



InisOffshore
Wind

**Draft South Coast Designated Maritime
Area Plan for Offshore Renewable Energy
Consultation Response**

26th February 2024

Introduction

Inis Offshore Wind (“Inis”) is an Irish offshore wind development firm working to enable a sustainable energy future for the people of Ireland. Backed by the Temporis Aurora Fund, our purpose is to harness Ireland’s vast offshore wind energy potential to accelerate and deliver Ireland’s energy transition to a clean, sustainable, low-carbon system.

Inis welcomes the opportunity to participate in Department of Energy Climate and Communications (DECC) consultation on the Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy. Inis’ recognises the huge importance of this publication and the role this will play in the future deployment of offshore wind in Ireland and our transition to net zero.

As a member of Wind Energy Ireland (WEI), Inis has inputted extensively to the industry response and is supportive of the points raised by WEI and would echo the concerns made about the policy statement and consultation.

Specific Points that Inis would like to raise applicable to both the Future Framework and the South Coast DMAP are as follows:

- Concern over the designation of ‘Maritime Areas’ by the state suitable for fixed offshore wind deployment, rather than their statutory mandate of environmentally assessing the Designated Maritime Area Plans (DMAP) and as such refining the DMAP area from this environmental assessment and constraints analysis.
- Clarity on the method and sequence in which seabed will be allocated under plan-led regime via MARA post ORESS 2.1, specifically with reference to development areas B, C and D.

Inis recognises the challenge of developing policy within such an uncertain environment, with significant targets to meet, and we would like to commend the department on the huge amount of work already performed through the 5 workstreams of economic analysis. To achieve our targets and deliver a return to the state, communities and reduce the impacts of climate change, a partnership approach between industry and government in the development of new policy will help in expediting this into the future.

It is important for the government to be mindful of attrition that may occur in this industry along the development lifecycle. Currently, between Phase 1 and 2, project attrition has not been adequately accounted for and the state is fully reliant on all these projects being successful to meet our targets. This has also not been addressed in either the Future Framework consultation or this consultation.

Consultation Questions

1. Identifying Maritime Areas for offshore wind development

The draft SC-DMAP aims to promote the sustainable development and growth of the maritime and coastal economies and the sustainable use of marine and coastal resources. Government has used an ecosystem-based approach to identify four Maritime Areas within which fixed offshore wind farms may be located in the draft SC-DMAP area. This involves making spatial and policy assessments based on environmental, social and economic data and information, and integrating the views of stakeholders and the public throughout the process. The identification of Maritime Areas has sought to avoid and minimise potential associated adverse environmental impacts, including impacts on biodiversity, EU Natura 2000 sites, and other existing marine users. This has taken place through the comprehensive environmental and technical analysis.

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

Inis's believes the statutory obligations held by the state in identifying DMAPs for ORE under the Maritime Area Planning (MAP) Act legislation differs from the method in which the State has gone about the DMAP process to date. DMAPs are to be proposed and if accepted by the Minister, drafted and subject to final approval, adopted by both Houses of the Oireachtas. As part of this plan-led process, the DMAP will be subject to statutory consultation, Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) in accordance with the Aarhus Convention and such DMAP will be refined to reflect the outcomes of this statutory environmental assessment.

The State, however, has not made any refinements or adjustments to the DMAP following statutory environmental assessment but rather identified four 'Maritime Areas' within the South Coast DMAP for the development of fixed offshore wind deployment. Inis does not agree with this approach. It appears to be beyond the mandate of the state for designating DMAPs under the MAP Act. The MAP Act, Part 1, Chapter 31 makes no reference to the state or the designated competent authority being required to identify 'Maritime Areas' within a DMAP and as such, Inis would question why this is being proposed as this approach will unnecessarily prolong and delay the further designation of DMAPs around the Irish Coast. It also stifles innovation for developers who are looking to operate in a heavily grid constrained country.

Once a DMAP has been environmentally assessed, refined, and adopted by the Government, it should be the responsibility of the industry, who are experts in their field, to identify the most suitable sub areas/sites for offshore wind farms. This promotes the development of offshore wind farms via a partnership approach, in the most suited areas, at lowest cost and increases the chances of such wind farms progressing through to operational stage. It facilitates development via the plan-led regime in the most efficient manner whilst not diluting the plan-led process, but rather reduces delivery risk to developers, the Transmission System Operator (TSO) and the state.

¹ [Maritime Area Planning Act 2021 \(irishstatutebook.ie\)](https://www.irishstatutebook.ie/eli/2021/act/12/section/1)

The issuance of four 'Maritime Areas' shows there is a longer-term view on offshore wind deployment post ORESS 1 and ORESS 2.1, but it is not clear how and when these areas will be awarded. The consultation mentions that developers may undertake surveys (subject to consent) in Areas B-D, perhaps in advance of any planned ORESS and this will be controlled by MARA. The industry will require clarity as soon as possible on the process that MARA propose to implement to achieve this. How do these 'Maritime Areas' fit into the recently published auction timeline that was published under the North Seas Energy Cooperation.

As a general comment on the South Coast Designated Maritime Area Plan: Marine Area Identification report, it is unclear what datasets have been used (as summarised in Tables 2.1 and 2.2), this is probably most important for commercial fisheries where understanding the age and resolution of data is key to confidence in it. The heat mapping approach has limited value, as can be seen in Figure 2.10 there is little material difference in favourability across the DMAP once the exclusions are taken into account. All areas are of relatively low constraint. In particular, Inis have little confidence in the LCOE mapping as a tool for selection of the Maritime Areas. There is no explanation of the scale applied to the LCOE analysis (i.e. is the difference between low and high orders of magnitude) or what weighting may have been applied to one parameter over another and this can be highly sensitive and skew results. Inis have undertaken their own LCOE estimates for locations within the DMAP and do not consider there to be credible material differences once you are beyond shallower coastal waters.

The four areas identified are quite restrictive in terms of capacity and it is Inis's view that the areas identified do not include the most optimal areas suitable for fixed offshore wind taking into consideration landscape and visual impact, other marine users, hard constraints, and environmental considerations. Critically a large clearly developable area to the south of Maritime Area B is excluded without any rationale.

Maritime Area A – the most significant issue is distance to shore (~12km at closest point). The Copper Coast UNESCO Global Geopark (Ireland's oldest UNESCO Geopark) is located between Tramore and Dungarvan. The seascape is particularly important for the Geopark and turbines of greater than 200m height will be visible at most times of the day and night due to night-time lighting. In addition, given the shape of the coast, there are potential significant effects from Hook Head to Ardmore. This 'amphitheatre' effect was one of the key issues for the rejected Navitus Bay project in the UK (which was also next to a UNESCO site). The site is constrained seaward by vessel traffic, so the only mitigation for seascape effects (i.e. moving offshore) would reduce the size of the site, flexibility and capacity. Although seascape issues are entirely subjective, they are tangible and potentially able to motivate large numbers of objectors.

With regard to the further Maritime Areas, with the exception of Maritime Area D (which is clearly a product of constraints) it is unclear why the boundaries are drawn as they are.

Area B – The western and southern extents of this Area are arbitrarily drawn. If the constraint was 75m then clearly there is scope to expand this area southward and westward by many kilometres. Figure 2.12 shows that constraints are lower seaward of the southern boundary. In addition, given the shipping to the north of the Area it would allow flexibility if detailed Navigational Risk assessment suggested that greater separation was needed between Area A and Area B. At this stage of the process with limited detailed geophysical or geotechnical information, there is no reason to limit the size of this area beyond hard constraints (such as depth). Development in other countries has repeatedly demonstrated the requirement for flexibility to allow for unknowns during the development process. It would be better to expand the boundaries out to the 75m depth (per Figure 2.3). This would greatly

expand the available area and allow for detailed work to establish the optimal location and capacity for a site in this location.

Area C – The N, E and W boundaries are clearly constrained, however, as per Area B above, Area C could be extended several km to the south which would provide additional flexibility.

In summary, if the approach of selecting Maritime Areas through this process is taken, the resulting areas should not be arbitrarily drawn and should allow for maximum flexibility given current understanding of the seabed conditions and uncertainties in conclusions of future impact assessments.

2. Sustainable development and environmental protection

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. A governance structure will oversee and monitor the implementation of the draft SC-DMAP including environmental impacts. Building upon and informing national, regional and local land and marine planning policy, policy objectives set out in the draft SC-DMAP will inform future decisions and assessments by relevant competent authorities on proposed offshore renewable energy projects and their enabling infrastructure, including for electricity transmission offshore and onshore. Any future offshore wind projects and associated transmission infrastructure within the draft SC-DMAP will also be subject to all necessary environmental assessment and State permits.

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?

Inis agrees that for any plan-led approach, the establishment of a strong governance structure is imperative to the sustainable development of offshore wind under that plan. It is important that this governance structure however does not hinder the efficient delivery of offshore wind within the DMAP.

Inherent in the above goal should be to carefully select project sites to minimise impacts, as discussed under (1) we believe that the boundaries of the Maritime Areas have been selected prematurely and may result in unintended suboptimal results.

3. Promoting shared use of the sea

The draft SC-DMAP ecosystem-based approach aims to maximise opportunities for co-existence between offshore renewable energy and other marine users and activities such as aquaculture, commercial fishing and seafood activity, and tourism and recreation, as well as the protection of the marine environment and biodiversity. The draft Plan provides that mandatory permanent exclusions on additional activities or usages within Maritime Areas identified for future offshore renewable energy development should be not imposed save relating to safety or in other exceptional circumstances.

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

There is a risk that the proposed method of identifying ‘Maritime Areas’ within the DMAPs, rather than refining the DMAP for multiple maritime usages (inc. offshore wind) may have the unintentional consequence to other marine users that the state is seeking to exclude from these areas rather than promote co-existence. Regardless of the provisions that have been included to promote co-existence, the designation of these ‘Maritime Areas’ are called out for fixed offshore wind development specifically.

In particular, it is unclear from the South Coast Designated Maritime Area Plan: Marine Area Identification what data have been compiled for the fisheries constraints. The age and resolution of these data will be crucial to understanding such interactions. To date, developers have engaged Fisheries Liaison Officers to engage with the fishing industry and get information on potential sites – it is unclear whether the DMAP process has undertaken anything similar. The fishing industry is likely to respond to this consultation with spatial information which could have implications for constraints. Again, this highlights the danger at this stage of limiting future flexibility by tightly defining boundaries now.

4. Maximising benefits for all

Independent economic analysis highlights that implementation of the draft SC-DMAP could generate significant economic and societal opportunities in Ireland, through inward investment and employment creation. The analysis also highlights that the majority of these benefits will be captured at regional and local level along the south coast. Maximising these economic benefits and opportunities is a key objective of the SC-DMAP.

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?

To date the transition to a plan led system has featured drastic turnarounds from government with the industry and WEI as its representative being largely kept in the dark to these changes. This has also affected the supply chain and ports view on the industry, with large market participants exiting and a significant port representative recently backing out of investing in offshore wind in the near term due to a lack of a clear offshore wind pipeline. A pipeline is a key step to encourage local investment in this industry and promoting the steady development of this industry locally rather than abroad.

Inis believes that a partnered approach with the Department of Enterprise Trade and Employment is crucial to generating maximum local economic and societal benefits. The industry needs to be provided with the confidence that this will be an enduring investment opportunity into the future and worth the investment.