Draft South Coast Designated Maritime Area Plan

SSE Renewables Consultation Response

sse Renewables

Contents

Introduction

SSE Renewables wishes to make this submission for consideration as part of the Department of the Environment, Climate and Communications (DECC) consultation on the Draft South Coast Designated Maritime Area Plan (DMAP) for Offshore Renewable Energy.

Who we are

At SSE plc, we are driven by our purpose: to provide the energy needed today while building a better world of energy for tomorrow. SSE plc develops, owns, and operates low carbon infrastructure to support the transition to net zero, this includes onshore and offshore wind, hydro power, electricity transmission and distribution networks, alongside providing energy products and services to customers. With current interests across the island of Ireland and Great Britain, in addition to carefully selected international markets, including East Asia, Europe and North America, SSE is both growing its footprint and its range of expertise in our bid to lead the transition to net zero by 2050.

Since entering the Irish energy market in 2008, we have invested significantly in our Irish businesses, with a total economic contribution of over €2.2bn in the last 4 years, supporting over 3,000 jobs in 2022/23. SSE Renewables (SSER) owns 700MW of onshore wind capacity across 31 windfarms on the island, and operates a total of over 1,000MW. This includes Galway Wind Park, one of Ireland's largest and best performing onshore wind farms (co-owned with Greencoat Renewables). SSER is currently constructing additional onshore wind capacity in Ireland, and is actively developing solar and battery projects, as well as offshore wind projects like Arklow Bank Wind Park 2. SSER has operated a voluntary Community Fund in Ireland since 2008, and in 2022/23 donated over €1 million to 377 community groups in the vicinity of our onshore assets. We have also voluntarily invested over €500,000, since 2018 into communities near our Irish offshore sites through Sponsorship and Fisheries Funds as well as through key partnerships with local stakeholders.

SSE Airtricity supplies electricity and gas to over 740,00 home and business customers across the island and delivers home energy upgrades through our one stop shop, the Generation Green Home Upgrade, which aims to deliver 50,000 home energy upgrades by the end of the decade.

In addition to our renewable generation assets, SSE Thermal owns and operates 672GW of dispatchable generation in Ireland providing vital security of supply. SSE Thermal is developing new lower-carbon capacity through two stations in Kerry and Meath.

SSE plc is committed to sustainability. We have built the largest renewable electricity portfolio in the UK and Ireland and in 2020 committed to achieve net zero greenhouse gas (GHG) emissions across all

operations by 2050 at the latest, covering scope 1, 2 and 3 GHG emissions. Recognising the international importance of decarbonising the power sector as quickly as possible, SSE also aims to achieve net zero across scope 1 and 2 emissions by 2040 at the latest including through investment in low-carbon dispatchable power generation options such as Carbon Capture and Storage, Hydrogen and electricity storage.

Executive Summary

SSER appreciates the opportunity to provide feedback on the Draft South Coast DMAP. SSER is actively participating in auctions globally – with notable recent success in the Netherlands' offshore wind tender as of June 2024. SSER has extensive experience in developing offshore projects across jurisdictions, which has informed our submission, which acknowledges the benefits of a plan-led model while highlighting the complex nature and risks associated with its implementation. We have emphasised the need for a robust process for spatial planning and data collection based on our recent experience across different markets and jurisdictions.

SSER broadly welcomes the Draft South Coast DMAP and would like to emphasize the importance of comprehensive and timely surveys of sites as early as possible so that bidders can be sufficiently informed before an auction. Additionally, when feasible, SSER advocates for the alignment of maritime sites and future DMAP identification with broader EU policies to streamline development processes. Auctioning more seabed areas and adopting a two-step auction process will **enhance competition and de-risk projects**, contributing to the achievement of renewable energy targets.

Key recommendations

SSER recommends the following positions in relation to the topics raised in this consultation:

1. **Auction Processes and Site Selection:**
    - Call for **transparent methodology** of constraint mapping as per the Wind Energy Ireland (WEI) response
    - SSER supports the WEI call to develop a compensation mechanism for 'wake effects', and for that mechanism to be included in the Maritime Area Consent (MAC) for the Offshore Renewable Energy Support Scheme (ORESS) Tonn Nua and future projects.
    - SSER advocates a **two-step auction process in future** for seabed rights and for support schemes to promote competition and enable more informed auction bids. SSER looks forward to seeing the DMAP Roadmap later this year.
    - Concurrent **auctions for sites A and B** are recommended to address Ireland's twin goals, security of supply and decarbonisation, more promptly.
    - SSER calls for alignment of maritime areas with **EU Renewable Acceleration Areas**, seeking clarity on the criteria used in making that determination.
2. **Implementation, Governance & Monitoring –** SSER supports the implementation, governance and monitoring structures, membership needs to consider all appropriate stakeholders. SSER suggests that the mechanisms and boards established can also be utilised for future DMAPs, rather than having separate boards for different regions, sites and/or projects. This is to avoid duplication, facilitate knowledge transfer and provide an efficient structure.
3. **Ports and Harbours –** SSER supports development aspirations for ports within the DMAP that can be utilised for Phase 1 projects and be further developed for projects within the Draft South Coast DMAP.
4. **Clarifying Objectives -** SSER agrees with the points called out in the WEI response regarding the objectives mentioned in the Draft South Coast DMAP where the language is somewhat

opaque and suggest that objectives should draw from other policy including the National Marine Planning Framework. Criteria for what technical requirements are needed as well as the assessment criteria are absent and unclear. Developers require clarity in order to cost the works required into a project design.

5. **Timelines and Data:** High quality data is crucial for successful auction and project outcomes. In addition to providing survey data to all bidders, SSE advises that data collected by a MAC holder should be transferable if the holder withdraws, ensuring that the time and data is not wasted if the project changes hands and can be utilised by a new developer. Data obtained by Maritime Usage Licence (MUL) holders should also be transferred to MARA at the appropriate time.
6. **Capacity and Grid Access**: There is a need for clarity on the actual capacity of projects, such as whether ORESS Tonn Nua represents a 900 MW or an 800 MW project. Clear guidelines from EirGrid are required for grid connection and non-grid potential regarding sites B, C and D, with an emphasis on ensuring that projects outside ORESS processes have equal grid access opportunities in line with EU requirements.

Consultation Questions

Identifying Maritime Areas for offshore wind development

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

Site Selection

SSER is generally supportive of the areas chosen. We would stress that **making survey data from the selected sites available as early as possible** will help to accelerate the deployment of renewables and contribute toward the derisking of projects, which will positively impact the bid price in ORESS. SSER welcomes the concept of spatial flexibility within the DMAP and looks forward to survey data to fully determine the usable area of the maritime sites.

SSER refers to and supports the WEI response regarding the 1-5 scoring levels and rating rationale. The environmental data layers figures in Appendix B of the Maritime Areas Identification Report offer a helpful overview of consolidated constraints. However, they fail to clarify where or why individual constraints received a rating of 5, which led to the automatic exclusion of certain areas, regardless of other considerations. SSER would welcome **methodology transparency** in this regard.

SSER advocates that when feasible, maritime areas should be aligned with EU requirements for renewable acceleration areas. SSER calls for alignment of maritime areas with **EU Renewable Acceleration Areas**, seeking clarity on the criteria used in making that determination.

SSER supports the WEI call to develop a compensation mechanism for **'wake effects'**, and for that mechanism to be included in the MAC for ORESS Tonn Nua and future projects. The mechanism needs to protect a project from potential losses due to wake effects of subsequent projects. By setting out and implementing a clear, concise, and fair mechanism it will give industry projects the comfort that the viability of their projects (and thus financial models and associated business case) will not be impacted by subsequent projects occurring in proximity. If the projects are impacted by wake effects, they recognise that they will be appropriately compensated in a regulated and consistent manner. This will enable further and ongoing development within the DMAP and allow projects to co-exist.

Timelines

As stated above, the more data available, the easier and quicker it becomes for developers to deploy projects in a cost-effective manner. Setting a time for auctions for the other sites as early as possible would add a higher degree of certainty and allow sufficient time for survey data to be collected. Based on our experience of the timelines required to licence and collect quality survey data, SSER recommends that more DMAPs and maritime sites are announced and survey work to commence across the south coast. 2030 is now less than six years away and considering the development timelines for offshore projects and supply chain limitations (i.e. geophysical and geotechnical survey contractors, vessels, materials, construction personnel etc.), it will be very challenging for Ireland to meet its offshore renewable energy targets for 2030. Looking on to 2040, it is essential that as many sites as possible are auctioned off so that Ireland can scale up quickly and achieve its 2040 target of 20 GW of offshore renewable energy. This survey programme will typically take **three years due to seasonal factors** and the need to analyse and amend survey scopes as required. We believe this should be carried out by the State and provided to bidders entering ORESS at least **12 months in advance of the auction**. If the auction is run with limited data in 2024 or early 2025, developers will have to carry out these surveys post award and will not reduce the overall timeline for delivery whilst increasing risk.

When feasible, the identification of DMAPs should take advantage of **REDIII policy** to maximise efficiency and make best use of available levers to accelerate the deployment of renewable energy. We would encourage DECC to utilise the tools being provided under REpowerEU to speed up permitting and remove bottle necks.

SSE recommends extending the **DMAP validity** to 10 years to ensure that DMAPs are more aligned with development timelines (10years+). This approach would also be consistent with the forthcoming amendments as set out in the Planning and Development Bill 2023 which shall extend the time period for terrestrial development plans from 6 to 10 years. Given the typical development timeline for an offshore project, this extended timeline would be more appropriate.

Maritime Area Consent

The duration of the MAC should as a minimum remain consistent with Phase 1 Projects. We believe consideration should be given to extending the MAC from 45 to 50 years given that the Phase 1 projects had completed years of extensive long lead surveys and developments, prior to MAC award. To allow Phase 2 projects a similar development and operational lifespan a MAC duration of 50 years would be appropriate. Consideration should be given to mechanisms that would allow the life of MACs to be extended, that would allow projects to be repowered and continue to provide low-cost sustainable electricity.

Port Development

Addressing the **capacity of Irish ports is crucial** to meeting renewable energy targets. Current research indicates that no port in the Irish jurisdiction is capable of supporting the deployment of offshore wind farms, with only Belfast Port in Northern Ireland potentially having this capability. This poses a significant challenge in terms of costs and timescales to achieving Ireland's ambitious renewable energy goals. SSER urges DECC to support development aspirations for ports by addressing the role for ports within the DMAP. Specifically that ports can be utilised for Phase 1 projects and be further developed for projects outlined within the Draft South Coast DMAP.

Data

In addition to providing survey data to all bidders, SSER advises that data collected by a MAC holder should be **transferable if the holder withdraws, and for MUL holders, data is transferred at any appropriate time after expiry of the MUL**, ensuring that the time and data is not wasted if the project developer returns a MAC and a new developer is selected. In the event of someone being awarded a MAC, developing the

site for example for 6 years before realising it is not commercially viable to them, and returning the MAC, the data should be made available to bidders in subsequent auctions, to inform the bidders and to speed up the development.

On a **Common GIS Repository**, SSER agrees with the concept of a shared repository, but feels there is duplication in the ORESS Tonn Nua Terms and Conditions. Therefore, we recommend removing section 11.1.6 of the ORESS Tonn Nua terms and conditions entirely and addressing these provisions within a MAC and/or a MUL as the MAC/MUL will continue beyond the period of the ORESS contract, providing a more enduring framework for data management. The Draft South Coast DMAP consultation already proposes that the SC-DMAP Implementation Programme Board will co-ordinate a data repository for data which is collected by holders of licences or authorisation granted by the State. MARA should be the single body holding and managing data from both MUL and MAC holders. While MARA can be the body responsible for holding and managing data, it could for example, assign the responsibility of making the data publicly available via the Marine Institute and/or Geological Survey of Ireland (GSI) via the INFOMAR project.

SSER recommends adopting **data transfer requirements** similar to those required by the Crown Estate via the Marine Data Exchange (MDE) in the UK. Under these requirements, licence holders are obliged to supply data, but with a **more practical timeline.** Requiring data within one month of completion of a survey is challenging, especially if the dataset is still live or unvalidated at that point. The Crown Estate and MDE model allows data sharing at an agreed future point when the final data set is available. This ultimately generates data which is more manageable and ensures that the data is complete and accurate. Currently, data as far back as 2020 is being supplied to the MDE under this model, allowing for final, complete and robust datasets rather than multiple iterations of the same data. Data security and accuracy could be compromised and the provision of data on a monthly basis will place an onerous burden on the developer and the organisation receiving the data.

Additionally, there are **commercial sensitivity** concerns about the request for “any technical and generation information, including statistical data, as may be requested by the Minister.” This could imply the need to share all the engineering studies and technical reports, which often contain proprietary and confidential information. Sharing such data publicly could expose sensitive commercial and strategic decisions to external challenges and as such SSER recommends removing this requirement.

Capacity

SSER suggests avoiding stated capacities of the sites in the DMAP, as this could potentially limit further expansion of the sites and will promote spatial flexibility to optimise marine space usage for future development.

Grid Access

Clear information is needed from EirGrid on how it will facilitate Areas B, C, D. Clarity is also needed regarding **arrangements for non-grid potential**. The paper mentions that non-grid potential applies to future deployments in the four maritime sites but the pathway and process for this is unclear as currently documented in the Draft South Coast DMAP.

A **grid access pathway** for projects outside of the ORESS process should be facilitated in Phase 2 and the Future Framework to ensure alignment with EU requirements which state that all projects should have an equal opportunity to connect to the Grid. In respect of this issue, it is imperative that CRU liaise with DECC to ensure that a barrier is not created which prevents the delivery of projects outside of the ORESS process.

Auction Processes:

Concurrent auctions for sites A (Tonn Nua) and B (Lí Ban) are recommended by SSER to address Ireland’s twin goals of security of supply and decarbonisation more promptly.

SSER advocates a future **two-step auction process** for seabed rights and for support schemes. This would promote competition and enables more informed auction bids. SSER looks forward to seeing the DMAP Roadmap later this year.

Sustainable development and environmental protection

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?

The draft policy emphasizes the importance of assessing Marine Protected Areas (MPAs) individually for their various environmental sensitivities. This tailored approach ensures that the unique characteristics and vulnerabilities of each MPA are taken into account, thereby preventing a one-size-fits-all strategy. Such individualized assessments can help in identifying specific environmental concerns and implementing measures to mitigate negative impacts effectively.

Empirical data and case studies from other regions have shown that offshore renewable energy projects can coexist with, and even benefit, marine ecosystems. For instance, offshore wind farms in the North Sea have become artificial reefs, providing habitats for various marine species. Sharing such positive examples and data can help inform and guide Ireland's approach, demonstrating that with proper management, renewable energy development and environmental protection are not mutually exclusive.

Ireland's Marine Planning Framework presents a significant opportunity to set the direction for marine development over the next twenty years. It's crucial that this framework effectively enables the development of offshore wind in line with the objectives of the Biodiversity Action Plan. This alignment ensures that Ireland can meet its renewable energy targets while also protecting marine environments.

SSER supports the principles and priorities identified for Ireland's marine planning system particularly the focus on facilitating Ireland's low carbon transition, supporting safety at sea, meeting the Good Environmental Status requirements of the Marine Strategy Framework Directive and supporting the maintenance and restoration of biodiversity.

Clarifying Objectives

SSE requests clarity, in addition to WEI, regarding objectives in the Draft South Coast DMAP where the language is somewhat unclear. We are conscious that the objectives set out in the Draft South Coast DMAP will affect the projects therein and hence where DECC or the Government more broadly has preferences or priorities as to how it wants offshore wind farms designed and managed, this needs to be unambiguously stated. The language used should be concise, accurate and explicit so that it is enforceable and actionable by the developer as the costs for undertaking tasks needs to be fully modelled and reflected in the bid price. We have presented some examples below of our thinking around particular objectives that we feel should be altered and/or omitted to ensure effective implementation at the project level.

Objective	Current description	SSER Comment
WQ1	"To protect **and improve** water quality, projects should carry out comparative analysis of routes and installation techniques, including the	It is noted that an assessment of water quality including modelling and the consideration of alternatives would be undertaken as part of the Environmental Impact Assessment Report (EIAR) that

	use of modelling to determine the scale of sediment plume relative to the sensitivity of the environmental receptors e.g., wading birds or aquaculture sites.“	would be prepared by a project for any application for development. It is not clear how an 'improvement’ could be attributed to and determined to have been achieved by undertaking the modelling and comparative analysis. Specifically, construction methods or micro-siting (within the area that has been chosen by DECC) would be very difficult to quantify and correlate with any improvement to, or indeed change to water quality that may arise.
ML2	“Projects brought forward under this Plan should minimise electromagnetic field (EMF) in the marine environment, including where necessary, through project design mitigation e.g., prioritisation of cable burial where possible. Projects should gather evidence to inform the project level impact assessment.”	There will be a technical requirement for cable specifications for any project and an assessment of EMF would be undertaken as part of any EIAR. It is acknowledged that understanding around EMF is rapidly evolving and generally there is less evidence relative to other topics. As such any proposed mitigation needs to be well thought-out and carefully considered with respect to the latest and best scientific knowledge which is typically undertaken at a project level. As this objective is currently written, it is not clear what will be required of the project in terms of minimising EMF and it would be more appropriate for a competent expert to consider EMF, including mitigation, at the project level. Further, it is not clear how this objective should be integrated, agreed with and balanced against technical specifications and other activities and stakeholders such as Eirgrid, fishers, etc.
UN2	“To minimise the risk of disturbance on biodiversity and the cumulative effects of underwater noise along with other pressures such as increased sedimentation, survey and installation works should, so far as possible, be programmed to be carried out at separate times to reduce potential for noisy or other disturbing activities to occur at the same time and which could affect the same area.”	Many of the environmental topics, including underwater noise and sedimentation will be assessed in the EIAR through quantitative modelling. This includes the potential for interactions and cumulative effects that arise from e.g. multiple surveys/ installation running simultaneously/ concurrently in the same area and there is overarching guidance in place from the National Parks and Wildlife Service (Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters 2014) in relation to the same that is applied to applications for development as well as MULs. The difficulty is defining an area: is this within the foreshore/ marine usage license area or would it be more suitable to specify distance from the survey/ installation that has been informed by scientific assessment?

UN3	"To support MSFD descriptor 11 that the introduction of offshore renewable energy, including underwater noise is at levels that do not adversely affect the marine environment. Projects should consider techniques such as adjusting the parameters of the pile stroke, soft-start piling activities, avoiding piling in periods of ecological importance, **delaying piling if mammals are spotted**, or using acoustic deterrent devices or sound barriers (where suitable) to avoid, minimise or mitigate to reduce those impacts on marine fauna. Best available techniques should be used to reflect the emerging evidence base on noise abatement for offshore wind developments in water greater than 45m."	This is a contradiction of section 4.3.3 Pile Driving of Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters 2014 "12. *Once an appropriate and effective Ramp-Up Procedure commences, there is no requirement to halt or discontinue the procedure at night-time, nor if weather or visibility conditions deteriorate nor if marine mammals occur within a 1,000m radial distance of the sound source, i.e., within the Monitored Zone*". We would suggest that consideration of and consistency with the relevant guidance would be more appropriate to ensure alignment.
CC1	"…To support Ireland's climate and renewable energy objectives by providing for ORE development. In addition to delivering renewable energy, projects **should demonstrate the integration of a multi-benefit approach into their project**, which may include the delivery of carbon sequestration, biodiversity enhancement, coastal management, water quality management or other ecosystem services through the project design and/or mitigation	An assessment of impacts, includes positive outcomes and interactions would be undertaken as part of any EIAR. However, as this is currently presented it is unclear what level of benefit will be acceptable to the Competent Authority and how this could be quantified as part of the financial models deployed for ORESS (given that there is no mechanism for consultation at that point). Further, there is currently no systematic approach or guidelines for evaluating multi-benefit approach in a quantitative manner and balancing the needs of the same. Notwithstanding, we would support consideration of multi-benefits as part of the ORESS process to ensure lowest price is not the only consideration in the auction.
SF6	"Any FMMS should include a Cable Management Plan (CMP) exploring options and identifying appropriate site-specific, substrate-specific inter-array and offshore transmission cable protection measures that can be installed to mitigate the risk of cable exposure and unintentional cable snagging by seafood/fishing activity. Consideration should be given to **prioritising the burial of cables** at a suitable depth where possible, as well	There will be a technical requirement for cable specifications for any project and an assessment of commercial fisheries activity will be undertaken within the EIAR. SSER recognises the importance of engagement with the seafood industry particularly around their concerns in relation to fishing in the vicinity of the array area and cable corridors and will endeavour to facilitate this where possible.

	as other types of **cable protection measures** compatible with relevant types of fishing for each area"	

Promoting shared use of the sea

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

Drawing from our experience, we recognise how important the relationship with commercial fisheries and other marine users is to offshore renewables' net zero growth strategies overall. All our operations are now built under an informed and holistic commercial fisheries strategy. This seeks to align our activities under a cohesive, consistent and adaptive framework, built on an understanding of the fisheries sector's needs and viewpoints. Our strategy is to create a platform that promotes a collaborative approach to co-existence, by operating through transparency, understanding, co-operation and education. We do this by bringing fisheries into our development process at the earliest opportunity, with a willingness to listen, learn and adapt, so we can take an informed approach to our decisions. We ensure fisheries input is considered in all our operations. For example, we were the first developer to conduct over-trawl of our array cables; we were the first developer to publicly launch a co-existence and commitment strategy and we are the first developer to develop an in-depth strategic model for mobile fisheries compensation under a pilot program.

Providing certainty for all licensed marine users, including developers and fisherman, is crucial to ensuring that all industries flourish through co-existence, and SSER welcomes the government's role in establishing clear guidelines and protocols to help prevent conflicts and ensure smooth operations for all parties involved. SSER would like to draw the Department's attention to the following text.

Under the **Policy Objectives for Seafood and Fisheries**, SF 1 in the Draft South Coast DMAP states:

"*Developers of proposed ORE projects and transmission infrastructure within the SC-DMAP area should maintain a record of engagement with Irish-registered fishers and the wider seafood sector regarding proposed survey activity and should optimise infrastructure design and layout to maximise opportunities for co-existence with fishing and seafood activity. Where* ***feasible, a reduction of potential adverse impacts should be investigated 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."***

SSER shares the concern with WEI that the wording in this text may complicate planning unnecessarily and conflict with existing policy. As such, we recommend the deletion of the bolded text above and replacement with wording as per the National Marine Planning Framework (NMPF) which states the following under Co-existence Policy 1:

Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts (including displacement) on other activities they must, in order of preference:

a) minimise significant adverse impacts,

b) mitigate significant adverse impacts, or

c) if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.

Driving economic opportunities

4. 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 development of offshore wind off the South Coast has the **potential to deliver transformative benefits** from an economic, social and climate change mitigation perspective. Emerging EU guidance emphasises the importance of integrating social, environmental economic criteria alongside cost considerations. This approach not only ensures that renewable projects provide low-cost electricity, but also deliver broader benefits to the local area and nationally, along with supporting other policies such as Powering Prosperity – Ireland's Offshore Wind Industrial Strategy.

Our Arklow Bank Wind Park 2 project, with a total investment of up to €2.8bn[1], exemplifies this positive impact on the local area by not only generating around 1.75TWh of renewable electricity annually but also could sustain approximately 80 long-term operation and maintenance jobs[2]. We have provided a case study below of Beatrice Offshore Wind Farm, which is a fully operational SSER project in Scotland, to illustrate the potential benefits such a development could bring to the South Coast.

Beatrice Offshore Wind Farm (588MW)[3]

Located approximately 13km from the Caithness coast, Beatrice became fully operational in June 2019 following seven years of development and three years of construction. It is Scotland's second largest operational offshore wind farm and is capable of providing enough wind powered electricity for up to 450,000 homes. Beatrice is operated by SSE Renewables on behalf of a joint venture partnership between SSE Renewables (40%), Red Rock Power Limited (25%), The Renewables Infrastructure Group (17.5%) and Equitix (17.5%).

With a capital expenditure of around £2.5bn, Beatrice was one of the largest ever private investments in Scottish infrastructure. Beatrice is operated and maintained from its base at Wick Harbour on the north east coast of Scotland. Wick – historically a fishing port which had seen a steady decline in activity over the past decade – was chosen as the operational base for Beatrice. SSE worked with the Highland Council to establish the availability of buildings on the harbour quayside which could be utilised as an O&M base, subject to renovation. Two historic derelict buildings on Wick's harbour front were purchased by SSE for restoration and development into the operational headquarters.

[1] Arklow Bank Wind Park 2: Socio Economic Impact Report. May 2024. https://www.arklowbank2offshoreplanning.ie/downloads/eiar/abwp2-appendix-21.1-socio-economic-impact-report.pdf

[2] SSE submits offshore planning consent application for Arklow Bank Wind Park 2 | SSE Renewables

[3] Beatrice Offshore Windfarm Limited project: Socio-economic impact report, July 2017. https://www.sserenewables.com/media/jqdhjrac/beatrice-socio-economic-impact-report-v2_bmf_final_200717.pdf

The approximate £15m investment transformed the buildings with them returned to maritime use. Around 90 employees are based in the buildings. These employees are needed to safely maintain and operate the wind farm during its 25-year lifespan.

The construction of the offshore wind farm has delivered significant local economic benefits including increased local spend in the region during construction, hotel use (particularly during the winter months) and a significant uplift in income and employment. There was a gross average of 890 people employed during the construction phase as well as sustained operations roles[4].

Beatrice contributed £460m to the Scottish economy during the development and construction phases, as part of a total £1.3bn contribution to the wider UK economy. Analysis by Biggar Economics also found that during development and construction, the project provided 19,110 years of employment in the UK. Over the 25-year operational life of the wind farm, the high level of investment in the UK and Scotland during this period is expected to result in 800 jobs in the UK on average each year[5].

Supply Chains

A key challenge for a new offshore market is to be sufficiently attractive to secure the supply chain needed to build out the projects, at a time when the technology is growing exponentially on a global scale. We know that there are likely to be bottlenecks in some areas, like vessels, in the latter part of this decade. Ireland will need a secure pipeline of projects in order to attract a global supply chain in a highly competitive market.

To help develop local supply chains, non-price criteria should be considered in auctions to selected developers who will most enable the development of local supply chains and overall national policy such as industrial strategies.

Conclusion

SSE Renewables is grateful for the opportunity to respond to this consultation. Should DECC wish to discuss the contents of our submission or ask any questions, please do not hesitate to get in touch.

[4] Beatrice, socio-economic repor,2017: beatrice-socio-economic-impact-report-v2_bmf_final_200717.pdf (sserenewables.com)

[5] Beatrice, Building for the Future, 2019: 22cf9a_f92d869d19c14f86b7aceb4dc304da2a.pdf (wixstatic.com)