

International and Offshore Energy Division
South Coast DMAP Submission
Department of the Environment, Climate and Communications
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14th June 2024

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

To whom it may concern,

Wexford has a significant coastline of 254 kms with a strong tradition of maritime and seafaring activity strongly influenced by the sea in its landscape and its people. Wexford County Council (WCC) fully supports the plan-led approach to the development of Offshore Renewable Energy (ORE) and recognises the contribution it makes to climate action and the opportunities it brings for coastal communities along the south coast.

Co-existence

WCC welcomes that the draft plan seeks to maximise co-existence with other maritime users and encourages the Department to continue to liaise closely with fishermen and coastal communities to ensure that developments cause minimal disruption. WCC also recognises the value of an ecosystem that is compatible and supports coastal communities to maximise economic diversification opportunities in the marine and blue economy.

Policy Objective CO1 states that exclusion zones should be avoided 'where possible' and should only be imposed for safety or in other exceptional circumstances. It is recommended that 'other exceptional circumstances' should be clarified to ensure that co-existence is not inappropriately constrained. It is also noted that the mitigation proposed in the SEA Environmental Report (ER) to amend the wording of this policy objective to include "permanent exclusions on activities or usages around or within ORE or transmission infrastructure located in the SC-DMAP should be avoided where possible, save relating to safety and / or environmental protection and / or in other exceptional circumstances" was not included in the Draft Plan and it is not clear why this mitigation was not included.

In addition, WCC notes that Policy Objective TEL 1 refers to there being no exclusion zones unless required for safety or environmental reasons. It does not refer to the other 'exceptional circumstances' referred to in Policy Objective CO1 and it is unclear why this is the case for TEL1 and not the other policy objectives of the draft plan. Co-existence will be crucial for maritime users and uses.



Policy Objective SF3 places an obligation on the impacted (i.e. commercial fisheries) to provide spatial information on how they would be adversely affected by a proposed development. WCC considers that such obligations should not be placed on the impacted and requests that this policy objective is amended accordingly or amended to support the fisheries in providing this information.

The draft plan should also refer to and support the potential preparation of DMAPs for other sectors in the plan area.

Ports

WCC acknowledges the opportunities for ports and harbours to expand to facilitate the construction and ongoing operation of ORE and the opportunities for associated economic development and job creation in and around the ports and also in nearby settlements e.g. Rosslare Harbour and Kilmore Quay, Wexford and New Ross.

The Draft Plan (Policy Objective PH1) supports the sustainable development of port infrastructure to enable the development of ORE within the DMAP area subject to the appropriate level of environmental assessment at plan and project level. WCC recognises some capacity constraints regarding landside infrastructure and port depths which are required to enable the development and operation of ORE by 2030, particularly at Rosslare Europort (notwithstanding the current proposals by Irish Rail to develop an ORE Hub by 2027). Therefore, WCC requests that the following policy objective is included in the final plan to support the provision of this infrastructure:

- To expand/support the expansion of Rosslare Europort, given its importance as a national strategic asset, to enable the development and operation of ORE in the SC-DMAP area.

Shipping Routes

The draft plan states that the highest density shipping areas were avoided but further project level studies will be required. WCC considers that the potential for future routes should also be explored, especially having regard to the exponential increase in Rosslare Europort resulting from Brexit, which may result in new channels which may also be required to be excluded.

Cable routes/Landfall locations

It is stated in the Maritime Area Identification Report that one 450 MW connection will be into the Great Island Power Station, Co Wexford and the second 450 MW connection into East Cork, with the specific location yet to be confirmed by EirGrid. If these are the proposed locations it would be appropriate that this is also identified in the draft plan and subjected to SEA/AA.

WCC also requests that Policy Objective ETS3 is clarified to ensure that the use of existing infrastructure to connect offshore wind generation to the onshore electricity system should be utilised only where such use would have equal or lesser impacts on people, the environment, landscape, etc.

Economic

WCC recognises the opportunities for economic development in coastal communities in terms of new local industry, supply chain developments, job creation and reskilling opportunities.

Section 9 Economic and Employment Growth Potential acknowledges the opportunities for new clusters of economic and employment along the South Coast and the economic benefits associated with the SC-DMAP and capturing domestic supply chain opportunities, which is aligned with established planning and economic policies and actions at regional and local level. WCC welcomes Policy Objective EC1 which supports research, innovation, skills development, enterprise, jobs growth and the sustainable development of economic clusters in the offshore renewable energy sector to support the development and operation of ORE projects in the SC-DMAP area.

There are also opportunities at Kilmore Quay to develop Operation and Maintenance (O&M) facilities including Crew Transfer Vessels (CTV) pontoons and supply chain industries. WCC are building strategic partnerships with Enterprise Ireland, SETU, Georgia Southern University, Tradebridge and the South East ORE to position the County and the region as leaders in energy security and supporting job creation opportunities. WCC have acquired 11 acres of land in the fishing community of Kilmore Quay and intend to develop a marine business park which will cater for O&M, training and research and development which will support an Energy Hub. WCC requests that the following policy objectives are included to support this:

- To expand/support the expansion of Kilmore Quay for the provision of O&M facilities required to serve ORE in the SC-DMAP area.
- To support the Kilmore Quay Marine Business Park which will provide commercial office space, innovative enterprise labs, research and development and sites for the marine and O&M sector enabling key infrastructure to establish a centre of excellence.
- To maximise the opportunities of the strategic assets of Rosslare Europort and Great Island in South Wexford in particular towards the creation of an Energy Hub.

Community Engagement

WCC welcomes the commitment in Policy Objective CE1 for continued engagement with local communities. The Community Benefit Fund will play an important role in community participation and to support sustainable community initiatives and should not be left to ORESS and future auctions. WCC requests that a Policy Objective be included in relation to the Community Benefit Fund and to ensure that such funds are not ring-fenced to any particular area (e.g. Areas A and B, although located off the coast of County Waterford, will also impact significantly on County Wexford communities). WCC would also request that those affected by climate change (coastal erosion), any economic displacement disadvantage be given priority in relation to this fund.

Visual

The SEA Environmental Report (ER) (pg 184) acknowledges that there is potential for long term impacts on visual amenity as well as landscape and seascape character from the presence of wind farm infrastructure.

Having regard to the significance of the impacts and the cumulative effects as a result of the four areas being in close proximity, it is considered reasonable that cumulative visual impact assessment, including viewsheds and photomontages, should take place (assuming the maximum number of turbines) and the impacts particularly when viewed from sensitive locations (such as Hook peninsula) and locations which rely on tourism should be considered.

Section 7.2 'Co-existence with Tourism and Recreation' references scenic coastal areas including the Hook Peninsula, scenic clifftop walks, beaches and ACA and Kilmore Quay. WCC requests that mention be also given to Bannow Bay, Saltee Islands, Tintern and scenic villages such as Kilmore Quay, Saltmills and Fethard which are important to the tourism industry and local economy.

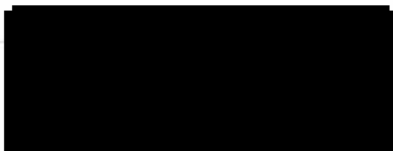
Consideration should also be given to the inclusion of landscape objectives e.g. to minimise through micro siting, design of substations etc.

Grid

As outlined in WCC's previous submission on the DMAPs Proposal, given the likely landside connection at Great Island, there is an opportunity to improve grid capacity in County Wexford which would improve electricity supply for consumers including for potential larger energy demand users (e.g. by strengthening the line from Great Island to New Ross) and improve timelines for grid connection of other onshore renewable energy developments required to meet our climate action targets, such as the significant number of solar farms permitted in the county.

WCC welcomes the opportunity to comment on the Draft Plan and requests that the above considerations be taken into account in the finalisation of the Plan.

Yours sincerely,



**Director Of Services
Economic Development and Planning**

