



**Simply Blue**  
Group

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

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**14 June 2024**

We would like to thank the Department of Environment, Climate and Communications for the opportunity to respond to the consultation on the Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy.

## Introduction to Simply Blue Group

Simply Blue Group, headquartered in Cork, Ireland, is a leading renewable energy developer with a focus on replacing fossil fuels with clean energy. It develops pioneering renewable energy projects both offshore and onshore wind, sustainable fuels, marine energy, and low-impact aquaculture – all in harmony with the oceans and the land. The company has a global pipeline of 10 GW of floating offshore wind projects and 4 GW of fixed bottom wind and is committed to also developing competitive sustainable fuels projects in Canada, Ireland and Australia which will use green energy to produce sustainable fuels targeted at aviation and marine transport.

Simply Blue Group is committed to creating new local economic opportunities and develop projects that can co-exist with local communities.

With an experienced and passionate team, Simply Blue Group has offices in Cork, Dublin, Newquay, Pembrokeshire, Edinburgh, Belfast, Bilbao, and Nova Scotia. Simply Blue are partnered with EDF to develop floating offshore wind projects in Ireland.

Simply Blue Group also has an interest in development of a fixed bottom offshore windfarm within the South Coast DMAP area. This project is in the early development stages with a focus on a non-grid route to market.

This project, and Simply Blue Group's activities more widely, will contribute to the achievement of the targets set by the Future Framework; to deliver 7GW of offshore wind power, with 5GW grid connected and 2GW of non-grid limited capacity.

The project will contribute to the Irish Government's strategy of developing 37 GW of operational offshore wind power by 2050 to facilitate the move towards the net zero targets set out in the Climate Action Plan 2024. The project also supports the aspirations in the Offshore Wind Industrial Strategy to co-locate large energy users (eg. Energy Parks) with renewable energy generation.

## Key Themes of our Response to the Consultation

Our consultation response is aligned with that of Wind Energy Ireland and the Marine Renewable Industry Association (MRIA). In addition, we have summarised the specific elements of the South Coast DMAP that resonate most with Simply Blue Group into four main themes. These are:

1. Non-grid requirements
2. Timing & sequencing of the DMAP areas
3. ORESS vs MAC and,
4. Surveys to be undertaken by the developer or the State?

and are outlined below.

## 1. Non-grid requirements

There is an absence of any guidelines and a timetable on the non-grid route to market, which is fundamental to the delivery of the 2GW non-grid limited projects. We would like to see the guidelines and timetable presented in the South Coast DMAP. There is also uncertainty over whether DECC will specify the off-taker or whether developers will be at liberty to make their own partnerships? We need to see a clear and streamlined process within the DMAP that reflects the level of risk for the non-ORESS off-takers. We are also aware that there are no current legislative parameters for a private wire connection which negates the aspirations in the Industrial Strategy for co-location and may hamper the progression of some potential non-grid connected projects.

As with the cable routes / corridors, it is unclear whether Eirgrid will be responsible for the infrastructure relating to non-grid offtake (sub-stations and cables) and whether Eirgrid requires ORE developers to make an application for a grid connection in the event of a non-grid route to market.

LCOE for sites B, C and D will be higher due to the sea conditions (depth etc) and therefore LCOH off the South Coast of Ireland will be higher. We would advocate for MAC processes and fees to be flexible to reflect different kinds of risks between non-grid and grid connected offshore wind developments. We are however in favour of a 'competitive' MAC process in the future, in advance of any required verification of (or guidelines for) offtake / route to market. We strongly request that a working group is established for the 2GW non-grid limited capacity and that a timeline is prepared to provide developer certainty as soon as possible.

## 2. Timing & Sequencing

Timescales (beyond the development of area A, Tonn Nua) are yet to be decided, with the Regional Level Surveys cited as the mechanism to determine the 'scale and location' of proposed ORE developments in areas B, C and D. The SC-DMAP Implementation Programme Board is to be responsible for determining the scope and required Regional Level Surveys and this Board will be established within 6 months of the establishment of the SC-DMAP. There are no milestones or deadlines for this activity to take place and no clarity on whether there is a plan to deploy areas B, C and D sequentially or, indeed all together.

This uncertainty over timescales and sequencing is compounded by the 6-year Validity Period and the lack of guidelines relating to a non-grid route to market. We would strongly appeal to DECC to include information on timescales for the deployment of areas B, C and D. More clarity in this regard would also support Eirgrid's anticipatory investment efforts to build grid capacity on the South Coast in line with proposed developer programmes.

## 3. ORESS vs MAC

There are issues relating to Maritime Area Consents (MAC) related to the draft South Coast DMAP that are either explicit (for ORESS 2.1 for example) or yet to be clarified, for future ORESS or non-grid limited access to seabed.



We understand the need to expedite bringing offshore wind projects to the south coast and that the alignment of ORESS and MAC processes will support meeting government targets for projects in development area A (Tonn Nua).

The difficulty with having ORESS before MAC is that it removes the competitive element of the MAC. This competitiveness is however challenged by the current requirement that a developer needs to be awarded an ORESS in order to obtain a MAC (as is the case for area A, Tonn Nua, as defined as a 'single fixed ORE deployment with an installed capacity of approximately 900MW). We would like to see this (and future DMAPs) more clearly define competitiveness parameters.

There is no absolute certainty that being awarded an ORESS will ultimately result in achieving MAC. In order to meet the deadline of submission of a MAC 5 days after award of an ORESS, most developers will undertake a significant amount of work to complete the MAC process and will submit a MAC application eligibility to MARA in advance of a final MAC application. A number of negative outcomes will arise if the developer is unsuccessful in MAC after achieving ORESS including further project delays or cancellations and risks to project investability in the future. Developer bid bonds may also be forfeited in the case of an unsuccessful MAC application, this would amount to c. €20m for 900MW in Tonn Nua, another high risk for developers and investors.

#### 4. Surveys

Developers de-risk projects by undertaking surveys to provide data upon which to build financial models, which in turn generates an ORESS price that is more likely to result in a reliable return on investment. Undertaking these surveys is a significant part of development expenditure (DEVEX) and in other jurisdictions is not usually required in order to achieve site security (ie MAC). The necessity to align ORESS and MAC as outlined in the South Coast DMAP, with the successful ORESS project having 5 days to submit a MAC application post ORESS award, requires more 'up front' DEVEX expenditure which is less attractive for potential investors. A framework that provides for site security first (and ORESS later) is attractive for potential investors, as reaching this initial important milestone will provide confidence to unlock further funding along the development lifecycle. The draft South Coast DMAP suggests that the 'precise timing, process and methodology for MAC awards will be determined by MARA' and this lack of immediate clarity will deter the investor community.

Site investigation licences are also required by developers to undertake surveys. Given the current alignment between timescales for ORESS and MAC means that developers are not able to obtain survey information in advance of the ORESS auction. Despite promised government provided survey data, gaps will still be evident as some important data will be missing eg. Magnetometry, metocean, geo-tech. The lack of a full suite of data increases the risk and potential price at ORESS auction and the ultimate price to the consumer.

The draft DMAP states that the scope of level of survey works for areas B, C & D will be determined by the Implementation Programme Board and that these may be undertaken by the State or by the MAC holders, or by a combination of both. The uncertainty regarding the responsibilities for undertaking the surveys, which surveys should be undertaken by who (eg. Bird & mammal, metocean etc) and, if State led, the timing of these surveys in relation to the ORE developer programmes and

DEVEX requirements is extremely challenging, and we would urge clarity on these timescales in the final DMAP. We would also like to see a decision on whether bird and mammal survey timescales will be required to cover a three-year span in the future, rather than the current two years, due to the recent Avian Flu outbreak.

We would also request some transparency around the requirements to obtain a MAC for survey activity, either by the State or, by the developer, or whichever entity when a collaboration is formed. There also seems to be an anomaly between the requirement for a MAC to undertake a number of surveys and the need for the survey data to have been collected in order to make the MAC application.

### **Other observations**

- **Resource constraints**

We have concerns about the availability of personnel/resourcing requirements of State employees regarding this South Coast DMAP. Tonn Nua applicants have been encouraged to submit a declaration of MAC application eligibility prior to submission of the full application and this will add to resourcing requirements within government departments. Any resource constraints will have a knock-on effect on developer programmes. There is also the potential for the Tonn Nua (and future) processes to create ‘competition’ issues if one developer does not have access to MARA support and another does. We would request that the South Coast DMAP provides a robust application eligibility process that will not be overly onerous on MARA and / or developers.

- **Cable routes / corridors and islanded projects**

At present the South Coast DMAP excludes cable corridor and sub-station infrastructure locations for all 4 sites. We understand that Eirgrid is likely to be the responsible authority for making the application for a site investigation for a cable corridor route and ultimately a MAC for the development of the cable infrastructure from the sites to the shoreline. The alignment between Eirgrid applications and the developer programmes is of the utmost importance. Whilst we anticipate that Eirgrid will be in a strong position to be awarded a MAC, the timescales for achieving these are a significant risk to a developer.

There is also the outside chance that Eirgrid do not obtain a MAC and no clarity on what would happen to the project if this scenario were to occur.

The capacity output from each of the areas is conservative and therefore power output could be increased with larger turbines and closer density. This could result in sub-optimal efficiencies and ultimately that the areas may be underutilized.

## 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?*

*We welcome the publication of the draft South Coast DMAP and the need to delineate policy to advance the development of offshore wind in Ireland. In principle the areas chosen are satisfactory however there are a number of queries and uncertainties with the process and final sites that we would like to highlight to DECC when finalising the DMAP.*

- *Sequencing of the sites – we understand that Tonn Nua is the priority in the DMAP and that 800 – 900MW is aimed for deployment by 2030, with an ORESS auction intended to commence in late 2024, early 2025. There is however, less clarity on the sequence of subsequent ORESS auctions / MACs beyond Tonn Nua, for areas B, C and D, other than ‘over the next decade through an orderly, strategic and managed process of development.’ The uncertainty over timescales and indeed the sequencing of deployment has a knock-on impact on project programmes (and lead in times) and ultimately investor confidence. It is essential that an indicative sequence and timeline is provided in the plan.*
- *Route to Market outlets – The Future Framework notes the Irish government commitment in the North Seas Energy Ministerial in November 2023 to ‘procure over 11.5MW additional offshore wind capacity by end-decade, comprised of 2GW non-grid-limited capacity and at least 9.5GW of capacity to be procured via the successor scheme to ORESS’. The Action to commit to a competitive process to procure the 2GW’s in 2025 is not reflected in the South Coast DMAP and it is unclear as to whether the DMAP areas B, C and D should explicitly allow for this non-grid route to market. The draft DMAP notes that ‘beyond this initial ORE development to be located in Maritime Area A, there is no current pathway for connecting additional ORE projects developments within the SC-DMAP area to the onshore electricity transmission. The draft SC-DMAP therefore provides for future developments of both grid connected and non-grid connected projects...’ Clarity on the programme, timescale and non-grid guidelines are a crucial part of the DMAP.*
- *Queries over site selection methodology:*
  - *Scoring – the rationale for assigning the scores is unclear and it is important to note that scores underpin the entire site selection methodology.*
    - *GIS layers provided as part of this consultation did not include any scoring.*
    - *Scores were not published until 07<sup>th</sup> June 2024 reducing the opportunity for consultees to fully understand how scores were allocated.*

*This can be addressed by providing an online GIS viewer with the publication of the final SC-DMAP to provide transparency.*

- *Cumulative impacts – there are some concerns that the draft DMAP has not to date considered the full suite of cumulative impacts in that it focuses on areas B-D rather than Area A (Tonn Nua) and fails to take into account the projects outwith the DMAP area for example projects in the Celtic Sea that are subject to The Crown Estate leasing round 5. These should be considered for the final DMAP.*
- *Wake Effects – have also not been considered as part of the site selection process and are fundamental to development layouts in each of the areas. We request that DECC outline a clear policy statement on how wake effects between projects will be considered and regulated.*

## 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?*

*This South Coast DMAP is likely to set a precedent for future DMAPs and coherent implementation is key to its' success. There should be ongoing support at State level for the implementation of the plan led objectives of this and any future DMAPs. Whilst we welcome the eco-system approach and at SBG are working on nature inclusive design, it should also be noted that a number of policy objectives in the draft DMAP go beyond European, National and Regional biodiversity policies, are high level and difficult for developers to deliver, for example improving water quality and EMF.*

*A governance structure has been proposed within the DMAP. This is welcome; however, we would like to see further information on the membership of the groups and also the timescales for the implementation of the Working Groups and Collaborative Forum. The ability to deliver maritime areas B, C and D will be dependent on this. It is also not clear from the DMAP what the competitive process for areas B, C and D will be. We understand that a MAC will be required but that a 'competitive MAC award process' may be implemented (we anticipate that this will occur in the absence of the ORESS first, as in the case of Tonn Nua). Whilst we are advocating for a MAC before ORESS, as in the UK, we would like to understand the process for how future sites will be deployed.*

*The DMAP Validity period was set out in the 2023 DMAP Proposal as being 6 years after formal adoption of the DMAP. We concur with the WEI request for an extension of that validity period to 10 years. This better aligns with national decarbonisation policy, terrestrial and planning and development legislation providing for a 10-year tenure and the average long time-spans (10 years) for ORE developments.*

*Recognising that the government is working towards a 30% designation of Maritime Protected Areas by 2030, there remains some uncertainty over any overlap between MPAs and the South Coast DMAP and, should there be any overlap, what restrictions this may place on ORE development within the MPAs. We would like to see some assurances that ORE development can work in harmony with new MPAs. We would also seek that there is some consideration of the policy responsibility for MPAs being transferred from DHLG to DECC.*



### 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?*

*We fully support the need to encourage co-existence to be outlined in the DMAP and welcome that MACs should be awarded on a non-exclusive basis to facilitate this. We do have some concerns that the statement to 'maximise co-existence.....save relating to safety or in other exceptional circumstances' may be open to interpretation. We are also concerned to see that the 'burden of co-existence' is to be allocated to the developer. In a plan led system, the development areas have been pre-determined by the State, and we would therefore suggest that DECC (or its' appointees) should regulate this space and mediate to achieve solutions to issues where required.*

*Specifically, objective SF6 and SF7 relate to the protection of cables and seem to suggest that every metre of the inter- turbine arrays and export line will need to be designed to be capable of being overfished or over-trawled for the lifetime of the project. This has serious implications on the design, maintenance and overall cost of the cable infrastructure and we again concur with WEI in the request for a reword of these 2 clauses to be much more explicit so that developers can fully understand what needs to be provided for in designing cable arrays.*

*The co-existence objectives do not currently include for the Maritime Area Plans (MPAs) or for shipping (albeit we recognise that it is covered under Land & Sea interactions) and we would ask that these be taken into consideration in this section in the final SC-DMAP.*

*SBG is the Marine Renewables Industry Representative (MRIA) on the Seafood ORE Working Group and have been heavily involved in this Committee, notably its Coexistence and Related Issues Subgroup. There has been significant progress made with respect to dispute resolution and communication and there is an ongoing initiative, driven by DECC, to build a mutually acceptable framework for the ORE and Seafood sectors with respect to displacement payments.*

#### 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?

*The BVG Associates 'South Coast Designated Maritime Area Plan: Regional Economic Impact of Offshore Wind Development, May 2024' (for DECC) identifies that the SC-DMAP will deliver an estimated €4.4bn in Gross Value Added (GVA) towards the Irish economy and an estimated 49,000 full-time equivalent years of employment to the Irish economy. Of these, between €2.9bn - 3.1bn and 32,200 – 34,300 FTE years is expected to be captured in the south coast region (66% - 70% of the total Irish GVA). This study validates that there is significant economic benefit to be had from the SC-DMAP being aligned with pro-active and focused regional and national supply chain development.*

*SBG's registered head office is in Ardmore, Co. Waterford. We are embedded within the community in Ardmore, bringing our full global team to the village annually for a 3-day team building exercise. We have discussed the SC-DMAP with the Ardmore Community Group and they have supplied a letter in support of offshore wind as part of this consultation process.*

*SBG has proactively engaged with all (local, national and European) the elected representatives along the South Coast to garner cross-party support for offshore renewable energy. The Group are members and actively participant in the Cork Chamber of Commerce, Cobh and Harbour Chamber, Energy Cork and the Cork Region Industry Forum and have been promoting the transformative impact that ORE could have for the whole region. SBG have engaged directly with the fishing sector on the potential future benefits of ORE as their industry responses to pressures including climate change, overfishing and climate change. The Group have raised awareness of the social benefits in terms of new job opportunities during construction and subsequent operation and maintenance. Local communities have been targeted, notably schools, to promote support for the industry and influence students career choices by highlighting the scale of future job opportunities across numerous disciplines.*

*There is a recognised skills shortage in Ireland, which will have an impact on the development, manufacturing, operations & maintenance phases of an ORE project and these challenges will increase as the pipeline grows. Government intervention to support national skills development in line with the South Coast DMAP would be welcomed. It should be noted that there are institutions across the region who could, with additional government support, help to upskill and train new entrants for the ORE industry including SETU, MTU, UCC and the National Maritime College of Ireland as well as the SFI MaREI Centre headquartered in UCC.*