



Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy (SC-DMAP): Public Consultation

Submission by Marine Renewables Industry Association

14 June 2024

The Marine Renewables Industry Association (MRIA) welcomes the opportunity to comment on the questions posed in the Public Consultation on the SC-DMAP and our views are set out below.

Q1: Do you agree with the four maritime areas identified for future offshore wind development in the draft SC-DMAP? If not, why?

- Generally, the template and areas chosen are satisfactory.
- Looking at Area A (where Phase 2.1 will take place), we urge finalisation of the State surveying arrangements. MRIA also suggests that the Department should undertake an initial metocean survey, utilising a Lidar, to facilitate progress of whichever developer wins 2.1. We recognise that the results from a metocean survey will not be available prior to the 2.1 auction.
- It is important to progress Areas B and C in 2025 and we look forward to hearing the plans regarding them at an early meeting of the Future Framework Implementation Group.
- There is considerable, broad rhetoric in the consultation document about market outlets for Areas B-D but no specifics. This is a key issue and ties into matters such as Private Wires policy etc. The Climate Action Plan (CAP) 2024 provides that a private wires policy framework be in place by Q4 2024.
- In this regard, actions 12 -15 of the Future Framework Policy Statement must be actioned without delay given the complex nature of such matters and including:
 - o the development of a successor support scheme to ORESS.
 - o identification of enabling supports to maximise capacity from alternative routes to market.
 - o design a competitive process to facilitate sea-bed access designated for 2 GW of non-grid limited capacity in 2025, to be in development by 2030; and
 - o develop routes to market as required for the 2 GW non-grid limited generation capacity in alignment with Action 4 of the National Hydrogen Strategy.

- We note that the area to the west of the DMAP is ‘sterilised’ from ORE
- There is concern over Area D – issues of concern include the shipping lane associated with the Area, water depth etc
- We are concerned too about ‘wake effects’, notably for the possible scope for developments in Area B to impact on wind ‘yields’ in Areas A and C. The impacts will be determined by site layouts, and we note that a compensation type arrangement applies in the North Sea in this regard
- Further review is required regarding ‘wake effects’ and discussion with industry should form a key part of this. This review could be undertaken in line with Action 23 of the Future Framework Policy Statement ‘*Establish a priority process to incorporate cumulative impact studies into the DMAP process as required by the MAP Act*’.
- Additionally, the concept of biodiversity net gain as recently referred to by MARA (*Energy Ireland Conference, May 2024*) and in line with the future development of a competitive MAC process (as committed to in Action 10 of the Future Framework Policy Statement), must be given due consideration considering the complex nature of this requirement as experienced in neighbouring jurisdictions.

Q2: Do you agree that the draft SC-DMAP policy objectives and governance approach for environmental protection, will support and guide its sustainable and coherent implementation?

- MRIA appreciates the need for policy proposals in the environmental area.
- We believe, however, that the governance focus should be on a *national* approach rather than a regional one which, as DMAPs roll out, will become (too?) demanding on developers and agencies alike.
- The key issue in this area is how will Marine Protected Areas (MPAs) be identified and implemented as the Government works towards the 2030 target of 30% of Irish waters designated for protection? Such designations may also be impacted by the EU Nature Restoration Regulation whereby the European Council (including Ireland) agreed that Member States would put in place restoration measures that bring at least 30% of habitats in terrestrial, coastal, fresh water and marine ecosystems that are not in good condition, into good condition by 2030 (with an exception for marine areas that have soft sediment habitats).
- The draft MPA Bill has yet to be published and passage of the Bill into law should not be delayed until after the General Election.
- The overall policy responsibility for MPAs should be transferred from the Department of Housing, Local Government and Heritage to the Department of *Environment, Climate and Communications*.
- MARA should be assigned responsibility (and resourced accordingly) to identify MPAs and to arrange for ‘policing’ against any infringements of MPA provisions, subject to appropriate safeguards to be provided for in legislation and via a code of practice as appropriate.
- It would be time wasting, confusing for all stakeholders and a recipe for conflict if the State were to establish a new body to designate etc MPAs alongside the recently established and respected Maritime Area Regulatory Authority.
- The Maritime Area Planning legislation provides for DMAP designations lasting for 6 years whereas the latest terrestrial Planning and Development legislation will provide

for a ten-year tenure for zoning. We recommend that the Maritime Area Planning provision move to a ten-year life, particularly given the long time spans involved in all ORE developments. Overarching policy alignment with the first statutory revision of the National Planning Framework (NPF), Regional Spatial and Economic Strategies and the forthcoming draft Planning and Development Bill once approved is also required.

- Some of the policy objectives suggested are too high level and of questionable direct relevance to ORE developers. Others require rewording or clarification - examples include:
 - WQ1: *'Protect and improve water quality...'*. We suggest that the word improve is removed here as it is inappropriate.
 - ML2: *'Projects brought forward under this plan should minimise electromagnetic field...'* – this will be challenging to do given the nature of ORE projects (electricity generation). We suggest that it should be amended to read *'Projects brought forward under this plan should seek to minimise the impact of electromagnetic field where possible...'*
 - SF7: *'Developers of proposed ORE projects and transmission infrastructure shall engage with potentially impacted seafood sector members and Irish registered fishers...'* ORE will communicate with all parties as required under the Seafood ORE Working Group agreed communications approach. However, MRIA believes that any compensation arrangements must be grounded on evidence and enforceable by law and focused only on fishers who are at an evidence-based direct loss.

Q3: Do you agree that the draft SC-DMAP includes sufficient provision for co-existence between offshore renewable energy and other maritime activities?

- The principal concern here is the potential for an adverse impact on the fishing industry of ORE at both survey and construction phases of ORE projects
- Two initiatives have been taken in that regard. First, the Seafood ORE Working Group is an important forum for fishers, ORE, and Government to meet, debate issues and identify mutually agreeable solutions
- Satisfactory progress has been made in this regard concerning dispute resolution and communications
- We welcome the initiative by DECC to conduct bilateral discussions with fishers and with ORE concerning co-operation payments.
- MRIA believes that any solution to coexistence issues must be grounded on evidence and enforceable by law and focused only on fishers who are at an evidence-based direct loss

Q4: Do you agree that the plan led framework set out in the SC-DMAP will effectively support and drive economic and employment opportunities, including along the south coast?

- MRIA welcomes the plan led approach
- The SC-DMAP economic framework is focused solely on the 5GW target and takes no account of such enabling matters as port developments and significant new grid provision
- One consequence is that the resultant GVA calculation results in a disappointingly low result.
- Ireland may expect relatively modest supply chain impacts from the '5GW' ambition which is based on mature Bottom Fixed Wind technology, will occur over a comparatively long time frame (most likely, beyond 2030), and is relatively small by European standards i.e. no supply chain companies are likely to make a significant investment here simply to service the 5GW target.
- *MRIA has consistently argued that supply chain development is tied to active promotion of the 2040 and 2050 targets, engagement with new technology (Floating Wind) and emerging technologies (Wave and Tidal) along with a vibrant R&D programme which goes beyond Bottom Fixed Wind. A key component of the development of any new industrial sector here - well proven by the Irish experience in sectors such as electronics and biotechnology - is a programme of R&D at the leading edge of the sector. This assures investors (notably, FDI) that Ireland has scientific and engineering skills and expertise well beyond the needs of immediate opportunities. Among other things. It helps to overcome a perception that the country's scale and, in this instance initially small, opportunity is unattractive and, perhaps, even risky for investors.*
- More generally, and post Government approval of the SC-DMAP, the identification of DMAPs for all coasts with associated timelines etc should be a Government priority to underpin investor confidence and allow for the planning of supply chain and infrastructure development and the development of routes to market.
- In this regard, Action 18 of the Future Framework Policy Statement aimed at identifying the resourcing needs, both current and capital, across Government Departments and agencies to ensure all Government bodies in relevant marine, ecology, planning, relevant industrial development and ORE disciplines are properly resourced to discharge the expanded responsibilities to attract the economic value as set out under the Future Framework is key to ensuring that economic and employment opportunities are in fact realised.
- Also, ensuring prioritisation of offshore renewables via timely transposition of EU Acceleration Provisions provides a tangible means to reduce significant consenting risks associated with the delivery of offshore wind proposals whilst underpinning investor confidence and providing an improved pathway for supply chain interaction. Such provisions should be utilised for all future DMAPs (including Renewable Acceleration Areas (RAAs)) to ensure compliance with EU law and delivery of offshore project proposals in an expedited manner.
- Climate Action Plan 2024 Action RE/24/5: *'Progress the development of a proposal for an offshore renewable energy innovation park'* and associated

output: *'Finalise and publish a Designated Maritime Area Plan for the development of an offshore renewable energy innovation park'* (timeline for delivery Q4 2024).

- It would be helpful for industry to understand how this action interacts with the future DMAP Roadmap to be developed as per Action 7 of the Future Framework Policy Statement and to including timelines for deployment and where overarching responsibility for planning, consenting and related requirements linked to such a development will lie.