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International and Offshore Energy Division  
South Coast DMAP Submission  
Department of the Environment, Climate and Communications  
Tom Johnson House  
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Submitted via email to: [southcoastdmap@DECC.gov.ie](mailto:southcoastdmap@DECC.gov.ie)

**RE: South Coast Designated Maritime Area Plan (DMAP) Environmental Data Log**

To whom it may concern,

WEI welcomes the additional opportunity to respond to DECC on the South Coast DMAP Environmental Data Log, following the recent consultation on the wider Draft South Coast DMAP in May-June 2024.

WEI is Ireland's largest renewable energy organisation with over 200 members who have come together to plan, build, operate and support the development of Ireland's onshore and offshore wind generation. We work to promote wind energy as an essential, social, economic, and environmentally friendly part of the country's low-carbon energy future. As a leader in Ireland's fight against climate change, wind energy creates and maintains jobs, invests in communities, and reduces CO2 emissions and contributes to our security of energy supply.

WEI would like to emphasize the following points detailed below that we believe are important to be taken into consideration in the context of the South Coast DMAP and with respect to "Workbook 1 – Draft Environmental Data Log". WEI and its members would like to work in collaboration with DECC and the relevant stakeholders to ensure the success of Ireland's first DMAP and set a clear pathway for future ORE development in the longer term.

### Comments with respect to 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, it is suggested that the term 'effect' is 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. The OREDP II has not become a formal policy document and as such, it should be made clear where previous analysis has or has not been utilised to inform the DMAP process to avoid confusion. Since the OREDP II has not been finalised, it should not be relied on for emphasis of certain environmental layers which were not verified following the OREDP II consultation process.
- 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.
- As previously highlighted by WEI with regard to distance to shore, we note 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. 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.
- Also, to note some small edits in this section of the data log:
  - There appears to be an error in line 4 - we assume it should read '25-35Km'.
  - There is duplication of text in the 'reasons for the score' column for Line 3 and we assume there is missing text before the brackets in line items 4 & 5.
  - We would recommend that these small errors are amended in the next iteration of the data log.

## General Comments

- **Offshore Array Area Draft Score (column 7):** We have reviewed the logic for the draft score in the SEA as presented in Table 7-6 on page 136-137 and note the process that was followed to agree scores. However, we feel that given these scoring mechanisms can be very subjective, some form of specific consultation (e.g. a technical workshop) with key stakeholders may have been more appropriate and transparent. This would be worthwhile considering in future DMAP development.
- **Inclusion of data in the heat mapping exercise (column 9):** 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: relevant data sets in [Ireland's Marine Atlas | Marine Institute](#)). 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.
- **Wake Effects:** As previously highlighted by WEI, with the move to the plan-led approach for ORE development within DMAPs and the recent publication of maps showing areas A-D in relative close proximity to each other, DECC needs to state a clear policy statement on how wake effects arising between projects developed within these plan-led areas will be considered and regulated. The policy will need to clearly state the requirement for subsequent projects in the DMAP, where possible, to mitigate for adverse impacts or if that is not possible, to compensate for revenues lost through wake effects on existing or already contracted / consented projects.

In conclusion, WEI would reiterate the need to ensure that the final DMAP is integrated, coordinated and aligned with all relevant existing, forthcoming and future government policies. This will support the robustness of the plan and pave the way for future DMAPs around the coast of Ireland.

We hope you consider the comments and recommendations made within this submission from WEI, and we would be happy to meet with you at any point to discuss this feedback.

ENDS



Policy Manager  
Wind Energy Ireland