



Consultation Response

DECC's Public Consultation on Draft South Coast Designated Maritime Area Plan (DMAP) – Draft Environmental Data Log

30th August 2024

CORIO

About Corio Generation

Corio Generation is a specialist offshore wind business dedicated to harnessing renewable energy worldwide. With our leading industrial expertise and deep access to long-term capital, we work closely with our partners in the creation and management of projects from origination, development and construction, and into operations.

Corio Generation is a portfolio company of Macquarie Asset Management operating on a standalone basis, with a project pipeline of over 30 GW.

Activities in Ireland to date

Corio Generation is already an active offshore wind developer in the Irish market, with the **Sceirde Rocks Offshore Windfarm** which it is developing off the West Coast of Galway, through the Irish and Gaeltacht based company, Fuinneamh Sceirde Teoranta (FST). FST is a joint venture owned by Corio and global infrastructure investor Ontario Teachers' Pension Plan.

In May 2020, Sceirde Rocks was designated as one of seven 'Relevant Projects' by the Department of Environment Climate Action and Communications as part of its plans to support the build out of 5 GW of offshore wind by 2030. Sceirde Rocks is the only commercial scale fixed bottom offshore wind project on Ireland's West Coast at present, which is home to one of the best wind resources in the world.

The results of Ireland's first offshore wind auction (ORESS 1) in 2023 represented a major milestone for renewable energy. Corio is delighted to have been one of the four successful Phase 1 projects, with Sceirde Rocks being awarded 450 MW of the 3.1 GW of capacity awarded in ORESS 1.

This project will be one of the largest ever infrastructure projects in the Connemara region. Once built, it will be the first commercial-scale offshore windfarm on Europe's Atlantic margin, set on Connemara's Gaeltacht coast. Sceirde Rocks Windfarm is set to generate enough clean electricity to power more than 350,000 homes. The project will help Ireland to achieve its goal of generating 80% of its electricity through renewable sources by 2030. Once operational, the project will generate enough renewable electricity to avoid an estimated 550,000 tonnes of CO₂, which is the equivalent to taking 180,000 petrol cars off the road. In terms of additional benefits, a multi-million-euro Community Benefit Fund will be available over a 20-year period to support a range of sustainable community initiatives locally, with €3.5 million to be invested annually once the windfarm is operational.

We welcome the opportunity to respond to DECC on the **Draft South Coast DMAP “Workbook 1 - Draft Environmental Data Log”**, following the recent consultation on the Draft South Coast DMAP in May-June 2024.

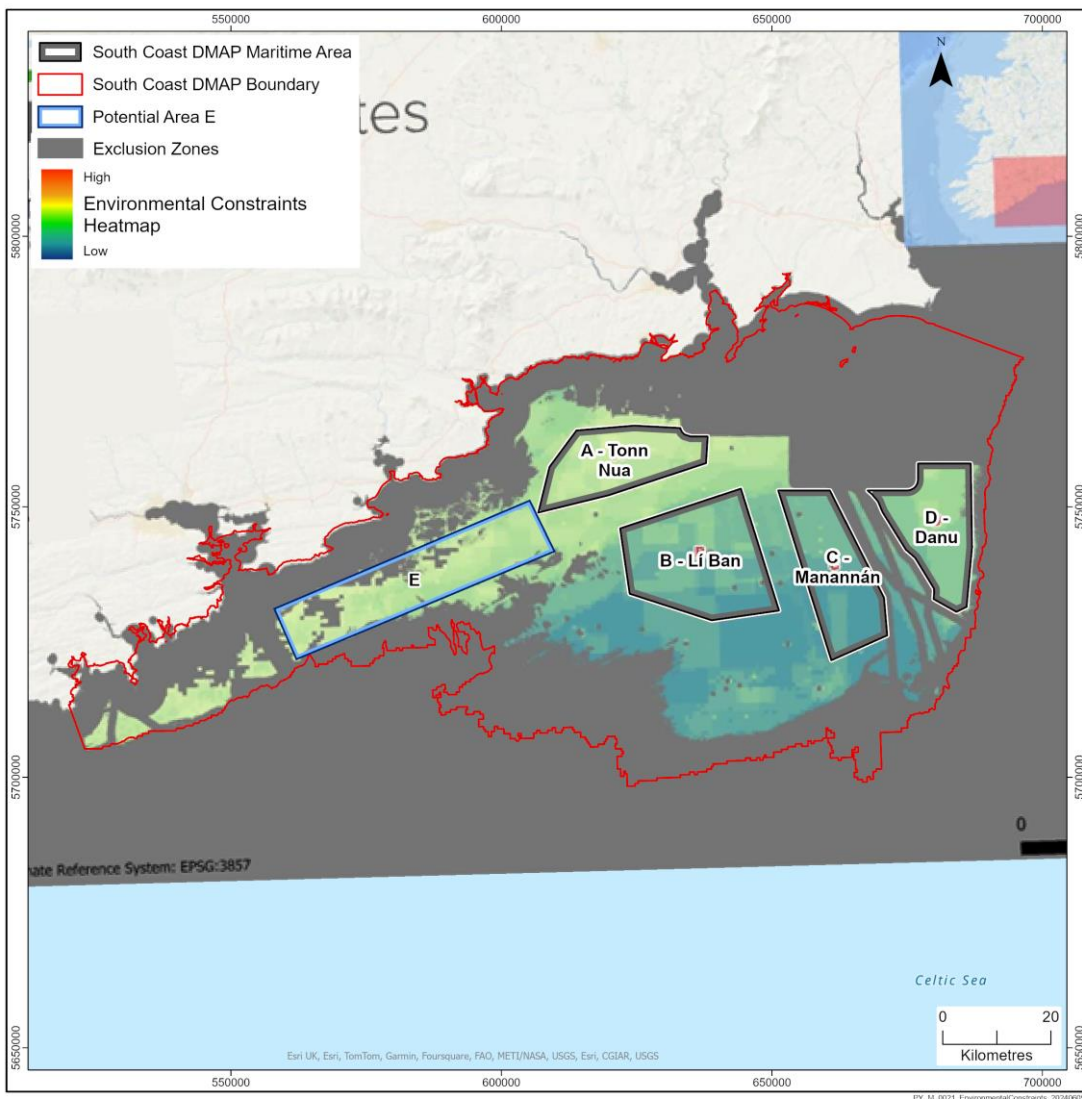
We agree with WEI that it is important that DECC continues to work with relevant stakeholders to ensure the success of Ireland’s first DMAP and set a clear pathway for future ORE development in the longer term. Commercial and technical deliverability before the mid-2030s and price implications must play a **key role in influencing site selection. Proposed “Area E” (outlined in turn) is a viable sea area which is realistic, reasonable, viable and implementable within the SC-DMAP, which can technically and commercially deliver on Ireland’s decarbonisation ambitions** within Ireland’s Carbon Budget 3 (2031-2035).

We wish to make the following points in the context of the South Coast DMAP and the Draft Environmental Data Log:

Inclusion of “Potential Area E” (see Map 1)

- As we have outlined in our response to the June 2024 Consultation on the Draft South Coast DMAP, we firmly believe that an additional “Area E” which is to the West of the SC-DMAP **within the Low Environmental Constraint area** should be included in the Final SC-DMAP. As outlined in detail in our previous response, this “Area E” is proposed due to its relative: 1) low LCOE; 2) high deliverability potential; 3) high electrical efficiency; and, 4) proximity to industrial demand centres in comparison to the Maritime Areas currently identified, coupled with its similar distance from shore to Area A.
 - **Relative LCOE and Delivery Timelines:** Areas A-D are **not located in the areas with the lowest LCOE and are likely to require significant support schemes to ensure their realisation and delivery**. “Potential Area E” not only has a lower LCOE, but is also likely to be deliverable ahead of Areas B-D, which WEI have indicated are *“technically challenging and not currently feasible for development, with projects not expected until the mid-2030s”*.
 - **Seabed condition:** The **Draft Environmental Data Log** indicates that in the context of Row 38 of Consent theme/ topic “Marine Habitats”, the shelf sublittoral rock and biogenic reef was a data layer *“recorded as “no” for inclusion in the heatmapping but should have been recorded “yes” as it had been taken into account in the heat mapping”*.
 - This layer 38 indicates that Parts of “Area E” are excluded for maritime habitat reasons for exposed rock seabed (such as shelf sublittoral rock and biogenic reef), but in the absence of a detailed assessment being completed, we believe that this area should not be excluded for any such reasons at this point.
 - Moreover, we have a good understanding that such seabed would not result in any technical impediment to development in such areas (and many other areas may have similar issues with subsurface rock with shallow sediment cover). We have demonstrated at Sceirde Rocks that shallow sediment and exposed rock are not an impediment to project delivery and there is an effective foundation solution for this type of seabed.
 - **Wave heights**, which have a significant impact on project costs and site accessibility, and are considerably higher in Areas B-D versus “Potential Area E”.
 - **Electrical Efficiency:** “Potential Area E” also has much shorter relative export cable lengths and would result in lower electrical losses and delivery costs.

- **Proximity to Demand:** “Area E” would be significantly closer to the Cork region, which has **significant power demand onshore for both residential and industrial customers who require the lowest cost indigenous green energy to be produced.**
- **Distance from Shore:** “Area E” is a similar distance from shore as Area A, and therefore should not be ruled-out this basis.
- There are clear benefits to prioritising offshore wind development within this low LCOE “Area E”, given the decarbonisation targets Ireland needs to urgently achieve.
- **The inclusion of Area E (possibly in lieu of Area D), in the SC-DMAP would afford MARA the opportunity to make available a less constrained amount of seabed, which is still in a low environmental constrained area (as per Map 1), while also ensuring commercial and competitive tension amongst developers remains in place in awarding development rights.** Having multiple initial future framework sites (i.e., B-E) for developers to present propositions on would ensure that a steady volume of successive projects could be delivered over the next 15 years. **It is imperative that Ireland’s growing decarbonisation targets aligns with the 10-year delivery period for offshore wind project from the point of initiation.**



Map 1: Location for Maritime Areas, also showing exclusions and environmental consolidated constraint rating based on data presented in Maritime Areas Identification Report: Figure 0.2

Additional feedback on the Draft Environmental Data Log

- We support the general comments of WEI that it is not clear what level of decision was taken to add or remove information from the heat mapping exercise. In some instances, activities with high scores have not been added into the heat map (e.g. ref line 38 of marine infrastructure). It is assumed that the omission is because the activity is outside of the study area - but this is not clearly explained. In addition, some areas such as fish nursery areas for Hake, Horse Mackerel and Mackerel (ref line 1,3 and 5 of fish and shellfish) have been omitted from the heat mapping, even though nursery areas for these species appear to extend into the study area. Ref: data sets in [Ireland's Marine Atlas | Marine Institute](#). We concur with WEI that it would be useful if a column could be added to the right of column 9 which explains the logic for inclusion or omission of data from the heatmap as it is not always clear to the reader.

Seascape and landscape data layers

- The Dataset and Layer Column for these data layers are named as 'Effect of wind turbines on Seascape'; however, it is understood from reviewing the Maritime Area Identification report that no impact assessment has been carried out (and if one has, it has not been provided or detailed). The visual impact of a wind farm will be determined by several factors and a key one will be turbine size and layout; as DECC have not shared the basis of the analysis, rewording is important to consider. Therefore, we concur with the view of WEI that the term 'effect' should be removed, as it may lead to a misinterpretation that an assessment has been carried out.
- It is assumed that the Draft OREDP II assessment referenced on Page 183 the DMAP SEA is for information purposes only as it is not aligned with the distances provided in the environmental data log and details of this assessment have not been included or made available for review during this consultation. Noting that rating of each data layer is subjective and is a snapshot only of a theoretical seascape constraint, greater uniformity is required in relation to the grouping of distances. It is not clear why lines 2-3 have been grouped together and given a score of 4. It is also not clear how the distances were chosen and why they are not evenly/logically spaced. Some explanation of this would be warranted with subsequent amendment of the table. More broadly, we wish to note that OREDP II has not been finalised, and should not be relied on for emphasis of certain environmental layers which were contested and, in some cases, incorrect, as flagged in the consultation feedback received on the Draft OREDP II.
- We also wish to flag the editorial feedback that WEI have raised in relation to these layers.

Wake Effects

- We wish to reiterate that in this Plan Led approach, the Government should clarify what the approach is to deal with wake effects from the Project in Area A (and/ or "Area E") from subsequent developments within Maritime Areas B-D and how or where in the process this will be dealt with. Not defining or providing clarity on this at this stage adds both uncertainty and delivery risk to potential projects. Having a working expectation that this is a matter that should be commercially resolved between relevant developers should not be assumed. In their role as lessor, it would be more practical for an appropriate state authority to develop any compensatory framework to deal with this matter.

Concluding Comments

We strongly advocate for the optimisation of renewable energy production from within the SC-DMAP. Commercial and technical deliverability before the mid-2030s and price implications must play a key role in influencing site selection; there does not appear to be clear grounds for not selecting a further site west of Area A based on the constraints mapping provided, with further potential if exclusion based on Marine Habitat (Shelf sublittoral rock and biogenic reef) is reconsidered. Proposed “Area E” is a viable sea area which is realistic, reasonable, viable and implementable within the SC-DMAP, which can technically and commercially deliver on Ireland’s decarbonisation ambitions within Ireland’s Carbon Budget 3 (2031-2035).

In alignment with the view of WEI (in their response), we wish to reiterate that the Maritime Areas Identification Report acknowledges that Maritime Area A is not located in the area with the lowest LCOE and has been pushed further offshore. Similarly, areas B-D are technically challenging and not currently feasible for development, with projects not expected until the mid-2030s. **As WEI have also stressed, “the logical outcome of this deliberate strategy to locate fixed-bottom ORE within deeper waters further from shore is that ORE deployment in Ireland will be more expensive and slower than it could otherwise be”.** For these reasons, we firmly believe that “Potential Area E” (as indicated in Map 1) to the West of the SC-DMAP within the Low Environmental Constraint area should be included in the Final SC-DMAP as this will ensure the swiftest realisation of the potential of the SC-DMAP which will otherwise be delayed through reliance on areas B, C and D. As previously detailed in our June response to the Draft SC-DMAP Consultation, this “Area E” is proposed given its relative: 1) low LCOE; 2) deliverability; 3) electrical efficiency; and, 4) proximity to demand in comparison to the Maritime Areas currently identified, coupled with its similar distance from shore to Area A.

We wish to thank DECC for the opportunity to provide commentary on the SC-DMAP Draft Environmental Data Log, and are available to discuss our feedback, at any stage. We look forward to the finalisation of the SC-DMAP.