their spatial and temporal resolutions, serves as a valuable reference for future studies. It helps in building a body of knowledge and ensures that subsequent analyses can build upon previous work without duplicating efforts unnecessarily.
- **Stakeholder Communication:** When communicating results to stakeholders, including policymakers, planners, and the public, it is important to convey the basis of the analysis clearly. Listing datasets and their resolutions helps in building trust and credibility, as stakeholders can see the foundation upon which decisions and recommendations are based.

In summary, providing a comprehensive list of datasets along with their spatial and temporal resolutions is fundamental for ensuring the transparency, reliability, accuracy, and credibility of a multicriteria analysis in GIS. It facilitates the proper interpretation of results, allows for reproducibility, ensures that the data is fit for the intended analytical purposes and in turn this facilitates a clearer initial assessment of risk for potential offshore areas by developers.

2. Sustainable development and environmental protection:

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?

Based on the principles of a plan-led approach, the draft SC-DMAP objectives and governance approach are likely to support and guide its sustainable and coherent implementation. Overall, Elver Wind Park Limited (50:50 joint venture [JV] between EDF Renewables and Fred. Olsen Seawind known as

EWPL/Elver) broadly agree with the policies identified and welcome them, specifically on the following key policy objectives:

- **Clarity and Direction:** Clear policy objectives provide a roadmap for all stakeholders, ensuring that development aligns with the targets set by the Irish government. During previous DMAP consultation workshops, DECC have stated that the DMAP process would be reviewed every 6 years. This would be a major concern to the development of a project, given that project would be in planning at this stage and would then be faced with a risk of changes to the DMAP process. Elver would strongly recommend that once a DMAP is set and an auction has been undertaken on the site, no further alteration or change can be made to the ORE DMAP process.
- **Environmental Protection:** Elver agree that environmental protection is essential and welcome that DECC has been working with NPWS to ensure environmentally sensitive areas are avoided. It is essential that the whole government approach to spatial planning is robustly considered to ensure the most suitable areas are chosen to maximise ORE potential whilst minimising environmental and socioeconomic impacts. These ORE sites must now be considered as areas for ORE in future spatial planning, such as MPA designation.

3. Promoting shared use of the sea:

Do you agree that the draft SC-DMAP includes sufficient provisions for co-existence between offshore renewable energy and other maritime activities?

Elver Wind Park Limited (50:50 joint venture [JV] between EDF Renewables and Fred. Olsen Seawind known as EWPL/Elver) welcome DECC including opportunities for co-existence and co-location and agree that this should be an integral part of ORE planning. Elver note there are good examples in other markets, such as Portugal, the Netherlands, Sweden, Finland and Belgium.

The JV recognise the difficulties of balancing all stakeholder views on the optimum ORE development location and would note that although expanding into deeper waters may alleviate some impacts (e.g., fishing and visual), this could impact project deliverability in terms of technical solutions available and increase the costs of the infrastructure will adopting novel solutions in deeper water. This demonstrates the importance of all technical, physical, environmental, and socio-economic constraints being considered during initial site selection (see responses to Questions 2 & 3, above). Co-existence between offshore renewable energy and other maritime activities must put safety first, ensuring that safety is considered at all points of the project life cycle.

We note the following examples of co-existence and co-location in other jurisdictions:

- Ørsted's research on lobster fishing within the Westernmost Rough Offshore Wind Farm off the NE coast of England, demonstrates that the local fishing industry can continue to thrive within the wind farm with no significant difference between catch rates pre- and post-construction.
- Equinor and Marine Scotland recently undertook a safe fishing trial at their Hywind site, (off east coast Scotland), which tested creels, fish traps and jigging lines and indicated that under the right

conditions and with the right information it is possible to safely deploy and recover these types of fishing gear within a floating offshore wind farm.

The ability to co-exist can be more challenging for mobile gears (e.g., trawls, dredges, and seines). However, fishing intensity data from EMODnet16 shows both static and mobile gear activity within numerous operating windfarms within the UK, such as Thanet. There is evidence of mobile gear fishing activity in UK offshore wind farms including, but not limited to Walneys, Hornsea, Beatrice and Moray East in addition to co-location, i.e., fishing within the same spatial footprint as ORE; programmes to expand other forms of sustainable fishing enhancements to allow for wider co-existence should also be considered. For example:

- The Netherlands National Water Programme 2022-2027 notes that "the space available for trawl fishing will continue to decrease because of the expansion of nature conservation areas and wind farms. In order to use the space on the North Sea efficiently and in doing so create alternative forms of food supply, the focus will shift to aquaculture and passive fishing, in areas such as wind farms."
- The Whitby Lobster Hatchery in UK which aims to protect Whitby's fishing heritage by conserving the local lobster populations.

The key to co-existence is proactive engagement with all stakeholders, notably here for fishing and ORE sectors. Furthermore, clarity is sought in relation to fishing co-location and compensation. As DECC have identified these sites and utilised fishing data to aid this selection, the onus for compensating fisheries should not fall solely onto the developer and this should be further investigated in the ORE-Seafood working groups alongside DECC to promote the most sustainable uses of our marine areas.

4. Maximising benefits for all:

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?

Elver Wind Park Limited (50:50 joint venture [JV] between EDF Renewables and Fred. Olsen Seawind known as EWPL/Elver) 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.

Elver believes a robust plan-led framework will create benefits to consumers:

- **Cost Savings:** Streamlined planning and reduced delays, subject to a realistic programme, lead to lower project costs, which can translate into lower energy prices for consumers. This will help avoid high auction strike prices which would not maximise the benefits to the consumers.
- **Energy Reliability:** Coordinated development pipeline ensures a stable and reliable supply of renewable energy.

113

- **Long-Term Price Stability:** Renewable energy sources can help stabilize energy prices over the long term by reducing exposure to volatile fossil fuel markets.

The plan-led framework will create benefits to the supply chain:

- **Predictable Demand:** A structured approach provides clearer timelines and clarity on a pipeline of projects, leading to a more consistent demand, enabling better planning and investment by suppliers in local infrastructure on the south coast and more widely in Ireland.
- **Economic Growth:** Increased and steady demand fosters job creation and growth in the local and national supply chain industries.
- **Innovation and Development:** Consistent projects and funding encourage technological innovation and advancements within the supply chain.
- **Investment Security:** Clear, long-term planning signals a stable market, attracting more investments and financing options for supply chain companies.

The plan-led framework will create benefits to the developers:

- **Regulatory Clarity:** Clear regulations, guidelines and expectations reduce uncertainties and simplify the consenting and permitting process. This should be underpinned by the location of the ORE site not being grounds for planning refusal and in principle the site is suitable for ORE development.
- **Risk Mitigation:** Early identification of potential risks enhances investor confidence and project stability. For example, again state led site selection should mitigate the risk of planning refusal.
- **Infrastructure Optimization:** Strategic site selection and integration with grid infrastructure optimize resource use and reduce development costs.
- **Streamlined Processes:** Coordinated efforts among stakeholders reduce administrative burdens and project delays.
- **Market Stability:** A plan-led approach offers a predictable and stable market environment, making it easier to secure funding and investment.