

14th June 2024

Iberdrola Renewables Ireland
C/O ScottishPower Renewables
320 St Vincent Street
Glasgow, G2 5AB

SPRplanningpolicy@scottishpower.com

Dear Sir/Madam,

**RE: Draft Offshore Renewable Energy South Coast Designated Maritime Area Plan (DMAP)
Consultation – Iberdrola Renewables Ireland response**

We welcome the opportunity to respond to the above consultation.

Iberdrola Renewables Ireland is part of the Iberdrola Group; a global leader in tackling climate change with over 41GW of renewable capacity already in operation world-wide. We have a proud history of operating on the island of Ireland for over 25 years and now operate six onshore windfarms with a total capacity of around 60MW and have secured planning consent to re-power our Barnesmore windfarm in County Donegal, and Rigged Hill and Corkey windfarms in Northern Ireland. Iberdrola is also leading the way in the development of battery storage technology having recently completed the 50MW Gorman BESS in County Meath and is a market leader in the development of green hydrogen – an area we have pioneered, with over 60 projects in eight countries.

Iberdrola Renewables Ireland remains actively engaged in supporting the Irish Government on the essential journey towards decarbonisation of society at pace and will continue to consider how Iberdrola's global experience can be of benefit to the delivery of Offshore Renewable Energy (ORE) developments to meet Ireland's ambitious deployment targets. Building on our previous work chairing Wind Energy Ireland's Offshore Renewable Energy Development Plan 2 (OREDPII) Working Group, Iberdrola Renewables Ireland is pleased to have secured a developer representative place on the new joint Industry-Government ORE Future Framework Working Group. We look forward to working with partners to help co-ordinate the implementation of priority actions, including development of a DMAP Roadmap by Q4 2024 and the design of a competitive MAC process.

Iberdrola Renewables Ireland has contributed to and endorses the submission made by Wind Energy Ireland in respect of the Draft South Coast DMAP. Given the brief consultation period and even shorter window for the Government to review consultation responses, finalise the DMAP and submit all documentation to the Oireachtas to enable plan adoption before the summer recess, we have limited our own response to a relatively small number of pertinent issues. We would have wished to seek further changes to improve the quality of the DMAP, but this is simply not possible within the available timeframe.

In the context of Ireland seeking to achieve ambitious deployment targets, it is vital for the ORE South Coast DMAP to be adopted at pace to maintain positive political, public and supply chain momentum after a long period of uncertainty and to avoid any unnecessary delays to

the ORESS2.1 auction. However, this desire for speed must not come at the expense of compromising the quality and robustness of the DMAP, rushing through impacts assessments or failing to complete proper governance processes.

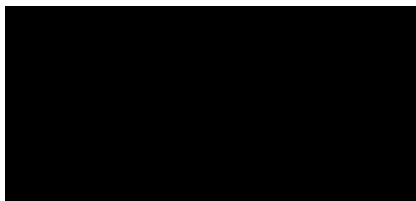
To safeguard the integrity of the DMAP and subsequent consenting of ORE projects, it will be essential for the Government to assure itself that the final DMAP and accompanying impact assessments are robust. We understand that processes are in place to address consultation feedback and that clarifications could be provided in final reporting where appropriate. In the event that further plan development or assessment, which may trigger re-consultation requirements, is deemed necessary and cannot be completed within the available window prior to the summer recess, the adoption of the DMAP must then be postponed to enable all necessary work to be completed.

Whilst we have set out our responses to the specific survey questions in the attached Annex, we wish to highlight the following key points:

- We broadly support the ORE area selection methodology adopted but are concerned over a lack of transparency in its application, as the scoring data assigned spatially to seabed areas has not been published. As such it is not possible to confirm why some areas have been excluded. This should be addressed through incorporating scored constraint layers within an updated online GIS viewer to accompany the final South Coast DMAP;
- Maritime Area A is not located in the area with the lowest LCOE, having been pushed further offshore, whilst areas B-D are technically challenging and may not be viable until the mid-2030's. The outcome of this strategy to locate fixed-bottom ORE within deeper waters further from shore is that deployment will be more expensive and slower than it could otherwise be; and,
- No rationale has been provided for the application of a 2km buffer around the Seas Off Wexford Special Protection Area whilst the Natura Impact Statement does not provide area-specific assessments of the potential for adverse effects on the qualifying features and integrity of relevant European Sites. As the adoption of the DMAP will afford statutory and policy support to ORE development within Areas A-D, further spatial assessment work is needed to safeguard the integrity and robustness of both the ORESS2.1 auction and future consenting processes.

Iberdrola Renewables Ireland welcomes the opportunity to respond to this consultation and trust our comments are helpful. We would be pleased to discuss any aspect of our response and would welcome further dialogue on the identified issues.

Yours faithfully,



Head of Planning & Environmental Policy & Aviation

ScottishPower Renewables on behalf of Iberdrola Renewables Ireland

Annex: Responses to Consultation Questions

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

Yes, Iberdrola Renewables Ireland broadly agrees with the four maritime areas identified for future offshore wind development. We are however disappointed that vast swathes of the DMAP area, including seabed in shallow areas which is recognised to have a low Levelised Cost of Energy (LCOE), appears to have been discounted without clear justification, as neither the area assessment criteria nor scorings have been published.

Area Selection Methodology

Iberdrola Renewables Ireland is pleased that DECC has listened to concerns outlined in our previous submissions and those of Wind Energy Ireland in respect of Draft Offshore Renewable Energy Development Plan 2 (ORED II) and the South Coast Designated Maritime Area Plan (DMAP) Proposal regarding the flaws of using reductionist approaches to identify areas for ORE development based on individual constraints and exclusions, rather than balancing constraints with opportunities and positively seeking to deploy offshore renewable energy in the most appropriate areas. We therefore broadly welcome the layered opportunities and consolidated constraints analysis methodology undertaken through GIS to identify maritime areas A-D, which we consider represents a balanced and logical approach. In overall terms we consider that the Maritime Areas Identification Report accompanying the Draft DMAP outlines a logical methodology to aggregate GIS data layers, derive a consolidated constraint layer and apply this alongside technical opportunities mapping.

Iberdrola Renewables Ireland is however disappointed that the ORE sector was not included in the scoping phase of the South Coast DMAP Strategic Environmental Assessment (SEA), where it now appears that the application of specific constraints was discussed with relevant bodies. We are also concerned over a lack of transparency in the application of the methodology, as the SC-DMAP Workbook 1 - Draft Environmental Data Log (hereafter 'the data workbook') containing the topic-specific criteria used to assign constraint ratings 1-5 spatially was not published until 7th June, merely seven days prior to the consultation deadline. This is despite Section 7.4.6.3 of the SEA Environmental Report published on 3rd May previously directing readers to this resource for further details.

Given the very short period between publication of the data workbook and the close of this consultation, we have not been able to review the scorings and associated justifications in detail. This is unfortunate as these scorings underpin the methodology for the selection of areas for ORE development. We would however observe that many of the justifications provided are brief and in some cases based on subjective judgements of acceptability. In light of these concerns, DECC must assure itself of the robustness of all assigned scorings and associated justifications prior to the adoption of the final South Coast DMAP.

Section 3.4 of the Draft South Coast DMAP outlines realistic development capacities for areas A-D, all based on 65% - 91% or 95% coverage ranges. However, the Maritime Areas Identification Report does not explain how areas A-D were sized and no sensitivity analysis or evidence is presented to explain why the proposed coverage ranges were selected or demonstrate that impacts associated with development up to the maximum coverage level would be acceptable. This should be addressed through the provision of coverage-area sensitivity analysis and further justification within an addendum to the Maritime Areas Identification Report.

Analysis and Scoring of Constraints

Iberdrola Renewables Ireland understands that the area selection methodology was underpinned by use of 1 - 5 scoring levels across environmental constraints, as outlined in Table 2.3 of the Maritime Area Identification Report, with technical constraints either scored on the same basis or using a binary approach (1/5) as appropriate. However, the "rating rationale" presented in Table 2.3 to justify each level of scoring is generic so does not readily translate to individual constraint layers and the actual scoring data applied spatially to areas or polygons through GIS constraints analysis has unfortunately not been published. We also note that the online GIS viewer for the draft DMAP (only published towards the end of the consultation period) does not include the scored constraints as layers. This makes it difficult to understand why some areas, especially within 5 - 15 km from shore, have been deemed subject to high levels of consolidated constraints and therefore discounted.

The environmental data layers figures provided in Appendix B of the Maritime Areas Identification Report provide a useful overview of consolidated constraints but again these do not provide any visibility of where individual constraints were assigned a rating of 5/5 such that areas were automatically excluded, irrespective of other factors. It is difficult to cross-match the scorings provided in the data workbook with the consolidated constraint maps included in the Maritime Areas Identification Report and is not possible to identify from the published materials how constraint scores have been applied spatially to each area or polygon within the GIS constraints map.

As a result of these weaknesses, it is not currently possible to confirm why some areas of seabed have been excluded from consideration in the identification of maritime areas for ORE. To address this lack of transparency, the scored constraint layers should be incorporated within an updated online GIS viewer which should accompany the final South Coast DMAP to provide transparency regarding how individual and consolidated scorings have been applied to specific areas.

We are also concerned that an overly conservative consolidated constraints threshold (any area of assigned above 40% of the total possible score) has been applied to exclude some areas without robust justification. This could set a negative precedent for future DMAPs for other ORE technologies or where less space may be available within a DMAP boundary. Given the very precautionary approach adopted for the South Coast DMAP, we consider that at least some of the discounted area is likely to be developable and could be suitable for other ORE technologies if individual constraints forming part of the consolidated constraint score can be satisfactorily mitigated, such that vast swathes of the DMAP area should not be formally "excluded" from further consideration.

Rather, we suggest that fully excluded areas should be limited to the top 25% consolidated constraint ratings or where individual constraints receive a rating of 5/5 and crucially where this is substantiated by evidence and justification (as above, this has not been provided for the South Coast DMAP). We suggest that areas scoring between 50-75% but without individual constraints rated at level 5 should be marked simply as either sub-optimal or not preferred for the purposes of this DMAP, as opposed to being “excluded”. Adopting this more pragmatic and evidence-based approach would avoid prejudicing the potential consideration of the same areas of seabed in future DMAPs. The Maritime Areas Identification Report should therefore be updated to refine the language used regarding areas which have been discounted in the identification of maritime areas for ORE.

Iberdrola Renewables Ireland welcomes the recommendations in Section 3 of the Maritime Areas Identification Report regarding the need to refine constraints analysis and structured processes for selecting areas within future DMAPs. As detailed above, this must include greater transparency in terms of acknowledging any buffer zones and publishing all constraint-specific criteria or distances which are applied to assign areas up to environmental constraint rating 5 (automatic exclusion).

Distance to Shore - Seascape & Landscape Impacts

There is some obfuscation as Figure B.15 within the Maritime Areas Identification Report appears to show that tiered distances from shore were used to assign seascape and landscape constraints, yet the use of specific distance from shore buffers is neither stated nor justified in the report. The data workbook published on 7th June indicates that a 0 - 5 km distance from shore has been assigned a constraint score of 5/5, thereby automatically excluding this coastal strip, with a constraint score of 4/5 assigned to all seabed lying 5 – 24 km from shore.

It is of significant concern that these arbitrary scorings in respect of potential landscape and seascape effects have been made without reference to any factors other than distance. Furthermore, it is flawed for the same constraint score (4/5) to have been uniformly applied across a wide 19 km range in distance (i.e. indicating the same level of constraint in areas located 5.1 km and 23.9 km from shore), especially when the constraint score of 5/5 was limited to a 5 km range. We also note that Section 8.3.2 of the SEA Environmental Report inappropriately conflates distance to shore ranges with potential landscape impacts and re-states flawed assumptions previously presented within the OREDP II SEA Scoping Report (2022).

As raised in Iberdrola Renewables Ireland’s previous response to the OREDP II SEA Scoping Report, no methodological information (e.g. assumptions regarding candidate turbine, height or other parameters to calculate theoretical visibility) have been presented to support a proper assessment of potential landscape or seascape impacts, which if they were to be experienced would be from specific locations and would take account of interactions with baseline topography, landscape characteristics and visual features. It is therefore of significant concern that the SEA Environmental Report repeats the mistake made previously in the OREDP II SEA Scoping Report of concluding that a “substantial level of impact” is likely to occur from turbines sited out to 15 km from shore, without any supporting technical evidence or justification being provided. This is not a reliable or robust method of assigning constraint scores to seabed.

Protection of European Sites

In respect of the protection of designated sites in the area selection process, section 6 of the Draft South Coast DMAP suggests that "*Natura designations were included in the area specific assessment carried out to identify the Maritime Areas*". However, the Maritime Areas Identification Report only briefly notes that a 2km buffer was applied around Seas off Wexford Special Protection Area (SPA) "*due to environmental sensitivity*", with no justification provided for the use of this specific distance.

It is therefore unclear why a 2km buffer is considered to be either necessary or sufficient as a form of mitigation and what influence this has on potential adverse effects from offshore wind development in Area A on the specific qualifying interests of the adjacent SPA. We would observe that these qualifying interests cover 20 ornithological species including Red-throated Diver (*Gavia stellata*), Lesser Black-backed Gull (*Larus fuscus*), Kittiwake (*Rissa tridactyla*) and Razorbill (*Alca torda*) amongst others. Given the immediate proximity of Area A – Tonn Nua to the Seas off Wexford SPA, to avoid generating consenting risks for the ORESS2.1 project, including potentially complex derogation and compensation requirements, these uncertainties need to be addressed through substantive updates to the Natura Impact Statement (NIS) prior to the finalisation of the Appropriate Assessment for and formal adoption of the South Coast DMAP.

The NIS does not elaborate on the 2km SPA buffer noted in the Maritime Areas Identification Report or include area-specific assessments of likely effects arising from ORE development in areas A-D on relevant European Sites. We also note that the data workbook that Special Protection Areas in Irish waters were only assigned a constraint score of 4/5, despite acknowledgement within the associated justification that the foraging ranges of relevant qualifying interest species extend well beyond the boundaries of SPAs themselves. In addition, the Appropriate Assessment presented in Section 6.4 of the NIS only considers potential effects from the suite of proposed high-level policy objectives and does not provide area-specific assessments of the potential for adverse effects from the designation of areas A-D for ORE development, either in relation to individual or cumulative effects on the qualifying features and integrity of relevant European Sites. This is somewhat surprising given that Table 2.1 of the NIS identifies the designation of specific maritime areas as being a substantive component of the DMAP.

We observe that the policy-based assessment provided in Section 6.4.1 of the NIS relies heavily on the need for individual projects to undertake future project-level assessments in order to conclude that the DMAP itself will have "no adverse effects on any European sites". This greatly reduces the value of the plan-level NIS, as it does not appear to:

- explain how the location and qualifying features of relevant European sites has informed the delineation of proposed areas A-D, either on an individual or cumulative basis; or,
- consider potential impact pathways between areas A-D and relevant European sites.

From our global experience of developing offshore wind, Iberdrola Renewables Ireland fully recognises the importance of undertaking a robust project-level Appropriate Assessment within future consenting processes for individual ORE projects. However, given that the adoption of the DMAP will itself afford statutory and policy support to ORE development within the identified areas, it is clearly sub-optimal for this plan-level Appropriate Assessment

to simply defer to future project-level work. This uncertainty effectively dilutes the policy support afforded by the DMAP to ORE development in areas A-D and means that future project consent applications would need to proceed at risk unless and until their associated project-level Appropriate Assessment is able to confirm the absence of adverse effects on relevant European Sites.

To address this weakness and enable the DMAP to provide confidence to both ORESS2.1 auction bidders and prospective developers of ORE within areas B-D, further assessment work and reporting must be undertaken prior to the adoption of the DMAP. This is imperative to safeguard the integrity and robustness of both the ORESS2.1 auction and of future consenting processes for ORE development in areas A-D. Specifically, further reporting is required to confirm that areas A-D are indeed suitable for ORE development in respect of any likely significant or potential adverse effects (including cumulative effects) on the integrity of relevant European Sites and their associated qualifying interests. We therefore consider that an updated NIS should accompany the final proposed DMAP when presented to the Oireachtas for formal adoption. This updated NIS should include area-specific assessments focusing on impact pathways to relevant qualifying features, details of the "*built-in*" mitigation measures referenced in Section 6.4.1 of the current NIS and a robust cumulative assessment taking account of other planned ORE developments in the Celtic Sea.

Cumulative Effects

We are concerned that insufficient attention has been afforded to the consideration of potential cumulative effects within the Draft DMAP and accompanying impact assessments, which could undermine the robustness of the plan and subsequent consenting processes. To the limited extent that cumulative or in-combination effects have been addressed, this appears to focus on interactions between areas B - D rather than also considering Area A – Tonn Nua.

Whilst logical in relation to sequential development within the DMAP area alone, this approach fails to account for potential cumulative impacts between development in Area A and other projects outwith the scope of the DMAP, including from offshore wind development through the UK Crown Estate's ongoing Round 5 - Celtic Sea leasing process. To safeguard plan robustness, we consider that the relevance and implications of the Crown Estate's Celtic Sea leasing round need to be more clearly addressed within the final DMAP and accompanying impact assessments, specifically including greater consideration of potential in-combination ornithological effects within the Appropriate Assessment Screening and Appropriate Assessment section of the Natura Impact Statement.

Implications for future floating wind

Iberdrola Renewables Ireland welcomes the recognition in Section 3.3 of the importance of floating offshore wind and the commitment to develop future DMAPs for the deployment of that technology. However, this text should be amended to clarify that this current DMAP but does not preclude potential areas for floating offshore wind from being identified within the same boundary through future DMAPs. To avoid setting a negative precedent for future DMAPs, wording in the second paragraph of Section 3.4 should similarly be tweaked to clarify that this DMAP only relates to and restricts fixed-bottom ORE developments, not all future ORE developments, to the four identified areas.

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?

Yes, Iberdrola Renewables Ireland broadly agrees with and supports the proposed policy objectives and governance approach outlined within the Draft South Coast DMAP.

Clear Policy Framework

Iberdrola Renewables Ireland strongly welcomes the provision of a comprehensive suite of policy objectives and requirements within the Draft DMAP which, read together with the National Marine Planning Framework (NMPF), should provide a clear and predictable consenting framework for future ORE projects in the South Coast region. We would however caution that policy objectives and requirements should in all cases be aligned with existing provisions within the NMPF and guidance from statutory consultees. This DMAP should avoid setting out additional or more onerous expectations for ORE in the South Coast region unless demonstrated to be required and proportionate to mitigate likely impacts.

We welcome the linkages made to other relevant plans and policies within the Draft DMAP and associated impact assessments. However, no reference is made to the Government's forthcoming Marine Planning Policy Statement, which is expected to outline the hierarchy of marine policies and set out strategic principles of marine planning policy which should be observed. This is inconsistent with the consideration of planned but not yet enacted Marine Protected Areas. To address this weakness, the relevance and implications of the Marine Planning Policy Statement for DMAPs overall and specifically for the South Coast DMAP should be addressed in the final version of the plan.

Governance and Impact Assessments

Iberdrola Renewables Ireland would defer to the submission made by Wind Energy Ireland in respect of governance matters but would highlight that we are pleased to have secured a developer representative place on the new joint Industry-Government ORE Future Framework Working Group. We look forward to working with partners to help co-ordinate the implementation of identified priority actions at pace, including the development of a future DMAP Roadmap and the completion of feasibility stage work to develop a competitive MAC process by Q4 2024.

In relation to statutory impact assessments, following from our previous call in response to the South Coast DMAP Proposal for a robust SEA Scoping exercise including stakeholder engagement to be undertaken prior to the selection of areas for ORE development, we are surprised to now learn that SEA Scoping took place in September 2023 without any public or industry involvement. We would also note that the SEA Scoping Report has still not been published online. This is disappointing and must be seen as a missed opportunity for early engagement of ORE developers within the SEA Scoping process which could usefully have informed deliberations regarding the protection of designated sites and co-existence with fisheries. More importantly, it would be provided a transparent opportunity to review proposed

criteria for scoring individual constraints against 1-5 ratings and to comment on the robustness of automatically excluding any areas receiving a rating level 5 against individual constraints.

We are also concerned that the approach adopted to identifying and assessing reasonable spatial alternatives in Table 7.3 of the SEA Environmental Report is flawed as it fails to recognise the potential for multiple reasonable alternative approaches to undertaking multi-criteria analysis (MCA), each of which could result in different areas being identified for ORE. It is insufficient only to identify undertaking MCA as a single potential reasonable alternative methodology for selecting ORE areas. Within the context of undertaking MCA, potential reasonable alternative methodologies which should have been considered include:

- Use of different topic-specific criteria and definitions to determine individual constraint ratings 1-5 (as noted earlier, the consolidated constraint scorings spreadsheet is referenced within the SEA Environmental Report but has not been published)
- A decision to automatically discount any area receiving a rating level 5, as opposed to only excluding areas based on consolidated constraint scores.
- Use of 40% of the maximum consolidated constraint score as the cut-off to automatically exclude areas, as opposed to setting the cut-off at a different (e.g. less conservative) level. Doing so would have retained areas with a lower Levelized Cost of Energy (LCOE) and could have resulted in less challenging areas being identified for ORE whilst still avoiding significant adverse environmental effects.

Policy Objectives

Owing to the brief consultation period and subsequent short review window prior to DMAP finalisation, Iberdrola Renewables Ireland would defer to the submission made by Wind Energy Ireland in respect reviewing in detail the proposed policy objectives and seeking changes to some of these. We would however highlight the following pertinent issues which should be addressed:

Maritime Areas Policy Objectives

- It is helpful for establishing the needs case of projects in areas A-D that Policy Objective MA1 notes that "*development of fixed offshore wind brought forward under this Plan is considered to be of strategic and national importance to the State*". However, policy objective MA1 should go further to provide more explicit policy backing and justification to support the application of Habitats Directive requirements in the consenting of projects within areas A-D.
- Policy Objective MA1 should also be amended to support the implementation of relevant provisions from the revised EU Renewable Energy Directive 2023/2413 and associated EU emergency regulations, which set out a presumption that proposed renewable energy projects will be of overriding public interest and serving public health and safety unless there is "clear evidence" of significant adverse effects which cannot be mitigated or compensated for. Policy Objective MA1 should therefore refer to this EU-wide position and incorporate a presumption of there being imperative reasons of over-riding public interest (IROPI) in favour of developing projects in areas A - D.

- Policy Objective MA2 inappropriately restricts, at least for the duration of this plan period, ORE development across “the whole SC-DMAP area” to exclusively the deployment of fixed offshore wind. This wording fails to recognise the potential to accommodate other types of ORE within overlapping areas through future DMAPs. Whilst it is accepted that this DMAP only considers fixed-bottom offshore wind and that identified areas A-D are only presently supported in policy terms for deployment of this technology, it is inappropriate to unilaterally and without any justification preclude any future consideration of the same geographical area for other ORE technologies (e.g. floating offshore wind).
- Policy Objective MA2 should be revised to confirm simply that this DMAP supports the development of fixed-bottom offshore wind within areas A-D for the duration of this plan. The objective should be amended to clarify that the potential future deployment of other ORE technologies within Ireland's maritime area, including floating offshore wind, will be subject to future DMAPs.

Mitigation Policy Objectives

- Policy objective MII restricts the submission of development permission applications for areas B-D until after the mandated regional level survey has been completed. The intended purpose of regional level surveys is to inform the assessment of potential in-combination and cumulative impacts. However, no explanation is provided of why a regional level survey is not required for area A or why development applications can proceed prior to such a survey being undertaken. The need for regional survey of Areas B - D but not A requires to be explained to avoid inadvertently exposing a future consenting application in Area A – Tonn Nua to potential challenge.
- Policy objective MII also defers the scope of the regional level survey to the DMAP Implementation Programme Board and does not specify how or whether the survey results should influence the development of projects in areas B-D, only that they should inform impact assessments. Section 3.4 indicates that “the scale and location of future ORE developments within Maritime Areas B, C and D will be informed by the outcome of these Regional Level Surveys...”. However, the policy mechanism by which a future regional survey can inform or influence the scale or location of development is unclear as the Draft DMAP contains no implementation mechanism to link the outcome of the future regional survey with the siting and design of ORE projects within areas B-D.

Environmental Policy Objectives

- The purpose and expectations of objective OEP2 are unclear due to the phraseology used so should be clarified through use of more succinct wording.
- Objective OEP2 references Habitats Directive derogation requirements and simply notes that these could apply at both plan and project levels. As drafted, OEP2 fails to report any conclusions from the NIS or to confirm whether or not a plan-level derogation is therefore required. This should be rectified by amending OEP2 to take account of the NIS, which also requires to be updated to address several weaknesses as detailed above.

- Objective UN3 requires the use of Best Available Techniques (BAT) for noise abatement in water depths exceeding 45m, without any explanation as to why this specific threshold is necessary and appropriate or how BAT will be determined.
- As drafted it unclear whether the requirement within objective CC1 to deliver multi-benefits relates to any potential benefits or only those related to climate change. It is further unclear what criteria would be applied, and by whom, to determine that a project delivers adequate and appropriate multi-benefits. Policy objective CC1 should therefore be recast to focus more directly on maximising the decarbonisation potential of the marine environment.

Given the very short window available for DECC to review consultation responses and finalise the DMAP prior to submission to the Oireachtas for adoption, to avoid delaying this process and the related ORESS2.1 auction we suggest that any concerns regarding proposed policy objectives which cannot be resolved through minor tweaks to wording should be tackled by simplifying the relevant policy objective within the DMAP and deferring the matter for further consideration within the Government's planned preparation of ORE planning guidelines. In the absence of a national spatial strategy or development plan for ORE, we are also conscious of the need for these ORE planning guidelines to underpin a nationally consistent and proportionate approach to ORE consenting and to avoid a patchwork of differing policy objectives, requirements, expectations applying across different DMAP areas.

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

Yes, Iberdrola Renewables Ireland broadly agrees that the Draft South Coast DMAP includes sufficient provisions regarding sectoral co-existence.

We are however concerned that, as drafted, policy objective SF1 requires developers (i.e. post site selection and MAC award) to investigate further options to reduce potential adverse impacts on fishing *"through avoiding areas of identified high fishing activity or, failing this, through minimising and/or mitigating impacts on fishing activity, including through optimising windfarm layout to facilitate coexistence"*. This open-ended requirement effectively allocates responsibility for achieving co-existence solely to the ORE project developer, which in the context of a plan-led model and the pre-selection of development areas by the State is not appropriate.

Given that areas A-D have now been selected by the Government for ORE development and subject to statutory impact assessment processes, it should be assumed that predicted impacts on the seafood sector will have been adequately assessed and deemed to be acceptable at a strategic level. Any required design mitigation or spatial restrictions should therefore be embedded within the DMAP, rather than policy objective SF1 allowing the re-opening the fundamental question of the suitability of areas A-D for ORE development in the context of achieving co-existence within future consenting processes. To address this weakness, policy objective SF1 should be recast to focus on promoting best-practice engagement and require applicants to demonstrate how they have sought to contribute

sectoral co-existence in line with the expectations of the DMAP and accompanying impact assessments.

In relation to co-existence with tourism, we welcome the recognition within the Draft DMAP that Fáilte Ireland research has found little evidence of negative impacts on tourism from visible renewable energy development. However, this finding does not appear to have been applied in the selection of areas as the remainder of the discussion on co-existence with tourism focuses on avoidance with landscape and visual related tourism features.

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

Yes, Iberdrola Renewables Ireland broadly agrees that the plan-led framework set out in Draft South Coast DMAP will effectively support economic and employment opportunities.

We must however note 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-2030's. 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. This is disappointing as adopting such a strategy at this juncture will not support the development of the robust pipeline of projects needed to catalyse growth in Ireland's ORE sector or associated supply chain beyond the award of a single site through ORESS2.1.

Whilst the Maritime Areas Identification Report indicates that Area A has the lowest LCOE of the Study Area remaining after consolidated constraints have been taken account of, the selection methodology has discounted substantial areas on the basis of receiving individual constraint ratings up to level 5/5 for which the associated criteria have not been published. We consider that the application of the area selection methodology is both over-precautionary and opaque in respect of prioritising constraints at the expense of removing large swathes of viable seabed from potential development.

As a result, the identified areas for ORE are sub-optimal from technical development and commercial viability perspectives. Combined with the current absence of survey data and uncertainty regarding what further data may be available ahead of the ORESS2.1 auction, this is likely to translate into higher risk premiums and contingencies being factored into auction bids. Providing additional survey data for areas B-D well in advance of future auctions or MAC processes for these areas would be essential to reduce uncertainties and risk premiums, but that alone is unlikely to offset the higher costs associated with developing in much deeper waters further from shore. Unless additional areas for fixed-bottom offshore wind deployment are identified in shallower waters closer to shore, the Government must therefore accept that their chosen ORE development strategy will neither minimise costs to consumers nor maximise the economic benefits of ORE deployment in Ireland.

Notwithstanding these concerns, Iberdrola Renewables Ireland will continue to play an active and constructive role in developing a supportive policy environment for ORE deployment and we look forward working with the Irish Government to deliver viable and affordable ORE generation capacity at the earliest possible opportunity.