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South Coast DMAP Submission,
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Ocean Winds & Bord na Móna Submission on the Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy

Ocean Winds & Bord na Móna welcome the opportunity to provide feedback on the Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy during the public consultation period and following the online public information sessions on same which took place in May 2024.

Ocean Winds & Bord na Móna welcomes the plan led approach proposed under the South Coast Designated Maritime Area Plan (SC-DMAP). The plan led approach is essential if the opportunity provided by ORE is to be fulfilled. It is appropriate and necessary that all offshore wind developments in Ireland will be located within maritime areas identified for this purpose by Government through the establishment of DMAPs to protect maritime resources, in line with the principles of the National Marine Planning Framework.

Our response will be discussed across the following key themes:

- 1. Support for Maritime Areas A to D**
- 2. Auction Timeline for Maritime Area A**
- 3. Governance Structure**
- 4. Validity Period of DMAP**
- 5. Data Repository**

6. Public Consultation

1. Support for Maritime Areas A to D

We support the designation of Maritime Areas A to D as areas exclusively for the deployment of fixed bottom offshore wind technology. We note the sea depths of Area A are aligned with supply chain capability for fixed bottom technology and believe that deployment at this location is our best chance to accelerate delivery of offshore renewable energy within reasonable costs and timeframes and therefore meet the target of 5GW of offshore wind by 2030. Areas B, C and D are in deeper water and will enable opportunity for fixed bottom deployment within the decade from 2030 to 2040. We welcome the opportunity identified in the plan to align offshore wind at these sites with industrial demand from the pharmaceutical, technology and data industries which will foster investment and jobs for the region. This is aligned with the recently published Offshore Wind Industrial Strategy. We note from the Plan that future DMAPs will be established. **We would like to see the momentum gained through the SC-DMAP process continued with the initiation of the East Coast DMAP process without delay.** There are excellent fixed-bottom sites with **good seabed conditions** along the east coast, close to electrical and industrial demand, which we believe will play an important role in delivery of our offshore targets between now and 2040.

2. Auction Timeline for Maritime Area A

We would like to draw your attention to Section 3.4 of the Plan where it is stated that the ORESS 2.1 auction is currently scheduled to commence in late 2024 or 2025. With the 2030 target in mind, we would strongly recommend that the ORESS 2.1 auction is carried out in late 2024 as widely understood and that the auction does not drift into 2025.

3. Governance Structure

We support the governance structure proposed in the SC-DMAP. We agree with the establishment of the SC-DMAP Implementation Programme Board within six months of the establishment of the DMAP, and with the establishment of the Marine Ecosystems and Ornithology Working Group and the Technical Working Group. However, we note that the composition of the Implementation Programme Board is not outlined in the DMAP. As such, whereas the principle of establishing an Implementation Board is supported, greater clarity would be welcome on its composition. The rationale for the composition of the Implementation Board should also be clarified.

It is noted that an Implementation Plan will be developed by the Marine Ecosystems and Ornithology Working Group for the SC-DMAP which will incorporate SEA monitoring

requirements to identify at an early-stage unforeseen adverse effects of the Tonn Nua development and to be able to undertake appropriate remedial action. It is also noted that DECC will fund the Marine Institute to develop a monitoring and research programme within the SC-DMAP area to monitor whether there are changes to the marine ecosystem following the development of ORE. The Joint Venture supports and commends both initiatives to stay diligent in our awareness of the impact of ORE on the marine environment.

4. Validity Period of DMAP

It is noted that the SC-DMAP will be formally reviewed in accordance with the relevant provisions of the MAP Act to ensure that it remains up-to-date and that it reflects the latest policy, environmental, technological and industrial developments. Consideration should be given to aligning the DMAP validity timelines with the revised timelines in the Planning and Development Bill for renewing terrestrial development plans, which have been extended from every 6 years to every 10 years. Given the development timelines associated with offshore development, a 10-year timeline would be more appropriate.

5. Data Repository

We support the establishment of a shared GIS Data Repository which can be contributed to and shared by State bodies, industry, environmental NGOs etc. This will undoubtedly support the development of projects in further DMAPs by providing a significant portion of the required baseline and monitoring information upfront, thereby reducing the burden on developers to collect the survey data and therefore reducing the time to Final Investment Decision and deployment.

6. Public Consultation

We commend the public consultation engagements as part of the SC-DMAP process. The combination of in person and online consultation events allowed for broad engagement and establishes a robust model for future DMAPs.

We look forward to working with the Department over the coming years as part of future DMAP processes and helping to achieve the ambitious plans for development of Ireland's offshore renewable energy targets.

With thanks,

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Project Director and Ocean Winds Manager for OW Ireland.

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Deputy Project Director Bord na Móna