



Cavan: Clondargan, Stradone,
Co. Cavan, Ireland, H12 NV06
Cork: Unit 2 Airport East Business Park,
Farmers Cross, Kinsale Road, Cork, Ireland

t: +353 49 555 5050
e: info@galetechenergy.com
w: www.galetechgroup.com

International and Offshore Energy Division,
South Coast DMAP Proposal Submission,
Department of Environment, Climate and Communication (DECC),
29-31 Adelaide Road,
Dublin D02 X285

By email to: southcoastdmap@decc.gov.ie

14th June 2024

Subject: South coast designated maritime area plan (DMAP) for Offshore Renewable Energy (ORE)

Dear Sir/Madam,

Galetech Energy Developments (GED), part of the Galetech Group, would like to thank the Department of Environment, Climate and Communications for the opportunity to provide a submission on the *South Coast DMAP for ORE*.

Introduction

Founded in 2000, GED has been developing onshore wind, solar and storage projects over the past 23 years and we have entered the offshore wind space with keen interest to develop GW scale projects off the south coast of Ireland. GED is part of the wider Galetech Group involved in project development, management, and related services in the renewables sector. With over 130 employees, the group is Irish owned with its headquarters in Cavan and offices across our business divisions located in Ireland in Cork, Athy and Limerick and globally in Perth, Australia and Pretoria, South Africa. We have delivered 495MW of wind projects, we are developing a pipeline of 615MW, we own and operate 56.5MW of our own assets in Ireland in partnership with ESB and Greencoat Capital and we are also involved in a GW scale hydrogen project in Kenya. The environment and the communities in which we work are central to our values, ethos and development approach. While Ireland is our home and core market, we develop projects in other countries and provide services to other clients internationally. We both export our Irish based knowledge and bring back our experience from working with our global partners and clients. Further details available on our website www.galetechgroup.com.

As a member of Wind Energy Ireland, we broadly support WEI's submission along with some key points below, in reply to the DECCs four consultation questions, to emphasise from our perspective.

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

Yes, we agree with the four maritime areas identified, however, we do have a number of points we would like to make relating to the SC DMAP and the areas

identified for future offshore wind development.

Alternative routes to market

DECCs recently published Future Framework Policy Statement (FFPS) stated that “as Ireland continues to develop its ORE sector there will be increased opportunities for supporting the domestic green growth agenda and export market opportunities. For example, the co-location of large energy users with renewable generation, electricity interconnection with neighbouring states, and the export of renewable hydrogen and its derivatives”

In our response to the consultation on DECCs Future Framework Policy Statement (FFPS) earlier this year, we supported the statement in the FFPS that “the upcoming DECC Offshore Transmission Strategy will explore the potential to develop multipurpose interconnectors in Ireland” and we welcomed the statement under workstream 3 that there is a “credible case for export via pipe to the EU”. The question “whether to scale up domestic industry or export” was posed in section 3.2 of the FFPS.

Noting the above points from the FFPS, our view is that Ireland should develop a renewable hydrogen supply chain utilising Ireland's offshore renewable energy to generate renewable hydrogen in Ireland to maximise the use of that renewable energy domestically through creating a value product and export via pipeline to the EU/UK aligning with the European Hydrogen Backbone/Project Union vision, where there will be a huge European demand, which cannot be met alone by other EU member state's domestic ability to generate the renewable hydrogen volumes needed. Pipeline interconnectors can transfer multiples of the energy volume that cable electricity interconnectors can transfer. Given the geographic location of the SC DMAP in the Celtic Sea, any of the areas B, C and D would be suited to export pipeline to the UK or EU for example.

To align with the FFPS, it is important to keep all sites B, C and D within the SC DMAP open for alternative routes to market projects, for potential to export and for MARA to progress as expeditiously as possible, the formulation of an award framework for MACs for the first 2GW of non-grid limited capacity and subsequent projects “according to timing, methodology and processes to be determined by MARA in accordance with the MAP Act”. It does appear that policy objective MA2 of the consultation keeps options open for such alternative and export routes to market and we welcome this. With that, while our view is that options should be kept open for off grid and private wire power to X projects, including renewable hydrogen and options to export where feasible offtake solutions/markets are available, clarity around the exact meaning of the first 2GW non-grid limited capacity with alternative route to market would also be welcomed.

Floating wind

While we understand the logic of the SC DMAP being exclusively reserved for fixed offshore wind technology, we do think it is important for future DMAPs to follow as soon as possible to facilitate floating offshore wind in order for Ireland

to fully realise its offshore renewable energy potential.

Accounting for the capacity of the phase 1 and SC DMAP projects and along with an assumption of two further DMAPs in the north and south of the Irish sea (as previously indicated by DECC) along with presuming some level of attrition among all of those projects, Ireland will need of the order of 10GW of floating wind to meet its 2040 targets. Floating wind DMAPs with a capacity beyond 10GW, to allow for some attrition, are needed very quickly in order to realise 2040 targets.

In that regard, we welcome the commitment to establish two working groups to aid the accelerated emergence of floating offshore wind in Ireland in these future DMAPs.

Terrestrial/Maritime plans alignment

We note policy objective LS1 and the statement in relation to the alignment of maritime and terrestrial plans that “the facilitation of ORE development within the SC-DMAP area is aligned with the Regional Spatial and Economic Strategy for the Southern Region and City and County Development Plans for Local Authorities adjoining the SC-DMAP” and also in identifying suitable onshore areas for large energy users that “the Offshore Renewable Energy Task Force will give consideration for the requirement for a national energy park strategy to support this initiative.” We would request that industry is consulted and involved when consideration is being given to a national energy park strategy so that all aspects of development criteria can be shared, communicated and considered e.g. proximity to offshore wind farms, landing points for cables and pipelines, proximity to existing gas infrastructure with the potential for repurposing to hydrogen, etc.

Landfall points

We note it is proposed that Eirgrid are to carry out technical analysis regarding potential routes and landfall points “both in respect of proposed developments directly connected to the onshore transmission system and non-grid connected developments”.

We would submit that there is potential for conflict of interest with appointing Eirgrid to complete the analysis for non-grid connected developments. Such projects could connect to shore by private wire or hydrogen pipeline for example and depending on storage requirements, this could be via or subsequently returning to (from shore) a subsea hydrogen storage location.

Eirgrid is responsible for the offshore electricity transmission system only and not private wires or pipelines. Developers should be afforded the opportunity to select suitable routes/landing points or alternatively a different government agency should be appointed for the analysis relating to non-grid connected developments to avoid any potential for conflict of interest.

Further maritime areas within the SC DMAP and future DMAPs

Looking at the consolidated constraints map in the consultation, it would appear that the area to the south of maritime area B could potentially be utilised as an area for offshore wind development. Rather than risk delaying approval of the SC DMAP by considering inclusion of this area in the SC DMAP now, we would suggest DECC keeps this area under review for the future, particularly in the context of an additional maritime area that could potentially be used for an alternative export route to market.

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?

While ensuring that the deployment of ORE is the central focus of the SC-DMAP, it is essential that its implementation is undertaken in a manner which is consistent with the principles of sustainable development. In particular, the implementation of the SC-DMAP must be conducted in a manner which secures the environmental integrity of the DMAP area and does not undermine any environmental or ecological receptors.

Having examined the Policy Objectives for Maritime Areas, it is evident that the SC-DMAP seeks to ensure a balanced approach to the deployment of ORE while ensuring the protection of the maritime environment. In particular, we are supportive of Policy Objective MA1, which, explicitly, seeks to provide for the *"...strategically managed and sustainable development of fixed offshore wind technology...within the DMAP area."* Furthermore, Policy Objectives MA2, MA3 and MA4 set out a clear pathway for the development of ORE within the DMAP area thus providing a sustainable and coherent framework for the implementation of the SC-DMAP.

Additionally, the Policy Objectives for Mitigation provide a range of environmental safeguards to ensure that ORE deployment is only, and can only, be delivered at locations where it is appropriate to do so.

In relation to the policy objectives for overarching environmental protection (OEP), we would request that definitive language is used to be clear on what is required of projects e.g. in relation to water quality WQ1, marine litter ML1 and EMF under ML2, where it states projects "should" seek to meet certain standards. It is recommended that the language used be revised to be definitive so there is no ambiguity in how the objectives of the DMAP are to be understood by the consenting authority when considering a consent application. It is essential that the language used is unambiguous and coherent to avoid misinterpretation or assumptions being made in relation to any of the objectives set out in the plan.

With regards to the implementation and governance of the SC-DMAP; while we are broadly supportive of the governance structure being proposed, in addition to SC DMAP MAC holders, we would strongly recommend that representatives from the renewable energy industry are involved in the Technical Working Group. As the renewable energy industry will be active in the DMAP area, they will have relevant knowledge of the environment which can be used by the

Implementation Programme Board and Competent Authority to ensure the sustainable and coherent implementation of the SC-DMAP policy objectives.

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

Fishing and ORE Co-existence

The consultation document states that “it does not preclude other activities from taking place in the four maritime areas identified for ORE development; successful co-existence is a core objective of the draft Plan. However, no activity should take place within these areas that might be in direct conflict with ORE.”

While the ambition to have a principle of co-existence is a good objective in theory, in practice it is difficult to see how all types of fishing can continue in all circumstances within constructed wind farms without being “in direct conflict with ORE”. Wind turbines could be interconnected by way of cables or hydrogen pipelines or both for example. Each project will be different in terms of whether cables/pipelines can be buried or not or such cables/pipelines could become uncovered over time depending on seabed conditions and tide/current patterns for example in which case exposed cables/pipelines could be at risk of being damaged from fishing activities.

In this regard, it would be beneficial for DECC to formulate a framework for the ORE and fishing sectors. Such a framework would need to incorporate a ruleset around any co-existence including any activities that have a potential monetary cost, which needs to be known for seabed/lease auctions. We understand DECC are in the process of meeting the ORE and fisheries sectors separately initially via the Seafood ORE Working Group to formulate such a co-existence agreement/strategy. While we welcome this initiative, we understand this may only apply to preconstruction marine surveys and phase 1 projects only. We would suggest such a ruleset covers all phase of ORE development and applies to all DMAPs. It is also important that whatever agreement is reached is enforceable.

Other co-existence considerations

There are other issues for DECC to consider such as shipping lanes so that shipping traffic can pass safely through the SC DMAP and wind farms.

The possibility of safe ‘steaming’ routes through wind farms for fishing vessels could be considered by DECC (e.g. as part of the discussions between DECC/fisheries/ORE under point 3 above) to avoid transit times for fishing vessels from port/harbour to and from fishing grounds.

We note that a wake compensation framework does not seem to be considered currently in the consultation, which should be given consideration by DECC. A ruleset would be important for developers to understand in

advance of any seabed lease/support auctions.

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 agree that the development of ORE within the geographical area of the South Coast DMAP Proposal will deliver positive benefits.

The FFPS economic analysis recommended that Ireland should strive to exploit first mover advantage in relation to the renewable hydrogen market. The analysis also concluded that "while there is currently no commercial renewable hydrogen industry in Ireland Ireland will be globally competitive with growing industry elsewhere in Europe." The same analysis found that Ireland could use hydrogen domestically for ammonia, methanol or SAF but these would have to be large scale mega-plants to compete globally.

Given that Ireland currently has a minor hydrogen market and that large scale mega-plants for production of derivatives/products will be required to compete globally, Ireland's domestic market demand may not develop as quickly at other European countries and Ireland needs to take advantage of being first market mover to supply that demand regardless of whether that demand first establishes in Ireland or in other markets.

The export opportunity for green hydrogen and its derivatives may come before the domestic hydrogen market evolves. Ireland must take advantage of the opportunity wherever that demand first arises and so we would submit that the option for alternative routes to market including export markets should be left open for the maritime areas subsequent to ORESS2.1 Tonn Nua within the SC DMAP.

Conclusion

We would again like to thank DECC for the opportunity to provide a submission on the *South Coast DMAP Proposal* and we look forward to the publication of the DMAP after approval by the houses of the Oireachtas.

Yours Sincerely,

[Redacted signature]

Offshore Development Director
Galetech Energy Developments