

# CONSULTATION FINDINGS REPORT

Public Consultation on the draft Offshore Renewable Energy  
Development Plan (ORED P II) 24 February to 20 April 2023

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## GLOSSARY OF TERMS

AA	Appropriate Assessment
Aarhus Convention	The Aarhus Convention is an international agreement that gives people the right to access information about the environment.
AMP	Adaptive Management Plan
BAI	Broad Area of Interest
Broad Areas of Interest	Broad Areas of Interest are areas of the Irish maritime space that have been identified as technically suitable for future offshore renewable energy development through the OREDP II assessment.
DECC	Department of the Environment, Climate and Communications
Designated Maritime Area Plans	<p>Designated Maritime Area Plans are statutory plans under the Maritime Area Planning Act of 2021.</p> <p>DMAPs can be proposed for all maritime sectors or defined geographical areas. The Department of the Environment, Climate and Communications will propose DMAPs for offshore renewable energy in particular areas based on best available evidence. DMAPs for the Future Framework will be based on the OREDP II.</p> <p>These DMAPs will form part of the basis for future planning decisions. They will be subject to environmental assessment and involve public participation.</p>
DMAp	Designated Maritime Area Plan
EEZ	Exclusive Economic Zone
GIS	Geographic Information Systems
GSI	Geological Survey of Ireland
MAP Act	Maritime Area Planning Act 2021
MARA	Maritime Area Regulatory Authority
MPPS	Maritime Planning Policy Statement
MSFD	Marine Strategy Framework Directive
MSP	Marine Spatial Planning

NMPF	National Marine Planning Framework
ORE	Offshore Renewable Energy
OREDPA	Offshore Renewable Energy Development Plan
ORESS	Offshore Renewable Electricity Support Scheme
Phase 1 Projects	Phase One projects are set of early-mover Irish offshore energy projects, each of which had already advanced under the Foreshore Act 1933. They satisfied the definition of “relevant maritime usage” under Section 100 of the Maritime Area Planning Act when this was enacted in late 2021.
Phase 2 Projects	Phase One projects may fail to secure a route to market or development consent, additional offshore projects will be needed to meet 5 GW by the end of this decade. This transition from Phase One to the longer-term Future Framework will be known as Phase Two.
pNHA	Potential Natural Heritage Area
PPS	Public Participation Statement
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEAI	Sustainable Energy Authority of Ireland
SPA	Special Protection Area
The Future Framework	The Future Framework (previously referred to as the Enduring Regime) is the State’s long-term vision for offshore renewable energy in Ireland. The State will aim to ensure that the economic, environmental, and social benefits of offshore renewable energy are realised for everyone. This includes choosing the right offshore technologies to use in the right places through the OREDP II.
SDGs	Sustainable Development Goals

## EXECUTIVE SUMMARY

The 2021 Climate Action Plan called for a new Offshore Renewable Energy Development Plan (ORED II) to be developed. The draft ORED II is a national-level strategy for the future development of ORE in the Irish maritime area. It is a key part of the future plan-led approach to ORE, in which the State will take a greater role in identifying optimal locations for ORE.

The Department of the Environment, Climate and Communications (DECC) commenced the process of reviewing the ORED I in 2021. This included convening an Advisory Group that comprised representatives from key stakeholder groups including ORE generation, fishers, academics / researchers, and environmental NGOs; a Steering Committee made up of policy leads from key sectors with interest in the maritime areas; and a Data and Scientific Group comprising data management and scientific staff from public bodies with expertise in the maritime area.

These committees informed the work of DECC in developing the Draft ORED II (see Appendix E for the composition, roles, and responsibilities of the ORED II governance groups). In addition, DECC appointed technical consultants, UK-based Clearlead Consulting, to undertake independent environmental assessment of the draft ORED II.

The objective of the ORED II is to support the change to a plan-led approach for future development of offshore renewable energy, rather than the historical developer-led approach. This will ensure that the economic, environmental, and social benefits of offshore renewable energy are realised for everyone. This approach is also supported by the National Marine Planning Framework.

On 24 February 2023, DECC launched an eight-week, public consultation on the draft ORED II and its associated environmental reports. The consultation included six in-person workshops, ten informal outreach visits to coastal communities, five online information events, and one exhibit at a trade fair – The Skipper Expo 2023.

During the 8-week public consultation, the Department's ORED II team and their consultants met with hundreds of stakeholders around Ireland, primarily in coastal communities. Members of the public were invited to make submissions by participating in a workshop or online event, completing a short online survey, or by sending their views by email or by post. This report represents an independent review of all responses received to the public consultation.

Over 1,100 people participated in the public consultation. The majority of responses were from coastal areas. Themes raised included the opportunities and challenges facing ORE development in Ireland; the role of Government in ORE development; how areas might be identified as suitable for ORE (Broad Areas of Interest); how ORE may impact different types of maritime users; protection of the marine environment; and how different users can work together to share the sea.

The contribution of various groups and sectors to this public consultation was vital in ensuring a comprehensive and inclusive consultation process. Key stakeholder groups were represented at workshops and through submissions received, including the Irish offshore wind sector, individual fishers and fisheries representatives, environmental organisations, State agencies, community groups, local authorities, port authorities, academics and researchers, individual citizens and many more.

Overall, attitudes towards ORE were positive. Stakeholders agreed that ORE is necessary for achieving climate targets, future security of supply and energy independence. It was also suggested that the sector presents numerous opportunities for Ireland. However, there were also concerns highlighted including on how ORE will interact with fisheries, what the environmental impact of ORE might be, and if the necessary supports will be in place in time to take advantage of this opportunity.

The main concerns of ORE sector related to the proposed criteria for identifying the Broad Areas of Interest and how the ORED II may impact plans for future development. For fisheries stakeholders, the potential impact of future upcoming ORE development on their industry and livelihoods was a major source of feedback to the consultation. Some environmental groups questioned the extent to which environmental considerations have been taken on board in developing the ORED II, and community groups cited both optimism and concern for the potential for ORE to impact local environments, tourism opportunities and local economies in either a positive or negative way.

Academics and researchers providing feedback spoke to the opportunities for greater collaboration on data gathering, management and sharing, while feedback from the Local Authority sector cited the need for greater clarity of local level governance of ORE, alignment with County Development Plans, and greater cohesion between terrestrial and marine planning going forward.

The draft OREDP II included a set of criteria that were proposed to be used to identify areas technically suitable for ORE. There was some disagreement from respondents on these, particularly on the technical criteria including the depth of water to be considered for wind turbines. It was suggested that the depths proposed by DECC were not appropriate for floating technologies and that fixed could be accommodated at greater depths. Concern was expressed that the criteria were restricted to just floating wind development and that the areas should not specify the type of technology permitted to allow for fixed bottom wind, wave, and tidal energy. It was also remarked that the criteria could include fishing / spawning grounds and environmental impact.

The consultation also received feedback on how the maritime space can be shared between different uses including ORE. It was generally agreed that it can be shared, however there were a lot of questions as to how this would be managed. These included how fishing vessels might navigate offshore wind farms, how health, safety and insurance could be managed and how ORE might support species or habitat protection. Some doubts were expressed for the potential for ORE and fisheries to share common ground.

It was generally welcomed that the State proposes to take a greater role in the future development of ORE; to support the realisation of economic, environmental, and social benefits of ORE for everyone.

However, faith in the ability of Government to deliver to time and expectations, frustration from the ORE industry at the timing of the OREDP II, and concern for the time it will take to implement other elements of the Future Framework, emerged throughout the feedback. There were also calls for a more ambitious OREDP II, for greater clarity on its scope and purpose, and to ensure that all relevant policies and plans were aligned and coherent.

The high level of feedback and participation at OREDP II consultation events demonstrates the timely and relevant nature of this listening process undertaken by DECC. The feedback provided through all channels is summarised in the following report and considered by DECC in finalising the OREDP II and associated environmental reports.

# OFFSHORE RENEWABLE ENERGY DEVELOPMENT PLAN - OREDP II

8-week Public Consultation: 24 February - 20 April 2023

## What we Did



- ✓ 16 in-person stakeholder engagement opportunities
- ✓ Workshop in Irish
- ✓ 4 online webinars
- ✓ Consultation website
- ✓ Consultation brochure
- ✓ Consultation survey via email / post / online

## 1,100+ Written / Oral Submissions



- 400+ at in-person events
- 340+ at online webinars
- 310+ survey responses
- 110+ email submissions, including from 87 organisations

## Survey Respondents Agree



- 81% agree ORE is important to achieve climate action targets
- 77% support State-led approach to ORE development
- 73% support criteria for selecting Broad Areas of Interest BAIs

## Value of OREDP II Workshops



- 82% found the focused discussions very useful / extremely useful
- 82% would recommend to others
- 74% said workshops helped inform their understanding of OREDP II

## Spreading the News



Extensive print, radio, social media and online promotional campaign - Irish and English



Our seas, your energy

## Where we Engaged

- Skipper trade fair

- 6 in-person stakeholder workshops, including 1 in Irish

- Outreach in 10 coastal communities

- 4 online webinars



## We Listened - Key Consultation Takeaways



### Benefits and Opportunities

- Local and sustainable energy supply
- Climate action
- Jobs and economy
- Training and education / research
- Support regional and community development including coastal / marine / island communities
- Maximise technology potential, including Hydrogen
- Shared maritime space



### Calls For

- Policy alignment and certainty
- Defined technical criteria to identify Broad Areas of Interest (BAIs)
- Reassurance for developers and investors
- Greater consideration of fishing impacts
- Greater role for local and regional government
- Inclusive governance and review
- Resourcing to execute the Plan
- Minimal environmental impact



### Future Considerations

- Develop evidence base
- Progress delivery of Designated Maritime Area Plans (DMAPs)
- Share consultation findings across Government
- Build expertise and knowledge
- Consider role of ports and infrastructure
- Undertake meaningful and timely stakeholder engagement and include even more coastal communities
- Include even more in-person events and sector-specific events



Riailtas na hÉireann  
Government of Ireland

Figure 1 - Consultation Summary



# 1 CONSULTATION PROCESS

The public consultation opened on 24 February 2023 and ran for an eight-week period ending on 20 April 2023. All documentation relating to the consultation including the draft OREDP II, supporting Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) (including an interactive SEA Digital tool), online questionnaire survey and consultation information were available online at [www.gov.ie/OffshoreEnergyPlan](http://www.gov.ie/OffshoreEnergyPlan).

A number of in-person regional consultation workshops, outreach in coastal communities and online information events were held to promote the consultation, convey key messages, and listen to stakeholder feedback on the draft OREDP II.

The workshops followed a structured approach, with an opening presentation by the Minister or DECC officials, followed by a series of facilitated discussions on specific elements of the draft OREDP II. Participants were encouraged to discuss the issues from different perspectives and to listen to one another's viewpoints. They were provided with worksheets to record their feedback and ensure all relevant points they wanted to make were captured for consideration.



**Figure 2 – Participants working in groups at consultation workshops**

Participants were allowed 15-20 minutes to discuss each topic, which focused on the opportunities and challenges facing ORE in Ireland, the criteria to identify BAIs, the proposed all-of-Government approach, the principles of shared maritime usage and the future review process and data management framework for the OREDP II.

Feedback surveys were gathered at workshops with a total of 161 returned. Of these, 82% of respondents found the focused discussions at the workshop very useful or extremely useful, 82% would recommend the workshop to a colleague or friend, and 74% said that the workshops helped to inform their understanding of the draft OREDP II.

DECC officials worked at all events in order to hear directly from stakeholders and thus fully be informed in their approach to finalising the OREDP II.

## 1.1 Workshops

### 1.1.1 Cork – 6 March 2023

The first workshop of the draft OREDP II consultation process was held in Cork on March 6th. A total of 79 people registered for the workshop including many representatives from several offshore energy developers, as well as from local authorities, the research sector, eNGOs, fisheries, the Port authority, and local business representatives.

The event was opened by An Tánaiste Micheál Martin, T.D., and Minister for Environment, Climate and Communications, Eamon Ryan, T.D. Both spoke to the importance of the OREDP II and its role in the future management of Offshore Renewable Energy development in Ireland.

Key points raised at this workshop included the need to address data deficiencies and suggestions as to how the data gathering and management framework could be supported including the need for industry to share their data and for a platform for them to do so. Several suggestions were made in respect of research requirements to be undertaken including environment and technology-related data, and the need to involve third level institutions to build out the OREDP II evidence base.

Participants gave feedback on the concept of shared usage, including the opportunities to collocate wind and wave energy together, to have an ORE development exist within a Marine Protected Area (MPA), and the potential for fisheries to co-exist with these developments. However, concern was also raised at whether the fishing industry is being adequately heard in this process, and whether some broader concerns around shared usage such as insurance, health and safety etc. will be considered.

### 1.1.2 Killybegs – 13 March 2023

A total of 64 people registered to attend the workshop in Killybegs, with a strong representation from the local fishing community and maritime industry sector. Representation was also present from local authorities, Government Departments, and community groups.

Participants at the workshop cited the importance of Killybegs retaining its maritime heritage and suggested that ORE presents opportunities for the area in terms of job creation, as fishing is often seasonal and it would also help to keep young people in the locality. The generation of green hydrogen to help in decarbonising the fishing fleet was a recurring theme, as was the “strong levels of wind” in the county. The potential for Killybegs to benefit from the OREDP II was emphasised, and participants flagged existing and planned infrastructure in the harbour town as being central to a successful ORE industry in the North West.

It was stated that “weak grid infrastructure in the North West” needs to be addressed in order for the area to benefit from ORE. Stakeholders referenced “electricity black-outs” when there is a “surge” due to fishing factories in full operation. It was also cited that interconnection with Northern Ireland / Derry should be considered. The need to develop other new infrastructure in the North West to facilitate ORE was also highlighted such as piers and ship lifts. The importance of bringing the fishing community along on the journey by involving them from the earliest stages was deemed critical, and attendees emphasised the need to consult with all maritime users. Clarity on shared use, navigation within ORE developments, and exclusion zones on wind farms were also deemed important. It was also stated that “time is of the essence” for Ireland to move forward in developing ORE and that Ireland “risks losing out to other countries” by spending too much time in “courts and judicial reviews”.

### 1.1.3 Foynes – 14 March 2023

The Shannon-Foynes workshop saw a total of 45 registered for the event. Local Deputy, Brian Leddin T.D. opened the workshop, welcoming participants and highlighting the importance of consultation on the OREDP II for the local area.

The workshop was attended by representatives from local agencies such as the Shannon-Estuary Economic Taskforce, Limerick Chamber, Shannon-Foynes Port Company, and local authorities. Participants also represented the fisheries sector including Bord Iascaigh Mhara, the Sea Fisheries Protection Authority and the Irish Farmers Association Aquaculture Division.

For participants in Foynes, the issue of supporting infrastructure was key. ORE was identified as an important opportunity for the economic development of the mid-West, with the importance of upgrading ports such as Shannon-Foynes to accommodate ORE emphasised. Participants also cited potential ancillary benefits for the region including improvements to the grid, tourism opportunities, opportunities for training and education, and jobs in servicing, maintenance, and construction.

### 1.1.4 Ros a Mhíl – 23 March 2023

An Irish language consultation event was held in Ros a Mhíl, Co. Galway. 38 people registered for the event, including representatives of the local fishing community, Údarás na Gaeltachta, the maritime sector and local tourism providers.

Participants at the workshop in Ros a Mhíl had particular questions on what the OREDP II would mean in terms of local level development and what the benefits might be for the immediate area. It was suggested that there should be a benefit to a local area where energy is produced, but that any investment should be managed locally.

The needs of the fishing industry were a key consideration. Participants noted that consultation with the fishing community should precede any decision on the identification of an area, and that there needs to be better engagement with the aquaculture and fisheries sectors.

### 1.1.5 Dundalk – 24 March 2023

Workshop participants in Dundalk, for which 48 people registered, mirrored the views of those in other areas. There was a greater focus on the potential of the East coast for future ORE development and the need to consider an all-island approach to realise the benefits of ORE.

Minister for the Environment, Climate and Communications, Eamon Ryan, T.D., delivered the opening address and he then participated actively in the discussions, sitting with stakeholders at different tables to probe issues regarding OREDP II and listen to their feedback. Participants included representatives from ORE developers in the local area, local business groups, the Industrial Development Authority and academics from third level institutes.

Several comments were made regarding the need for greater State and Foreign Direct Investment (FDI) in the ORE sector in Ireland. There was discussion on supply chain and supporting infrastructure, and several suggestions as to how ORE can integrate with aquaculture to increase efficiencies.

Feedback included that Dundalk has strong potential for ORE developments because of its proximity to both Dublin and Belfast and their ports; is on the direct motorway from Belfast to Rosslare; has its own ports in Drogheda, Dundalk and Greenore; and is close to grid interconnections with Wales (existing) and Northern Ireland (planned). But it was also stated that further investment is needed in local ports and roads to facilitate construction and operation of ORE projects in the North East.

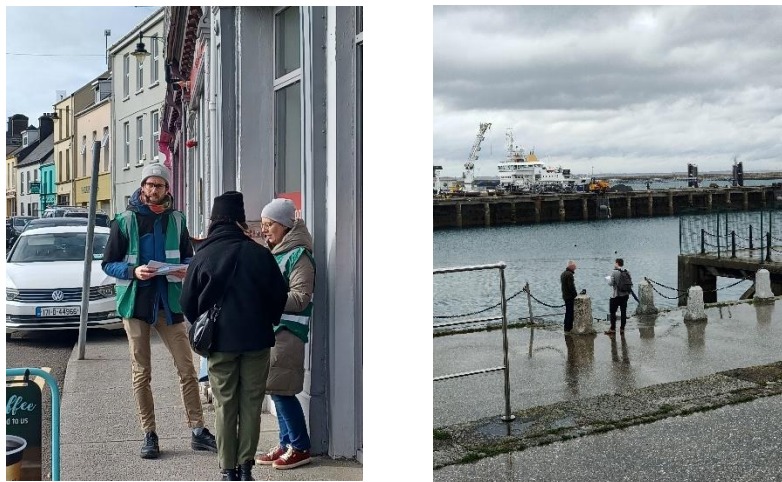
### 1.1.6 Arklow – 14 April 2023

The final workshop in the consultation was held in Arklow, Co. Wicklow, with 52 registered to attend. The event saw a greater focus on the visual and environmental impact of ORE developments, and their potential impact on inshore fisheries. There was strong representation from local community groups and environmental action groups, as well as attendance from the inshore fisheries' representative bodies.

Participants at the workshop stressed the need for community involvement. There was much discussion on the impact that ORE may have on existing business and livelihoods including inshore fisheries and tourism. Participants also called for an environmental focus of decision making, including consideration of an ecosystem-based approach to planning, and including a criterion with an environmental focus for the BAs.

## 1.2 Local community outreach

In addition to the workshops listed above, the consultation team travelled to several coastal locations around the country to conduct informal outreach in coastal communities. During this outreach DECC officials and their consultants spoke with members of the public to raise awareness of the consultation and listen to local viewpoints. Over the course of the consultation, the team visited: Castletownbere and Ballycotton in Co. Cork, Dunmore East, Co. Waterford, Kilmore Quay, Co. Wexford, Dun Laoghaire, Co. Dublin, Balbriggan, Co. Dublin, Sligo, Co. Sligo, Westport, Co. Mayo, Kilrush, Co. Clare and Dingle, Co. Kerry.



**Figure 3 – Local outreach and community engagement**

Feedback in local communities was broadly positive towards ORE, with many stakeholders welcoming the proposed Government-led approach to the identification of areas for development. The team met with members of the public including local fishers, shop keepers, business owners, tourists and tourism providers and coastal residents. The need for consistent and meaningful engagement with communities was stressed, and that continued interaction between the Department and the public would be welcome.

### 1.3 Online events

In order to ensure that as many people as possible had the opportunity to participate in the public consultation, four online information events were held. Three events had a special focus on particular sectors, including the maritime industry, environmental NGO sector and the fisheries sector. A fourth information session was held for the general public.

DECC also hosted an online event for statutory stakeholders which included a focused presentation on the SEA and AA.

All comments and questions received during the online events were noted and included as feedback to the public consultation.

#### 1.3.1 Online Survey

A consultation survey was published online to gather feedback on the draft OREDP II. A total of 316 responses were received. This survey was designed to gather tailored and relevant feedback on key elements of the draft OREDP II. The questions asked in this survey were reflected at the consultation events to help in consistency of feedback.

The survey also gathered some general demographic and occupational information to provide appropriate context to the responses given and gain a level of insight into attitudes towards Offshore Renewable Energy (ORE) around Ireland.

The list of questions asked in the online survey are listed at Appendix D.

### 1.4 Feedback Channels

Feedback to the public consultation was welcomed through a number of channels including:

1. A bespoke draft OREDP II consultation survey, hosted at [www.gov.ie/OffshoreEnergyPlan](http://www.gov.ie/OffshoreEnergyPlan).
2. Consultation workshops and local outreach were held in locations around the country throughout the consultation period.
3. Online events.
4. A dedicated email address: [OffshoreEnergyConsultation@decc.gov.ie](mailto:OffshoreEnergyConsultation@decc.gov.ie).
5. By post to Offshore Environment and Consenting Division, Department of the Environment, Climate and Communications, 29 – 31 Adelaide Road, Dublin 2, D02 X285.

### 1.5 Consultation Promotion

The consultation was advertised extensively in local and national newspapers, along with radio advertisements in both Irish and English. Press releases were also issued to national and regional outlets to generate earned news coverage.

An extensive social media campaign was undertaken, with advertising across Facebook and Instagram, as well as online advertising.

In addition, DECC employed its own social media channels to proactively promote the consultation during the 8-week period via Twitter, Facebook, Instagram, and LinkedIn.

A comprehensive stakeholder mapping exercise was undertaken to identify hundreds of organisations and individual stakeholders to whom the project was of most relevance. This included fishers, ORE developers, local authorities, NGOs, Academics, etc. Details of the consultation and events were shared with these groups via email to encourage participation and inviting them to share the information with their networks.



All Public Participation Network (PPN) offices across the country were also contacted with information on the consultation.

Details of the consultation promotion are included in Appendix C Appendix A.

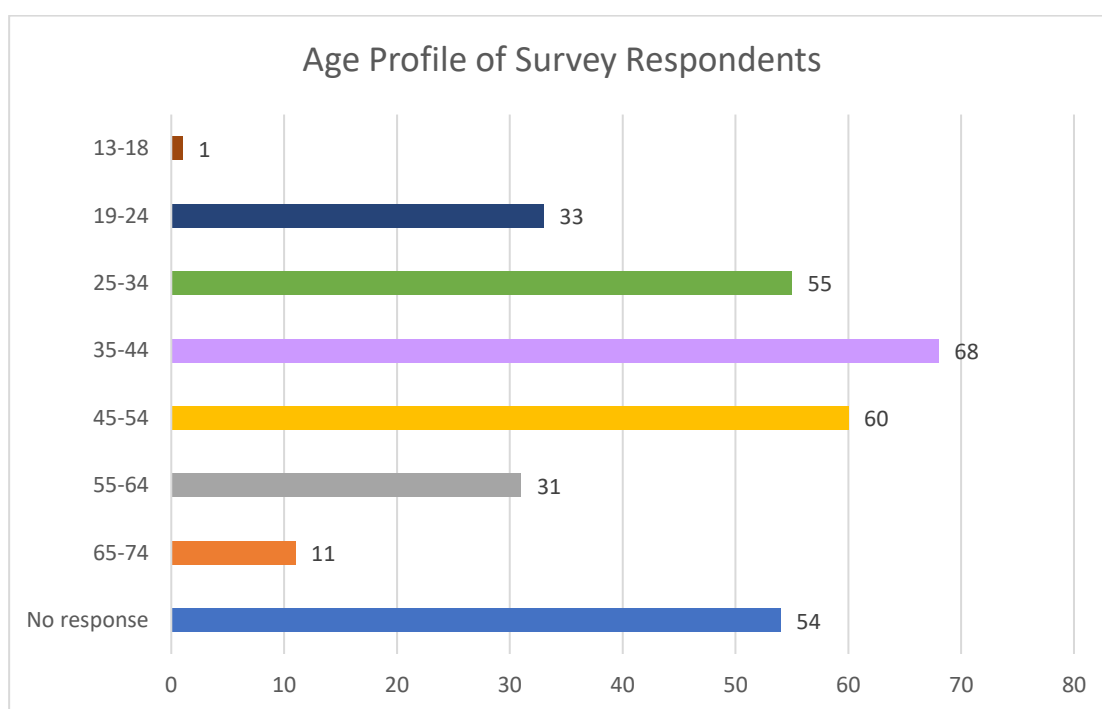
## 1.6 Participation

- A total of 324 people registered to participate in the consultation workshops.
- Across the four online information events held, 344 people registered to attend.
- Responses to the dedicated online survey to gather consultation feedback totalled 313. Organisations who identified themselves in their survey response are listed in Appendix B.
- Submissions received to the consultation email address totalled 116. A list of organisations and elected representatives who made submissions via email is included in Appendix A.

### 1.6.1 Demographic Results of Online Survey

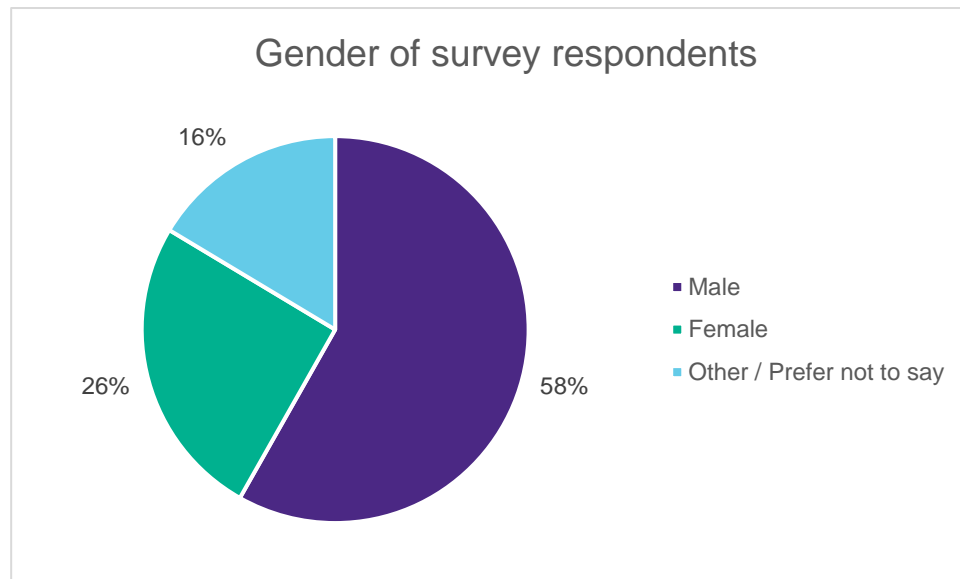
The dedicated online survey also gathered some general demographic and occupational information to provide appropriate context to the responses given and gain a level of insight into attitudes towards Offshore Renewable Energy (ORE) around Ireland.

It should be noted that the following results are based on information gathered through the online survey and is not reflective of all participants in the public consultation.



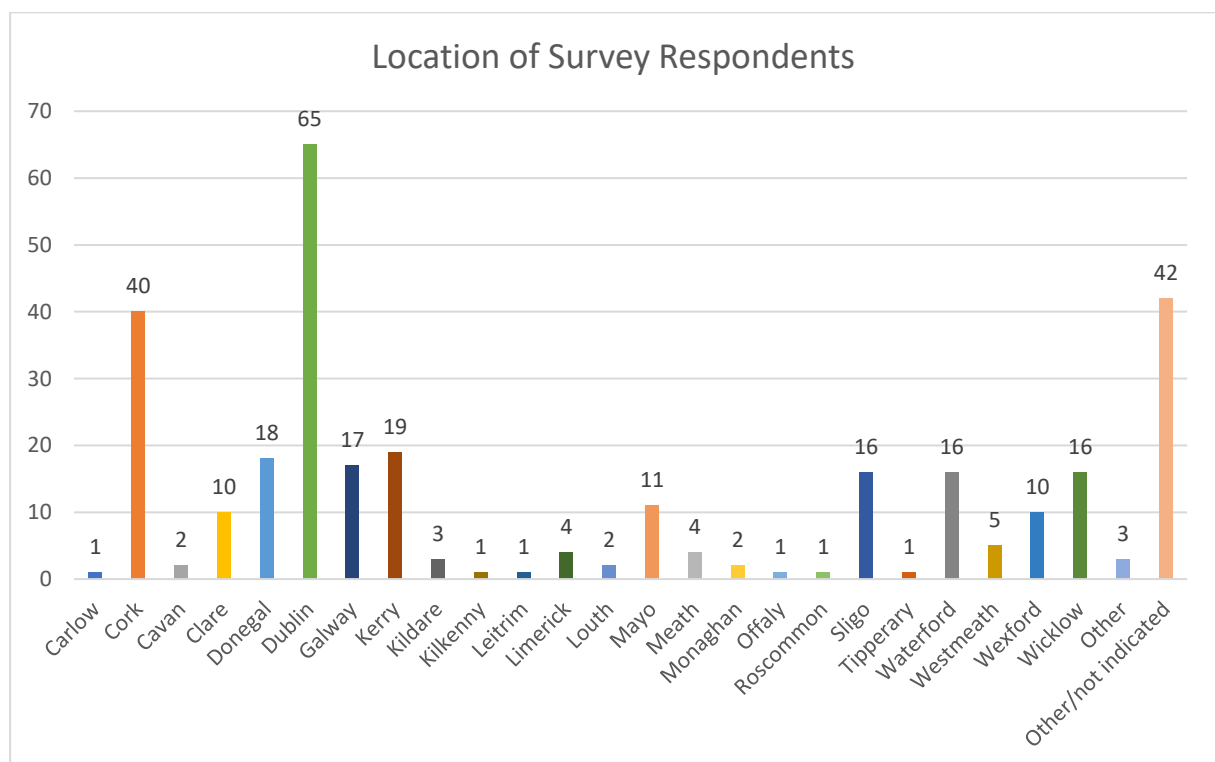
**Figure 4 – Age Profile of Survey Respondents**

The majority of respondents to the survey were aged between 35-44. A significant number of responses were received from the younger age cohort of those aged 25-34.

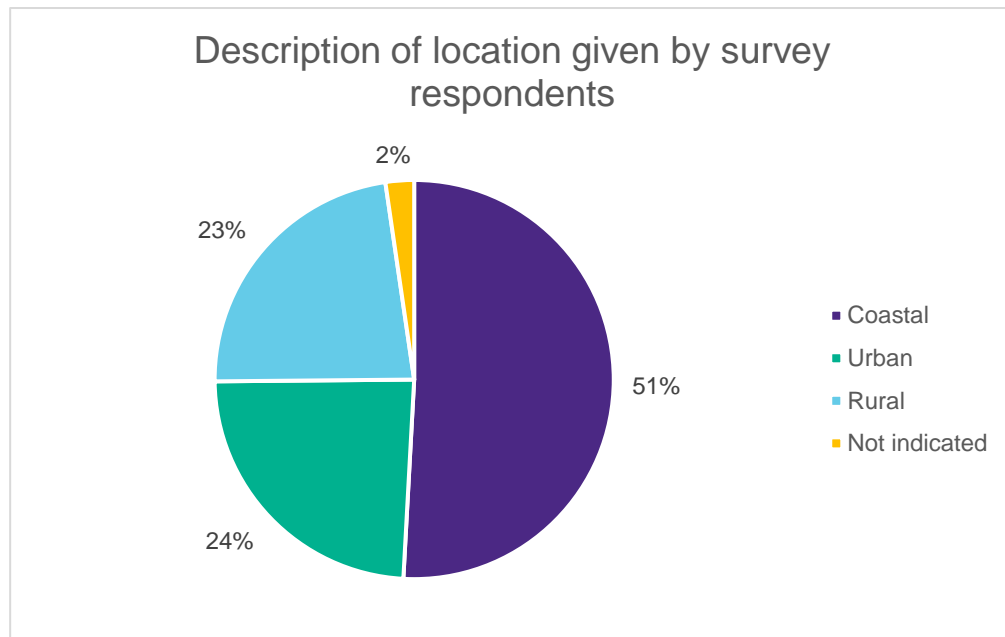


**Figure 5 – Gender of survey respondents**

The majority of respondents to the consultation survey (58%) identified as male, with 26% identifying as female. 16% of respondents did not provide a response to this question.

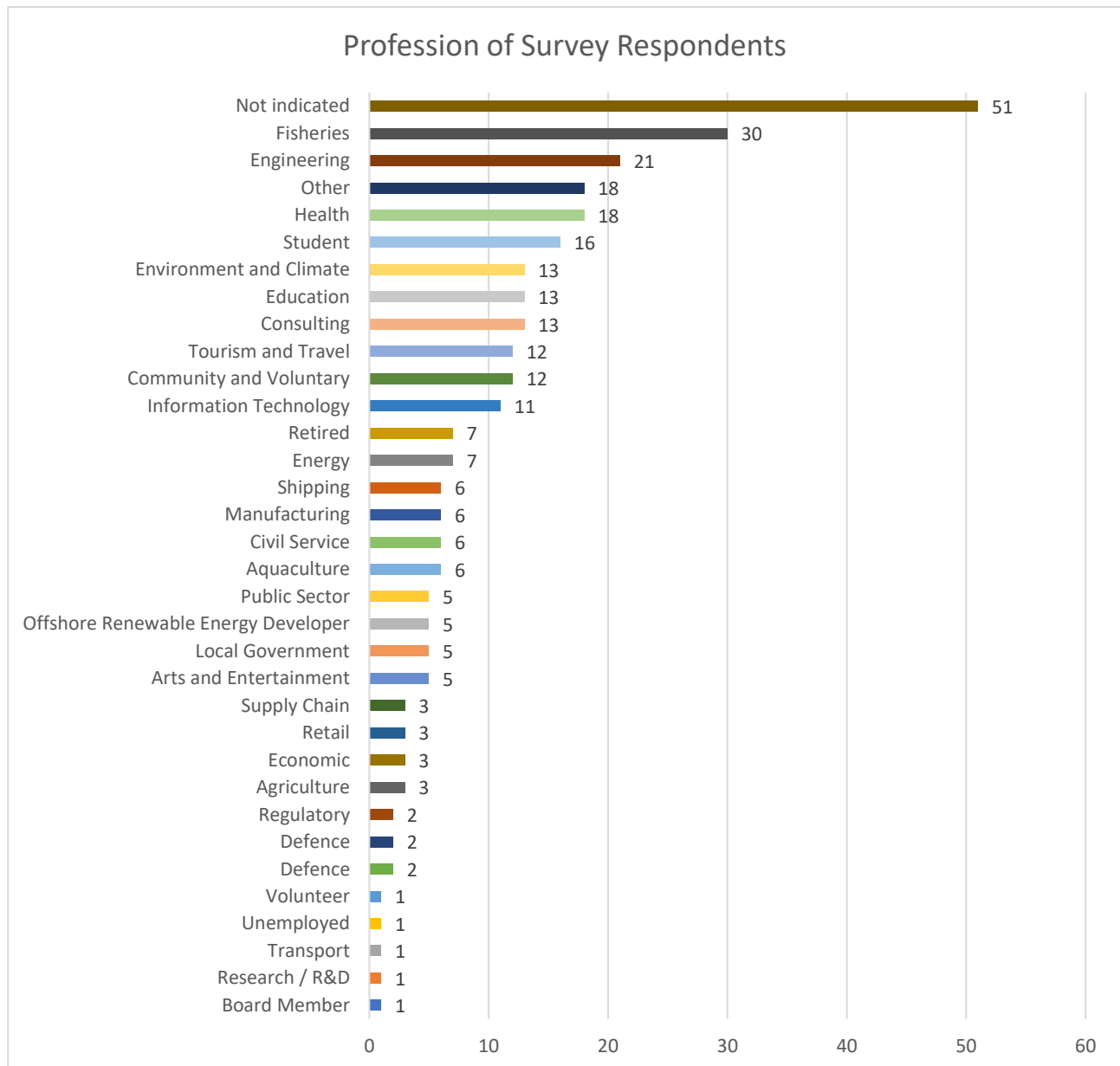


**Figure 6 – Given location of survey respondents**



**Figure 7 – Survey respondents Description of Location**

A significant proportion of responses came from the counties of Dublin and Cork, representing the larger urban centres. A narrow majority of responses (51%) came from respondents in coastal areas, demonstrating the wide geographical relevance of the consultation, with 24% identifying as coming from an urban area, and 23% from a rural area.



**Figure 8 – Response to online survey question regarding sector of consultees**

While a significant number of consultation respondents did not respond to this question, it is clear from the remainder that the survey was responded to by people from across a broad range of sectors. A number of survey responses were received from stakeholders in the fisheries sector, engineering, health care and students.



## 2 ANALYSIS OF FEEDBACK

The following section presents a detailed summary of the feedback received during the focused period of public consultation, i.e., 24 February to 20 April 2023. It includes feedback provided at live and online events, as well as written / email submissions.

Feedback gathered at events and written responses to the consultation have been thematically analysed to identify issues raised. The order in which these themes are presented below does not indicate priority, and all feedback will be considered equally by DECC.

All information included in the following sections is taken directly from stakeholder feedback. It is presented as an amalgamation of feedback from a number of submissions.

This report, together with the individual submissions, will be reviewed by DECC as part of their process to finalise the OREDP II and associated environmental reports. Additional feedback which is not directly related to the finalisation of the OREDP II but is important to future governance and policy development will be referred to the relevant division or Government department.

### 2.1 Opportunities for Offshore Renewable Energy

#### Key feedback on Opportunities for ORE

*Respondents identified a number of potential social, environmental, and economic opportunities that could be supported by ORE development and the OREDP II.*

*Social opportunities identified included community ownership of ORE and supporting coastal, marine and island communities.*

*Action on climate change, protection of the marine environment and development of indigenous green electricity were cited as environmental opportunities.*

*Jobs, diversification of employment, balanced regional development and investment potential were all celebrated as economic opportunities.*

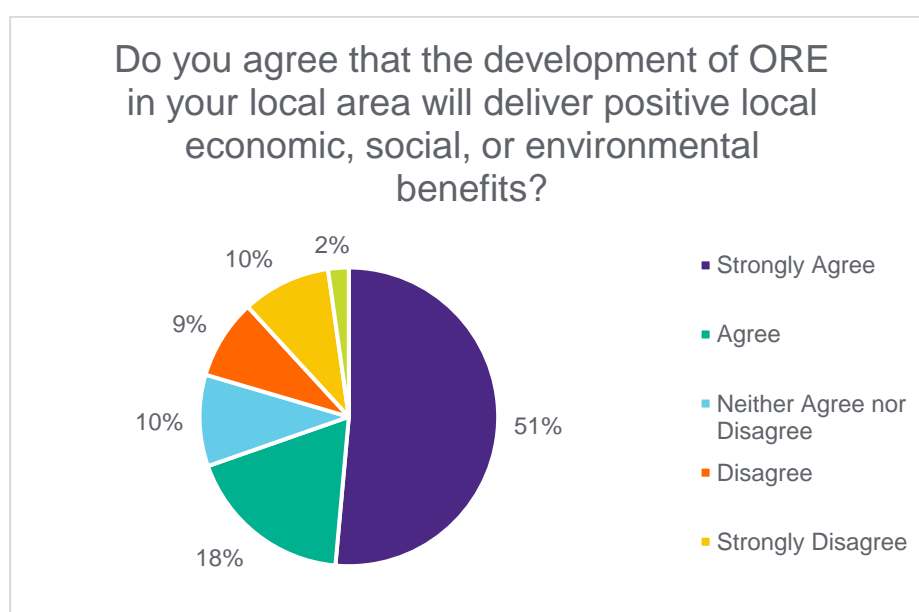
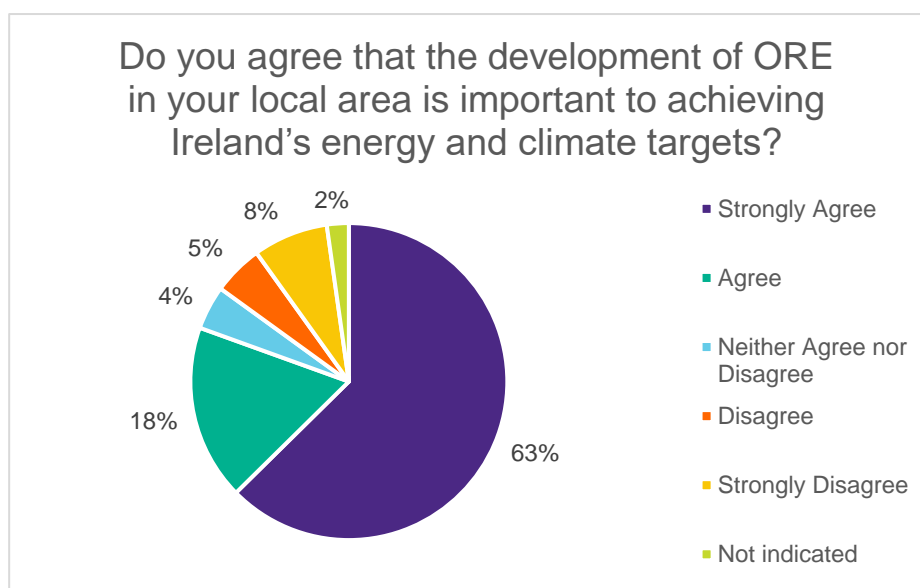


Figure 9 – Response to online survey question regarding local benefits of ORE

69% of respondents said they either agree or strongly agree that the development of ORE in their local area will deliver positive local economic, social, or environmental benefits., with 19% disagreeing with this statement.



**Figure 10 – Response to online survey question regarding ORE contribution to energy / climate targets**

81% of respondents agree or strongly agree that the development of ORE in their local area is important to achieving Ireland's energy and climate targets, with 13% disagreeing or strongly disagreeing.

Many responses were enthusiastic about the opportunities that ORE presents for Ireland in the years ahead. The opportunity Ireland has to develop offshore renewables was described as “unique and powerful”. Examples of some of the opportunities and benefits identified by consultees include:

- Tackling climate change, decarbonising the economy, reducing consumer energy costs, and enhancing energy security.
- Community-led ownership, development, and involvement in ORE projects, which it was said could help to encourage buy in, boost project success, and reduce local opposition to development. The prospect of Community Benefit Funds and the huge impact these could have on communities was also highlighted.
- Fishing vessels and crew providing service support to ORE developments when they are not fishing. It was suggested that this could aid in providing seasonal work and diversifying employment in fishing communities as well as improving acceptance of ORE within the sector.
- Employment opportunities and job growth in the ORE sector, the wider ‘blue economy’ and supporting sectors such as the service, hospitality, and tourism industries, particularly in coastal areas.
- Potential future development of wave, tidal and floating solar renewable energy technology.
- The opportunity to develop a native green hydrogen industry, to aid in decarbonising sectors such as manufacturing and fishing which were cited as suffering from high energy costs, stimulate Foreign Direct Investment, and create a new export market.
- The need for flexible guidance on green hydrogen for Ireland was suggested. It was also stated that ORE projects could be developed that only produce hydrogen / produce hydrogen first, i.e. not just producing hydrogen as a by-product of other ORE generation.
- It was put forward that decommissioned fossil-fuel infrastructure (e.g., for natural gas) could be repurposed for hydrogen storage or transportation.
- It was remarked that the establishment of a “delivery agency” to work with both investors and policy makers would help to deliver on ORE potential.
- Economic opportunities including development of export market for renewable electricity.
- Secondary improvements such as development of grid infrastructure and supply chain for ORE developments supported within Ireland to support scalability.

- The chance for third level institutes to diversify their offering, and pivot away from courses focused on the fossil fuel sector, as well as collaboration on work and study in this area to generate highly skilled and high paying jobs in the sector.
- Economic and social development of coastal and rural areas, including island communities, supporting balanced regional development. Submissions highlighted potential for increased population, more jobs in rural areas and higher investment potential. One respondent even suggested that ORE may play a role in keeping the Irish language alive by boosting Gaeltacht areas.
- The opportunity for ports to become renewable energy hubs and spaces for trade and energy production. More feedback on ports is covered in Section 0 of this report.
- How ORE might share the maritime space with other marine / maritime activities. More feedback on sharing the maritime space is contained in 2.5 of this report.

## 2.2 Challenges facing Offshore Renewable Energy Development

### Key Feedback on challenges facing ORE development

*Despite the positive opportunities identified, respondents also cited some challenges facing the future of ORE in Ireland.*

*These included **environmental challenges, resourcing of state decision-making bodies, investor confidence, public acceptance of ORE, supporting infrastructure, and gaps in the technical expertise needed to make the OREDP II a reality.***

Challenges facing the future development of ORE were also observed in the feedback. These included:

- Concerns about supply chain availability in the years ahead (as Ireland competes with other jurisdictions for ORE development) and the capacity of ports to support ORE development. Submissions on infrastructural requirements are summarised in Section 0.
- Some submissions highlighted potential issues around timing and deployment of ORE infrastructure, and the challenges facing the planning system in processing applications. It was noted this may impact viability of projects and affect investment. It was cited that other regions in Europe are now being assessed as more “secure and predictable from a policy perspective”. The need for the withdrawal of market participants to be avoided at all costs was highlighted in submissions including from ORE developers and Chamber groups.
- The need to consider the fishing sector was repeatedly highlighted as crucial. Members of this fishing community were as cited as the “primary stakeholder[s]” with concerns about the future impact of ORE on livelihoods and traditional industries. It was submitted by some fishers that it may be a challenge to engage with all stakeholders in this group as not everyone has a representative body speaking on their behalf. Offshore survey works in respect of ORE development were flagged as a particular concern for the fishing community.
- Environmental and ecological impacts were widely referenced throughout the feedback. It was claimed that there is not yet enough environmental data to understand the full impact of ORE development and operation. The need to seek a balance between economic and environmental considerations at national and local level was highlighted.
- Reluctance of communities to accept change, poor experiences of stakeholders with onshore wind developments, and social acceptance of projects were flagged by community groups and small scale fisheries groups.
- Perceived inadequate communication between the State, developers, stakeholders, and communities was mentioned as a challenge facing the future development of ORE.
- Housing policy and population growth challenges were put forward as factors also facing the ORE sector. This included the challenge of employees finding housing in Ireland and issues with securing planning permission in rural areas for homes.

- The challenge of preparing and upgrading the national grid to distribute the additional energy generated by offshore wind.
- Some stakeholders cited a fear that projects will be delayed and abandoned if Ireland “once again allows vital ORE projects to get tied up in the courts” by a minority of objectors or “some fishers looking for too much compensation”.
- It was suggested that security for ORE infrastructure is often overlooked, and the future role of the naval service in defending infrastructure needs to be considered. The impact of ORE on the ability to secure and patrol the maritime space was also referenced, with the Department of Defence submitting their wish to be consulted with as part of the OREDP II process.
- A submission from Met Éireann cited the impact that wind turbines can have on weather forecasts through interference with radars. It was asserted that “Developers should consult with Met Éireann at pre-application stage to ensure that any interference with current or approved weather radar installations can be mitigated”. The Irish Chartered Skippers Association also queried the impact on radar, which they note as a “huge aid to navigation”.
- Environmental challenges particularly off the west coast, such as high winds and waves were highlighted. These conditions were perceived by some as having the potential to impact construction and Operations and Maintenance (O&M) of potential future developments.
- ORE developers and others cited a key challenge being lack of belief in Government to deliver on planned targets, as well as uncertainty around ORE policy in Ireland which is leading to uncertainty amongst the industry and their investors. The need for a ‘fit for purpose’ regulatory environment was included in submissions.
- The need for new interconnectors to meet export potential was submitted as a possible challenge.
- Skills gaps in the sector were highlighted as a potential obstacle to development and are outlined further in Section 2.11.
- Challenges facing maritime users examining plans to share and allow multiple activities in the maritime spaces are outlined in Section 2.5

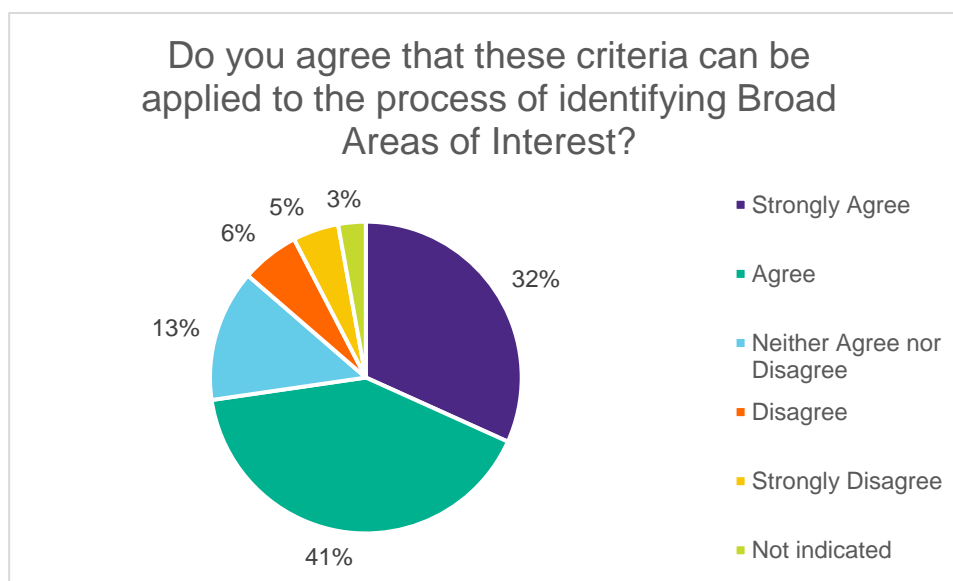
## 2.3 Criteria for selecting Broad Areas of Interest

### Key Feedback on the Criteria for Selecting Broad Areas of Interest

*Most feedback related to the criteria for **potential for floating wind and bathymetry**, with many submissions asserting that these should be re-examined to allow **more flexibility for developers**.*

*The main feedback suggested that BAIs should **not be limited to FLOW**, and that the **proposed water-depths** for BAIs are **not suitable**. However, it was also suggested that the **higher costs of development and deployment in deeper waters** should be a **consideration**.*

*Significant feedback was also received in respect of the indicative Broad Areas of Interest which were included in the draft OREDP II including feedback on **the indicative locations, size, and decision-making process** behind the identification of these areas.*



**Figure 11 – Response to online survey question regarding criteria for selecting Broad Areas of Interest**

73% of respondents stated that they either agree or strongly agree that the proposed criteria can be applied to the process of identifying Broad Areas of Interest. 13% of survey respondents neither agree nor disagree with the statement. A significant amount of feedback was received on the criteria for selecting the BAIs. Responses included suggestions for changes or additions to the criteria. In responses to the online consultation survey, 73% of respondents agreed or strongly agreed that the criteria identified could be applied to identifying BAIs.

It was suggested that the OREDP II should outline the process that was undertaken to choose the proposed criteria, and greater explanation should be included on how the indicative BAIs in the draft plan were chosen.

A significant amount of feedback was received from ORE developers in relation to the criteria, including a submission from Wind Energy Ireland, the representative body for offshore wind energy developers. While submissions from developers were broadly aligned in terms of their views on the criteria, individual developers focused their feedback on the criteria based on the type of technology and locations for projects they propose to deploy in future (e.g., FLOW vs fixed bottom wind turbines). There was a particular focus on the proposed water-depth for fixed and floating wind from developers.

Table 1 below outlines the criteria set out in the draft OREDP II, and the feedback received on each.

**Table 1 – Feedback related to proposed criteria to identify Broad Areas of Interest**

Criteria	Feedback Received
<b>Wind resource potential for floating wind</b>	<p>Some stakeholders disagreed with the specification of floating offshore wind (FLOW) in the criteria. A summary of the feedback received on this criterion is listed below:</p> <ul style="list-style-type: none"> <li>Several stakeholders including Engineers Ireland submitted that BAIs should be “technologically agnostic”, and the criteria should not limit future development to FLOW.</li> <li>Some submissions disagreed with the assertion that the areas only be for future FLOW development and that fixed bottom projects should still be considered as part of the Future Framework beyond 2030.</li> <li>That a more open approach be considered to allow for the development of wave and tidal technology alongside offshore wind.</li> </ul>

	<ul style="list-style-type: none"> <li>• A submission from Clare County Council asserted that many FLOW projects are in the 60-100m scale are still only at demonstration stage and that the OREDP II is excluding a larger resource outside this depth.</li> <li>• That wind speeds offshore are “broadly uniform” around the South and West coasts, negating the need for this criterion.</li> <li>• That an area’s individual specification should determine the most appropriate technology to be used rather than limiting to FLOW.</li> <li>• That BAIs should allow for mixed development, e.g., fixed and FLOW in the same area, or wave energy infrastructure in the same areas as wind turbines.</li> <li>• That the criteria should be kept flexible, and consider the latest technology, not limiting a BAI to a specific technology type.</li> <li>• The potential impact of this criterion on the future development of wave and tidal technology was also cited.</li> <li>• That the criteria make no provision for “the deployment of experimental and demonstration wave and tidal devices” and that this may limit the development of these technologies.</li> </ul>
<b>Bathymetry potential for floating wind (60m to 100m water-depth)</b>	<p>The water depths proposed in the draft OREDP II criteria were the key issue for many stakeholders, primarily ORE developers, inshore fishers, as well as some Chambers and eNGOs. The feedback received on this criterion included:</p> <ul style="list-style-type: none"> <li>• That the proposed depths are not realistic for future FLOW development, which it is claimed could be deployed up to 1,000m and require deeper waters. Respondents suggested that the proposed depths were too shallow for moorings / anchorage for FLOW developments.</li> <li>• It was also submitted that the higher costs and safety implications of developing ORE in deeper waters should also be considered.</li> <li>• It was submitted by many ORE developers and Wind Energy Ireland that limiting FLOW to less than 100m may present design challenges and lead to higher life-cycle costs, and that the shallower depths may result in lower power outputs and less efficient units. It was said by one developer and the MRIA that up to 200m should be considered as it is claimed commercial FLOW is now feasible up to this depth. Several stakeholders including ESB Generation, Killybegs Fishermen’s Organisation and the Atlantic Economic Corridor all called for a revision of this criteria to consider water depths up to 200m.</li> <li>• It was argued that fixed-bottom developments can now be deployed at depths greater than 60m and the criteria should not limit technology to FLOW. Several ORE developers cited their concern with this criterion and the impact it may have on future fixed bottom development. For example <ul style="list-style-type: none"> <li>○ EDF Energy noted the continuous development of technology means that some companies are developing fixed bottom infrastructure at depths of &gt;85m.</li> <li>○ Fexco asserted that at depths up to 80m the developer could determine whether fixed or floating is best.</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>○ Inis Offshore Wind noted that fixed is techno-economically feasible up to 80m and potentially beyond.</li> <li>○ Mainstream suggested examining depths of up to 90m for fixed.</li> <li>○ SSE suggested that the potential for future fixed bottom technology is now being examined at depths of up to 100m.</li> <li>• ORE developers suggested that projects and the technology they intend to deploy should inform the chosen depths rather than being restricted by criteria.</li> <li>• There was concern from the Marine Renewable Industry Association that the criteria are based on a “misunderstanding” of FLOW technology or on “outdated” information and reflective of older technology types, and that the criteria as written may limit FLOW development rather than support it.</li> <li>• Wind Energy Ireland suggested that the focus on water depth is “overly simplistic” and does not take account of other technical considerations such as seabed type, depth to bedrock and metocean conditions.</li> <li>• It was queried whether it is appropriate to apply a depth restriction at this stage when the technology is likely to change into the future.</li> <li>• That the proposed depths may “knock out” a lot of projects that are already at some stage of development, and that this criterion might limit Ireland’s ability to develop ORE at a competitive price. ORE developers including Simply Blue Group have suggested that there seems to have been “limited efforts” to align with projects currently in the “development pipeline”.</li> <li>• That co-location of ORE with other activities would be more difficult at the lower water depths such as 60m. Concern was expressed that shallower depths proposed may put more pressure on the inshore fishing sector and increase the visual impact from shore.</li> </ul>
<b>Availability of localised datasets</b>	<ul style="list-style-type: none"> <li>• It has been suggested by respondents including Fred Olsen Seawind and Údarás na Gaeltachta that the availability of localised datasets should not restrict development, given the extent of data gaps.</li> <li>• Respondents including Limerick Chamber cited that it is not clear how this criterion was or will be applied in identifying BAIs and what methodology was used regarding localised datasets. It should be made clear whether project level or commercially owned data will be used.</li> <li>• As there are vast differences across the maritime space, it was said by the Irish Wildlife Trust that regional / local datasets should be used at the early stages to “avoid wasting time considering areas that are not environmentally suitable”.</li> <li>• Environmental consultants suggested rather than excluding areas based on lack of localised data, DECC could seek to acquire missing data. In their submission, Green Rebel advocated a “public-private partnership with an Irish marine surveying company, which could help speed up the data acquisition process”.</li> <li>• Concern that areas with a greater quantity of local level data may be developed ahead of areas which are more suitable for ORE but have less data available.</li> </ul>

	<ul style="list-style-type: none"> <li>Fisheries stakeholders including the North Regional Inshore Fisheries Forum cited concern that a lack of fisheries data may lead to misunderstanding of the level of activity in an area. They suggested that this may lead to undue impact on the fisheries sector. It was remarked that including potentially important fishing areas in BAIs on the grounds of unknown data is unacceptable to the fishing community.</li> <li>That in identifying BAIs, research requirements should also be considered to address data gaps identified.</li> <li>It was submitted that the OREDP II should specify how local data imbalances will be addressed (a roadmap for how data will be gathered) in order to avoid the criterion becoming an issue.</li> <li>That a strategic approach from DECC and the Department of Housing, Local Government and Heritage (DHLGH) should be developed to inform SEA / AA processes with site-specific data.</li> <li>That local knowledge should be used, supported, or reinforced by scientific evidence to build the OREDP II evidence base. It was said that fisheries knowledge should also be included in this.</li> <li>That data availability should not impede the achievement of climate and energy targets.</li> </ul>
<b>Onshore infrastructure</b>	<p>Respondents generally accepted this criterion as appropriate, however more clarity was requested on how this criterion will be applied (e.g., what activities are included and if it will consider existing or future infrastructure).</p> <p>Feedback on this criterion included:</p> <p><b>Ports</b></p> <ul style="list-style-type: none"> <li>That as written, the criterion downplays the essential role of onshore considerations in the viability of ORE. A submission from Limerick City and County Council suggested that the OREDP II needs to recognise the need for “sustainable growth in port capacity in achieving ORE targets”.</li> <li>It was submitted that the criterion may be too restrictive, for example, limiting development to locations near industrial ports, and that there are currently no ports in the Republic of Ireland that are suitable without investment. Suggestions were received in respect of also considering smaller ports which could support operations and maintenance activities.</li> <li>That the criterion should consider the function, capacity, and character of existing ports, which were cited as “varying considerably”.</li> <li>That this criterion should consider proximity of suitable ports for FLOW, e.g., consideration of towing ranges to bring components to site. It was suggested by Simply Blue that sites should be located within a 24-hour towing distance from a port suitable for FLOW. Quick access for vessels was also mentioned as a key consideration.</li> </ul> <p><b>Grid / Power Storage</b></p>



	<ul style="list-style-type: none"> <li>The need to specifically reference grid infrastructure in the criteria was flagged by respondents, with connection to the national grid described as “key” by stakeholders including Energia. However, other submissions asserted that grid infrastructure should not dictate the locations of future development, with some seeing it as an “aged constraint”.</li> <li>That enabling infrastructure (cable routes / landfall points / offshore substations) should be considered as part of the OREDP II, the BAI criteria, and the associated environmental reports. Consideration of where power can be stored onshore from the ORE developments was also suggested.</li> </ul> <p><b>Ancillary Infrastructure</b></p> <ul style="list-style-type: none"> <li>The need to consider other local infrastructure such as the road network in identifying BAIs was also submitted, including by stakeholders at the Ros a Mhíl and Dundalk workshops with suggestions that “a proper road network” is essential to the transport of materials and people [for ORE developments] to these areas.</li> <li>Feedback at the Dundalk workshop cited the area’s proximity to both Dublin and Belfast and their ports; local ports in Drogheda, Dundalk and Greenore; and grid interconnections with Wales (existing) and Northern Ireland (planned) as being positive factors for location of ORE developments.</li> <li>As well as physical infrastructure, a number of suggestions were received in respect of ‘soft’ infrastructure, including proximity to industry knowledge and expertise to manage the operation, maintenance, security, and safety of a development. It was also considered that proximity to centres of training and excellence be included.</li> </ul>
<b>Industrial opportunities</b>	<ul style="list-style-type: none"> <li>The local supply chain be given consideration as part of this criterion.</li> <li>Existing industry should be considered ahead of future opportunities.</li> <li>Proximity to industry should not be a limiting factor in selecting BAIs, and that instead of picking areas based on economic reasons, investments should contribute to the economy in the places that need it.</li> <li>That this criterion should extend beyond green hydrogen opportunities.</li> <li>The potential future of hydrogen and its role in supporting industry was flagged as requiring consideration under this criterion.</li> </ul>
<b>Demand centre proximity</b>	<p>Many respondents including ORE developers agreed with the need to include this criterion. Comments related the proximity to demand centres as a criterion included:</p> <ul style="list-style-type: none"> <li>Choosing to locate BAIs near strong population centres will provide benefits for communities.</li> <li>Participants at the workshop in Ros a Mhíl cited concern that this criterion may “leave areas that are already economically weak weaker”, such as areas which may have lower populations or industry levels, “and stronger areas stronger” for future ORE development.</li> </ul>

	<ul style="list-style-type: none"> <li>• The Industrial Development Authority, through their participation at consultation workshops, referenced the relationship between industrial need for electricity and location of ORE.</li> <li>• That if too much emphasis is placed on the demand centre criterion that jobs will go to where there is already demand rather than developing other parts of the country.</li> <li>• That sometimes the best / most suitable areas for wind / wave / tidal power generation (e.g., best wind speeds) do not necessarily correlate with centres for demand.</li> <li>• That basing the selection of BAIs on existing demand may be short-sighted, and that demand centres should be identified and planned for early.</li> <li>• That incentivising energy intensive industry like datacentres to locate near ORE generation would help to create efficient use of energy.</li> <li>• That this criterion should be strengthened to support justification for investing in grid infrastructure.</li> </ul>
<b>Interconnectors</b>	<p>Many submissions agreed with the need to consider interconnectors and connection points as part of the criteria. Feedback received included:</p> <ul style="list-style-type: none"> <li>• That this criterion is currently only relevant for projects off the South coast.</li> <li>• Interconnectors were cited as essential for a “route to market”.</li> <li>• The need for a European interconnector was cited.</li> <li>• That proximity to interconnectors should not determine the location of an ORE site. That this criterion may not bear as much relevance to sites earmarked for green hydrogen production.</li> <li>• That priority should be given to enhancing the national grid and that this would allow access to interconnectors in any part of the country rather than in proximity to ORE sites.</li> <li>• The OREDP II should consider potential for interaction with other jurisdictions specifically in relation to export of electricity.</li> <li>• One submission suggested that there is an “international component” missing from the criteria. It was said there should be less focus on local demand, and a greater emphasis on expanding clean energy globally as part of Ireland's role in the decarbonisation of other countries. However, it was also questioned how much potential there is to export, given that other countries are also moving to develop their ORE markets.</li> </ul>

### 2.3.1 Other Feedback on BAI Selection Criteria

- That the criteria should be used as a “starting point” for DMAPs rather than excluding areas from future ORE development.
- Some concern that the criteria in the draft OREDP II are not specific enough and that there should be a greater level of detail provided.

- That the criteria do not reference economic goals or strategic outcomes.
- Chambers Ireland in their submission expressed said in regard to uncertainty around the criteria that “this is likely to be a problem in the longer term should the Department, or agencies, rely on this designation to refuse permitting in viable areas.” They go on to say that for “administrative processes like this to be able to sustain scrutiny in the courts they need to be both reasonable and rational, and should the decision-making process be undermined by inadequate or inappropriate assumptions or data then it is likely that State bodies will struggle to defend the stance that has been taken.”
- That by restricting areas using BAIs, Ireland risks not allowing DMAPs to maximise ORE potential and missing climate and energy targets.
- Suggestions included that the OREDP II should apply a clear weighting to the criteria.
- Respondents, including the Environmental Protection Agency, queried the extent to which environmental constraints were considered in choosing BAIs and asked that it be set out more clearly in the OREDP II. It was also proposed that there should be a greater emphasis on environmental assessments and that MPAs will need to be considered once they are identified.
- It was submitted that in the event that an ORE development has a detrimental effect on the environment, the OREDP II should specify the responsible party for the restoration of the area.
- It was suggested that fisheries, and the potential impact on fishing communities, be considered as a criterion with the aim of minimising impact on the sector. It was also suggested that offshore fisheries (which include many international fishers) should be considered as a criterion if FLOW is examined further offshore, as it has the potential to impact this sector.
- That low-resolution datasets are not appropriate for use in site selection and should instead be used to guide future survey work
- Stakeholders including the North-West Regional Assembly suggested that the BAIs will need to be considered in the context of land-sea interface, requiring an integrated approach with terrestrial planning and this should be reflected in the criteria. It was submitted that the BAIs should consider onshore environments required for developments (e.g., trenching / cabling and areas these might pass through) as well as seabed conditions and differing seabed topography.
- Some respondents including Simply Blue Group and Blue Horizon said that the distance from shore should be included as a criterion to mitigate visual impact, reduce impact on inshore fisheries and take account of ecological considerations. It was remarked that a minimum distance from shore for the BAIs be set out, with suggestions from 12 nautical miles (22km) up to a minimum of 35km suggested by stakeholders in Killybegs.
- That the BAI criteria should consider the distance needed to transport electricity to shore.
- That the criteria could be expanded to make specific reference to gas transmission infrastructure with potential for repurposing for hydrogen.
- Addition of security and defence considerations as a criterion.
- That the criteria should consider aligning BAIs with sites already in development or under consideration. It was remarked that DECC should work with the ORE sector to understand their methods of site selection to help inform the criteria.
- That the criteria for selecting BAIs should take account of the need for balanced regional development.
- Inclusion of cost-benefit analysis as part of the criteria, and viability of development in an area.
- Consideration of communities and existing community energy projects and proposals.
- Development of a broader range of criteria to fit a broader range of technologies.
- Including “site accessibility indicators” such as wave height and weather windows for construction and maintenance.
- The total capacity that the BAIs are targeting was suggested as being unclear and should be included in the OREDP II.
- The addition of a criterion to consider public opinion / approval or “Social Licence” to operate.

### 2.3.2 Multiple Criteria Analysis

In addition to feedback related to the criteria for identifying BAIs, commentary was also received in respect of the Multiple Criteria Analysis (MCA) that was carried out by the Department as part of the identification of areas suitable for ORE development. There were some misgivings that there was not enough appropriate data considered to inform the BAIs, and that a clear explanation of the methodology used is needed.

Many of the comments reiterated the need to consider the datasets that the Department had already factored in, such as environmental, heritage and exclusion zones (e.g., undersea cables and shipping lanes).

However, it was submitted that some of the environmental datasets included appear “contrary to the criteria on grounds of temporal relevance”, and that the statement in the OREDP II that “*The factors mapped do not pre-empt decisions on licence or consent applications for ORE*” can be seen to “undermine the whole OREDP II purpose”. It was also suggested that the resource models for wave and tidal have a number of issues, including assuming specific technologies, using low resolution models, and failures to validate models against measured data.

It was also suggested that the exclusion of onshore data apart from UNESCO sites is “short-sighted” as ORE development is dependent on a number of onshore factors.

It was said that the exclusion of project-level data from the MCA means it is not clear how the ORE sector has been considered.

Submissions including from Codling Wind Park remarked that the OREDP II should provide clarity on the hierarchy and providence of data used. Some criticism was received with regard to the data used to inform the draft OREDP II, with suggestions that a precautionary approach should be taken, and that where data is available it should be included unless it is preceded by more up-to-date or higher quality data. Submissions highlighted the large amount of data omitted from the OREDP II and remarked that a clear justification for the exclusion of data should be available for all data sets.

It was suggested by many workshop participants that DECC should consider an approach similar to the Crown Estate in the UK and use heat mapping to identify suitable areas. Some concern was expressed that the OREDP II has not given enough consideration to transboundary data. There were also concerns that the BAIs have been largely based on desktop work rather than actual surveys with the data used.

Suggestions were also received in relation other factors that the Department might consider as part of this analysis, including:

**Table 2 – Suggested information for inclusion in MCA**

<b>Economic Model</b>	<ul style="list-style-type: none"> <li>• That greater weighting should be applied to fisheries data. It was suggested that fishing intensity maps only tell some of the story and do not adequately represent the economic value of fisheries such as supporting industries (net-makers, provisions etc.).</li> <li>• That there is a significant gap in fisheries data.</li> <li>• Fishing data – including historic and important spawning and nursing grounds, shellfish grounds and cetaceans – should be included in BAI identification.</li> <li>• Aquaculture output.</li> <li>• Tourism such as popular tourist routes, cruise ship routes, etc.</li> <li>• Socio-economic data including housing trends, average wage, population density, employment etc.</li> <li>• It was suggested that DECC use census data to develop a baseline to inform the criteria.</li> </ul>
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	<ul style="list-style-type: none"> <li>In their submission, Fuinneamh Sceirde Teo suggested shipping densities of less than 400 hours should be ignored for the purposes of this assessment.</li> </ul>
<b>Environmental Factors</b>	<ul style="list-style-type: none"> <li>New Special Areas of Conservation (SAC) designated since 2022.</li> <li>Migratory paths for birds.</li> <li>Seismic survey data.</li> <li>Consideration of coastal morphology and sediment transport.</li> <li>Consideration of emissions associated with ORE material production, transport, and maintenance.</li> <li>It was suggested by organisations including Coastal Concern Alliance, Wicklow Wildlife Welfare and Fair Seas Ireland that MPA areas identified by Fair Seas should be included.</li> <li>Submissions, including one from Údarás na Gaeltachta, suggested that there are inconsistencies in how the buffer zones were applied and BAIs fail to adequately mitigate adverse impacts.</li> </ul>
<b>Exclusions</b>	<ul style="list-style-type: none"> <li>Emergency route response corridors.</li> <li>Defence considerations.</li> <li>That aquaculture be reconsidered as an activity in the exclusions model.</li> </ul>
<b>Heritage Model</b>	<ul style="list-style-type: none"> <li>Significant areas of culture.</li> <li>One submission suggested that the proposed buffer around heritage sites does not provide additional value, and that ORE developments should locate at least 35-40km away from sensitive sites.</li> <li>It was submitted that maritime culture and heritage on offshore islands has been recognised by UNESCO and should be considered.</li> </ul>
<b>Technical Opportunities</b>	<ul style="list-style-type: none"> <li>Seabed characteristics / substrate (for consideration of substrate for moorings).</li> <li>More accurate wave and tidal models.</li> </ul>

### 2.3.3 Indicative Broad Areas of Interest

- As part of the draft OREDP II, the Department applied its proposed criteria and presented three indicative BAIs as a way of demonstrating the areas that might be identified when the criteria are applied. The maps presented in the draft OREDP II elicited a significant amount of feedback from consultees. There was feedback from multiple stakeholders advocating for a BAI to be identified for their project area. This included ORE developers, local chambers, community energy co-ops and port authorities.

Feedback on the BAIs as presented is summarised in Table 3 below, included:

**Table 3 – Comments on indicative Broad Areas of Interest**

Area	Comments
<b>Celtic Sea BAI</b>	<ul style="list-style-type: none"> <li>• That the area is suitable for further investigation, citing a wide range of infrastructural and industry supports available in County Cork including port facilities, expertise and research facilities and grid connections.</li> <li>• Welcomed by some developers who have sites identified within the BAI as well as other stakeholders who welcome the economic opportunities presented. It was suggested that this area be expanded further eastward.</li> <li>• That the whole of the BAI covers prime fishing grounds including scallop fisheries.</li> <li>• That the model is not fit for purpose and appears to be “forcing areas” in the Celtic Sea despite fishing activity data and does not reflect the economic value of fishing for coastal areas here.</li> <li>• That the area off the coast of Cork may not be the best location when considering the intensity of fishing compared to other coastal counties.</li> <li>• Clarity was requested on whether Phase 2 DMAPs will be contained within this BAI or if it is possible for them to lie outside of the BAI boundary.</li> <li>• Coastwatch Ireland said that this is the area of most concern from a biodiversity perspective with migratory and other species in the area.</li> </ul>
<b>Mid-West BAI</b>	<ul style="list-style-type: none"> <li>• Several stakeholders including attendees at the Foynes workshop suggested that the BAI is much smaller than the other indicative BAIs, thus limiting the potential of the area. It was also submitted by respondents that the area was too shallow.</li> <li>• Area is welcomed in terms of its proximity to existing grid infrastructure.</li> <li>• That the BAI does not take into consideration areas that are being examined for ORE development off the West Coast.</li> <li>• That the BAI underestimates the potential of the Shannon-Foynes area to become a future hub for development.</li> <li>• That the depths represented by the BAI will be restrictive to future FLOW development.</li> <li>• Dissatisfaction that the BAI is located with its boundary close to the Cliffs of Moher with concern that significant viewpoints may be affected.</li> <li>• Concern from several stakeholders including Mayo County Council and SEAI Sustainable Energy Communities that the sea off Galway and Mayo are not included at this stage, that “the wind blows there too” and that the OREDP II has “ignored” Galway’s large industrial port.</li> </ul>
<b>North-West BAI</b>	<ul style="list-style-type: none"> <li>• Many comments received suggested that according to the existing criteria, the north-west coast is not appropriate to select as a BAI.</li> <li>• Attendees at the Killybegs consultation workshop asserted that a BAI off Donegal would be transformative to the community, encourage green industry, support</li> </ul>

	<p>decarbonisation of the fishing fleet, and diversify employment opportunities. Local attendees stressed that work must be done to ensure this area is retained in the BAIs selected.</p> <ul style="list-style-type: none"> <li>• Concern was expressed at the Killybegs workshop that Donegal does not have an industrial port, grid, or nearby industry to satisfy the BAI criteria as set out in the Draft OREDP II.</li> <li>• It was said that the proposed area covers “prime fishing grounds”, but much of the fishing (e.g., Malin Head crab fishery) is carried out by vessels less than 15 metres in length resulting in little VMS data to show the footprint. This concern is reflected for other areas around the North West coastline.</li> </ul>
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### 2.3.4 Additional Feedback on BAIs

#### 2.3.4.1 Maps

- ORE industry was not expecting maps to be presented at this stage of public consultation on the OREDP II. It was remarked that if the BAIs are intended as indicative, they should not have formed the basis of formal environmental assessments.
- That the scale of the maps presented in the draft OREDP II does not adequately illustrate the difference in size between the three indicative BAIs.
- Concern that the maps are “biasing public opinion” by “inflating perceived coastal impacts” in areas unsuitable for development. It was suggested that the maps be removed from the final OREDP II document.
- That it would be useful to have online GIS resources to better understand the BAIs.

#### 2.3.4.2 Process of developing / identifying BAIs

- Requests for further consultation on the BAIs before finalising the locations.
- That there is a disconnect between the criteria and the indicative areas presented and that it is not clear what the “purpose and intention” of the BAIs identified is.
- That the boundaries of the initial BAIs do not take account of other nearby areas that satisfy the criteria.
- Questions on whether there is scope to develop outside the BAIs.
- That greater clarity is needed on what will be involved in the further spatial analysis.
- That the “formality of the status” of BAIs should be set out in the context of marine planning.
- That the BAIs are too small to achieve the targets of the Future Framework (only representing 4-5% of the EEZ) and reflect a “lack of ambition”. There is a view that the BAI boundaries should be extended for greater opportunity to identify viable DMAPs.
- That if the draft OREDP II considered current and emerging technologies that the areas would be much larger.
- It was queried whether a fishing industry value would be assigned to an area to mitigate the costs to the sector.
- It was suggested by the EPA that a clear description should be provided of how environmental factors were considered in defining the indicative BAIs. Coastwatch submitted that environmental data should be included at this stage, and that leaving it until the DMAP SEA stage is too late.
- That the draft OREDP II identifying BAIs “precludes local opportunism”.
- That the BAIs are too close to the shore, and they should start further out.
- Some of the BAIs cover important fishing and spawning grounds.



- That these areas should be available for development before 2030.

### 2.3.4.3 Locations

- That the mid-west and Celtic Sea BAIs should be prioritised for the development of DMAPs.
- Feedback from stakeholders including the Eastern and Midland Regional Assembly suggested that DECC should clearly outline the process of how the indicative BAI boundaries in the draft OREDP II were decided (i.e., how the criteria were applied) and justification provided for the boundaries proposed.
- That the exclusion of the East Coast as an initial BAI is a missed opportunity for fixed and floating wind, with greater population levels, infrastructure, and more favourable conditions.
- That areas off West Cork and Kerry should be considered. Strong representation was received from Valentia Island stakeholders (including Valentia Island Energy Ltd. And Valentia Island Development Company) advocating the inclusion of their area in the BAIs. Their responses were supported by political representatives including Sean Kelly MEP and Commissioner Mairead McGuinness.
- That the coast off Co. Mayo and Co. Galway should be considered. One submission cited the “promising results” of the Atlantic Marine Energy Test Site in Belmullet as something to be considered in support of this area, and others saying that “on the face of it” the area should meet several of the BAI criteria. It was suggested by Claremorris Energy Co-op that grid infrastructure should not be a limiting factor in choosing these areas.

## 2.4 Attitudes to the plan-led approach / Future Framework

### Key Feedback on the plan-led approach

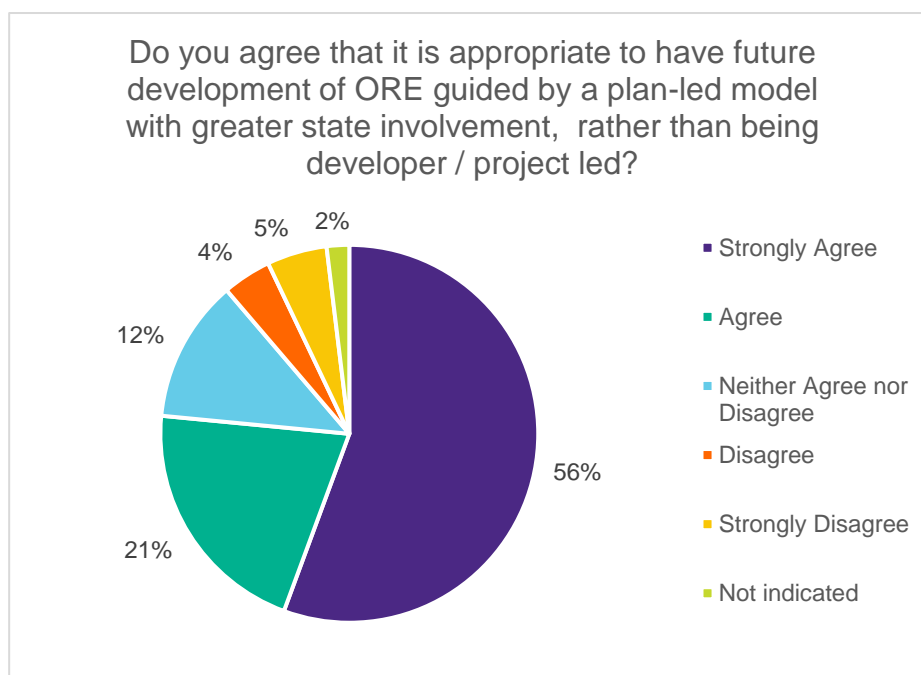
*Many respondents submitted feedback on the plans to adopt an approach known as the Future Framework that will result in a **plan-led, rather than developer-led**, approach to identify the optimal locations for ORE.*

*The approach was welcomed by a broad range of stakeholders who noted the opportunities to **streamline development, support environmental protection and ensure a whole of Government approach**. It was submitted that the approach needs to be **comprehensive and timely and use best practice and engage appropriate expertise**.*

*Some concern was expressed that the approach may jeopardise proposed projects, that there may be **resourcing challenges** in some relevant Government departments and state agencies to implement this, and that more needs to be done to **reassure investors** hoping to support ORE projects in Ireland.*

The OREDP II is part of the State's wider approach to the management of ORE development into the future. It is part of what is called the Future Framework, or a long-term, plan-led approach to the management of this natural resource. Respondents to the consultation were asked for their views on this plan-led approach.





**Figure 12 – Response to online survey question regarding attitudes to the proposed Plan-led approach**

57% of respondents strongly agree or agree that it is appropriate to have future development of ORE guided by a plan-led model with greater state involvement, rather than being developer / project-led, with just 9% indicating that they either disagree or strongly disagree.

In general, the proposed plan-led approach was welcomed by respondents including ORE developers, fisheries representatives, State agencies such as EirGrid and Local Authorities, who see the State taking the lead as a positive move which may help to streamline development. A small number of respondents admitted some scepticism on the viability of this approach and submitted that it should remain developer led. Others suggested a State / developer collaboration to help match industry ambition.

There were several requests for clarity from ORE developers on the relationship between the different ‘Phases’ of ORE development and the OREDP II in the context of the Future Framework. It was remarked that the plan as written “falls significantly short of providing a clear spatial roadmap to underpin the Enduring Regime” [sic]. Some misgivings were expressed on the speed of which policy position is changing, citing industry uncertainty as a result.

Many comments were received in relation to the proposed approach, including:

- That a plan-led approach will help to coordinate onshore and offshore energy systems and have the potential to reduce infrastructure, minimise speculative activity, and minimise associated environmental impact, allowing the State to take advantage of “whole of system synergies”.
- It was stated that while a Government-led approach is welcome, perhaps it is too late and falling behind on targets. It was submitted that the plan-led approach should be progressed according to the urgency of the climate crisis and to show certainty to investors.
- That the move to the Future Framework should not impede Ireland’s ability to meet EU obligations for renewable energy.
- Disappointment was expressed as regards some projects which are already underway and the impact the change to a plan-led approach will have on these, especially for those in areas that are not included in the BAs. It was highlighted that the OREDP II should consider the market context / investor confidence in Ireland and not develop in isolation.
- Parts of the OREDP II were stated as being contradictory, suggesting that there is still a place for developer-led projects in the pre-Future Framework, which it is claimed runs contrary to the Phase 2 Policy Statement.
- Resourcing was identified as a key issue, with submissions suggesting that the plan-led approach will need support in the form of extra investment and resourcing including planners and other civil and public servants,

and that this may require support from industry. The financial ability of the State to support the approach was also flagged as a consideration such as to support planning and environmental resources.

- Comments were raised in respect the Phase 2 Policy Statement which was published shortly after the start of the public consultation on the OREDP II. Developers cited their concerns for the impact this Policy Statement may have on delivery of the Future Framework. There was also some concern that the plan-led approach was not expected to commence at this stage. Clarity was sought on what phases the OREDP II specifically covers.
- That the plan-led model will help to reassure people that ORE targets will be achieved in the best way possible using strategy, best practice, proper planning guidance etc. It was also suggested that the plan-led approach should set out a detailed step-by-step of how development will be facilitated and include transparency on how timeframes and targets will be achieved.
- It was stressed that for the plan-led model to succeed, there needs to be high levels of confidence in the Government.
- That a plan-led approach is best as there is too much overlap in the developer led approach.
- That there is a “growing gap” between the plan-led and developer led approaches in terms of the timeline for development and identification of areas to be developed with ORE vs. Government policy being in place.
- If a Government-led approach is to be taken that it needs to be complete and timely, reducing barriers to rapid development.
- It was suggested that the State should lead site characterisation, environmental assessments, consenting and grid connection assessments to reduce risk to developers.
- That added levels of bureaucracy may delay the deployment of offshore wind. One submission noted frustration, stating “It’s infuriating we will see further delays because the goalposts are moved again”.
- The plan-led approach should be developed and executed through consultation and engagement, with input from relevant sectors.
- That development “ultimately depends on” private sector developers, who need confidence that the State can help to facilitate progress.
- It was suggested that the State may suffer more from knowledge deficiencies compared to the private sector. It was suggested that the plan-led approach should seek to capitalise on the work that has been done to date by developers.
- That communities and the “little-guy” may be disadvantaged by the plan-led approach if they see themselves as up against the State rather than a developer.
- Queries on what happens to the plan-led approach in the event of a change of Government.
- Concern was expressed that this plan “does not adequately account for” or “does not have the flexibility” to “embrace new and emerging technologies”.
- That the plan-led approach needs to consider supporting infrastructure including ports, grid infrastructure and interconnectors.
- It was suggested by third level institutes including the Atlantic Technological University, University of Limerick and the Centre for Marine and Renewable Energy (MaREI), that partnerships with third level education providers should be pursued for Research and Development, as well as development of technical skills, in order to maximise the economic benefits of the plan-led approach.
- Best practice from other countries including the UK, Germany, and Scotland, as well as from international developers should inform the approach for Ireland. It was suggested that more international comparisons are needed in the OREDP II.
- Northern Ireland should be considered as part of the Future Framework to achieve an “all island” approach.

#### 2.4.1 Presentation and purpose of the draft OREDP II

- The general principle behind the plan-led approach and the development of the OREDP II was welcomed. It was suggested by consultees that aim and purpose of the draft OREDP II is not entirely clear, and that the

document should be underpinned by more focused objectives than those presented. It was remarked that although the plan purports to be a spatial strategy, that clarity is needed on what the exact output of the OREDP II is, and how it fits into marine planning hierarchy.

- Feedback stated that the plan should demonstrate enough flexibility for the dynamic technology environment which is seeing ORE developing at a rapid pace. There is some misgiving that the spatial designations and proposed review timescales may serve to restrict development and prevent the plan keeping up with new technological innovations.
- Further investigation of wave and tidal energy technology and their future potential. It was remarked that the OREDP II should make provision for experimental and demonstration wave and tidal devices and that these sectors may allow Ireland to be leaders in these technologies.
- It was put forward that clarity is needed on whether the OREDP II will underpin DMAPs for Phase 2 ORE developments, and for more information on the relationship between the OREDP II, Phase 3 developments and the Future Framework. It was also requested that DECC make clear how the OREDP II may impact Phase 1 projects which do not succeed under the upcoming ORESS auction, and that it is critical the plan does not preclude the development of these projects.
- It was suggested that the OREDP II should set out the timescales, methodology or criteria for how DMAPs will be developed from BAIs, and it was expected that this would have been available for consultation.
- It was remarked that in restricting areas of development the OREDP II may be failing to acknowledge challenges facing commercial development portfolios, such as that “some projects fail, and others will be delayed” and this may impact the achievement of OREDP II goals and targets.
- Frustration was cited that instead of providing clarity, the draft OREDP II has created doubts for the sector. It was also suggested that the plan is not coherent with other plans and policies, and that this is leading to confusion within the sector. While it is acknowledged that the OREDP II is just one piece of the puzzle, some respondents noted wariness with having to await future policies for more certainty.
- Some stakeholders suggested that engagement has not been adequate on the OREDP II, suggesting that many elements of the plan were not expected by stakeholders, even those involved in the advisory group.
- That the plan should show greater alignment with regional objectives as well as national plans and policies.
- That the OREDP II should be implemented for any ORE project currently in development including Phase 1 and Phase 2 projects to align with proper marine spatial planning.
- That the phrase “nothing in this strategy should be interpreted as limiting the ability of the relevant authorities to assess individual applications proposals for ORE in line with the relevant legislative provisions set out in the MAP Act and in the Planning and Development Act 2000 as amended (the PDA), and applicable EU legislation” is “highly contradictory” to the Phase 2 policy statement.

## 2.5 Sharing the Maritime Space

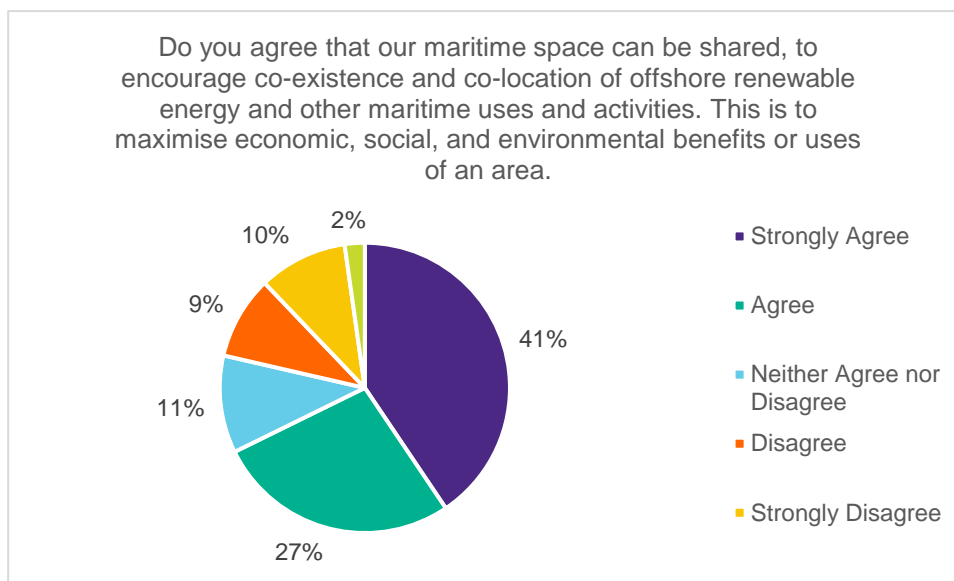
### Key Feedback on sharing the maritime space

*The draft OREDP II proposes that the maritime space can be shared to encourage the co-location and co-existence of ORE and other maritime uses and activities to maximise the economic, social, or environmental benefits or uses of an area.*

*It was generally agreed that different activities can exist with ORE in the marine environment. In particular, it was suggested that different types of ORE technology could exist in the same site, that certain kinds of aquaculture might be compatible, potential for educational and research uses of an ORE development, and that the potential for ORE sites to be integrated with MPAs be examined.*

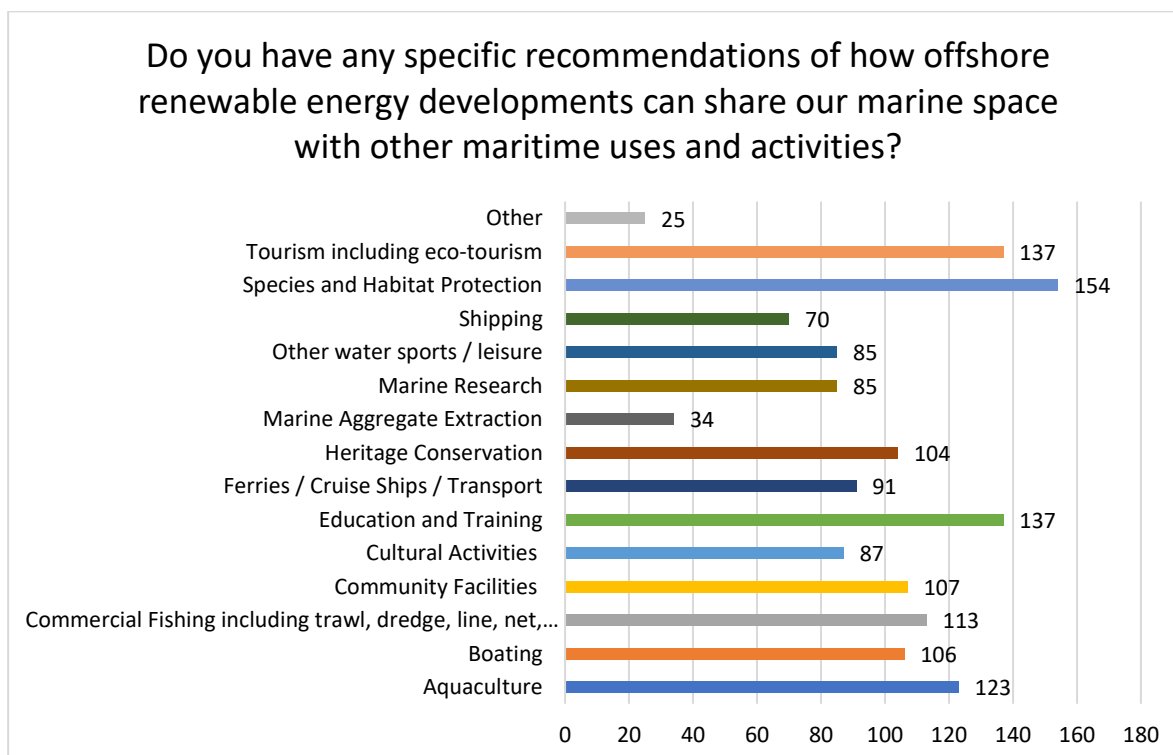
*It was not agreed that all activities could share the maritime space, with fisheries stakeholders in particular suggesting that it may not be possible to fish within ORE developments and had questions around liability and insurance.*

The draft OREDP II proposes that the maritime space can be shared to encourage the co-location and co-existence of ORE and other maritime uses and activities to maximise the economic, social, or environmental benefits or uses of an area.



**Figure 13 – Response to online survey regarding sharing the maritime space**

68% of respondents agree or strongly agree with the statement that our maritime space can be shared, to encourage co-existence and co-location of offshore renewable energy and other maritime uses and activities. This is to maximise economic, social, and environmental benefits or uses of an area, while 19% disagree or strongly disagree.



**Figure 14 – Response to online survey regarding activities that could share the maritime space**

A number of comments and recommendations were received in respect of this theme. There was general agreement that the maritime space can be shared, and that the development of ORE should not exclude other uses. The most popular shared uses suggested via the online survey included species and habitat protection, tourism including eco-tourism, education and training, and aquaculture.

Some respondents noted the extent of the maritime space and suggested that it should be possible to accommodate all users. However, others expressed doubt on the potential for other maritime uses to share the same space as ORE. Concern was also raised that as it is currently drafted, the draft OREDP II is not sufficiently aligned with the NMPF objective for co-existence and co-location and as written does not promote these approaches.

It was submitted that with proper planning and communications between sectors, ORE can be integrated into the plans for other maritime activities. It was also suggested that it is important to allow stakeholders and the public to be involved as part of a joined-up approach to planning and management.

Trust and rapport between the State, developers and stakeholders were deemed essential for the successful shared use of a marine area.

Specific suggestions and comments received on the concept of sharing our maritime space included:

**Table 4 – Suggestions and comments in relation to sharing the maritime space**

Maritime Use	Comments
<b>Co-location</b>	<ul style="list-style-type: none"> <li>In their submission, Wind Energy Ireland emphasised their “commitment to the idea of co-existence and co-location of ORE with other maritime uses and activities such as fisheries, aquaculture, shipping, Marine Protected Areas (MPAs) etc.”. However, they suggest that “approach and use of exclusionary data” ... “to limit [BAIs] and subsequent [DMAPs] means that Draft OREDP II unfortunately does not promote co-existence or co-location of ORE with other maritime users” and represents a missed opportunity.</li> <li>That all offshore infrastructure should have multi-activity outcomes.</li> <li>Co-location of different ORE technologies in the same spaces to reduce grid infrastructure – one line to shore – and use offshore space more efficiently. The term “energy multi-use parks” was submitted in a response from a member of the public. It was suggested that having technology specific BAIs may preclude this development.</li> <li>It was suggested by ESB generation that “hybrid grid connections” should be considered to help reduce the number of cable routes coming to shore.</li> <li>Establish how different maritime activities or environmental sensitivities will be weighed against each other to assess potential for co-location.</li> <li>Questions around liability and insurance to be resolved.</li> <li>That the ocean is a 3D space, and the entire water column should be considered usable.</li> </ul>
<b>Fisheries</b>	<ul style="list-style-type: none"> <li>Calls to develop management / coexistence plans that give clear direction to fisheries operating within ORE developments and clear up uncertainty on usable areas / exclusion zones.</li> <li>Some stakeholders including the Irish South and East Fish Producers Organisation suggest that it would be “impossible to fish successfully or safely with either mobile or static gears within an ORE development”.</li> <li>That the fishing sector is getting mixed messages on what fishing activities might be allowed and how insurance might work. It was submitted by a number of fisheries stakeholders that insurance for fishing vessels may not cover co-existence, and conversely that ORE insurance may not cover other uses of the development area. One submission from the North Regional Inshore Fishers</li> </ul>

	<p>Forum asked if the Government or an individual windfarm could provide a letter of comfort or guarantee to insurance companies to facilitate co-existence.</p> <ul style="list-style-type: none"> <li>• Provide protection to traditional fishing grounds and ensure that fishers are not excluded from these areas.</li> <li>• Implement straightforward compensation plans for fisheries impacted by ORE development.</li> <li>• Consult with the fishing sector to identify solutions for sharing the maritime space.</li> <li>• Calls to not position wind farms in existing fishing grounds.</li> <li>• Co-location of ORE with pot and net fishing was suggested, however, it was also submitted that activities including trawling, netting, and potting may not be possible around floating wind farms.</li> <li>• Concern on how cables or moorings will impact fishing and other maritime users (e.g., liability concerns).</li> <li>• That it is unclear yet how ORE will impact fish stocks or other commercial stocks such as lobster reefs (e.g., could vibration have a negative impact).</li> <li>• Some concern that larger offshore fishing vessels may encroach on inshore fishing grounds if their space is developed for ORE.</li> <li>• It was stated that “Brexit already impacts fishing”, and ORE may have further implications for the sector.</li> <li>• In response to the online survey, it was suggested that regulations be implemented governing fishing gear to mitigate against delays to marine surveys or damage to survey / fishing equipment.</li> </ul>
<b>Aquaculture</b>	<ul style="list-style-type: none"> <li>• That “more recognition and awareness” of the aquaculture sector is needed in relation to development of ORE.</li> <li>• It was cited that there is currently no aquaculture licencing beyond 12 nautical miles.</li> <li>• That cable routes and landfall are “of the utmost importance” to aquaculture and should be included in the OREDP II.</li> <li>• Offshore salmon farming should be explored in terms of its potential to collocate with ORE.</li> <li>• The possibility of integrating seaweed aquaculture with FLOW.</li> <li>• Potential for ORE foundation piles to have scallop nets strung between them.</li> <li>• Native oyster cultivation could be planned alongside windfarms.</li> <li>• Potential for energy generated from the ORE development to power aquaculture farms, and to develop “energy hungry” aquaculture at a larger scale.</li> </ul>



	<ul style="list-style-type: none"> <li>• Possibilities for mussel-farming with ORE development.</li> <li>• That excluding areas with existing aquaculture from BAIs will “rule out areas” and communities rich in knowledge in marine activities.</li> </ul>
<b>Biodiversity / Environmental Protection</b>	<ul style="list-style-type: none"> <li>• Implementing invasive species mitigation plans.</li> <li>• It was proposed that fishing activities be excluded from ORE areas, to potentially enhance fish stocks by protecting nursery and spawning grounds.</li> <li>• Floating wind turbines were suggested as possibly providing habitats for marine life.</li> <li>• It was suggested that there is potential to co-locate wind farms with MPAs.</li> <li>• One submission suggested that as the primary aim of ORE developments is not conservation, that they should not be MPAs, but could be Other Effective Area-based Conservation Measures (OECMs).</li> <li>• Potential to enhance ORE developments with artificial reefs.</li> <li>• Calls to avoid locating ORE developments on fish / seabird / mammal migration routes or areas where the natural environment could be “significantly altered”.</li> <li>• It was suggested that ORE “may contribute to the development of coastal protection”.</li> </ul>
<b>Community</b>	<ul style="list-style-type: none"> <li>• Plans are required to prepare communities for the likely changes arising from ORE developments.</li> <li>• Concern that displacement of marine users could have a “disproportionate effect” on island and coastal communities.</li> <li>• An integrated approach to development is required – including consultation with local communities.</li> <li>• Establish partnerships with communities and Public Participation Networks (PPNs).</li> <li>• Ensure economic imbalances are redirected to coastal communities using “positive discrimination”.</li> <li>• Consider opportunities for co-ownership of developments for coastal / maritime communities. Suggested that this may encourage cooperation between new and existing industries.</li> <li>• Ensure a local benefit / return and capitalise on the opportunity presented by rural Ireland. A submission from a member of the public suggested that “Utilising the untapped resources available to us in our rural communities” ... “would seek to alleviate some of the stresses on our current urban centres with a greater connection empowering Irelands greatest resource, its people, to thrive.”</li> </ul>

<b>Tourism / Amenity</b>	<ul style="list-style-type: none"> <li>• Submissions emphasised the need to protect “world class” surf breaks.</li> <li>• Concern was raised that ORE “could impact tourism”, “if views are disturbed”.</li> <li>• ORE as a tourism opportunity to “create and promote zero carbon holidays” and enhance the Irish “Green Brand”.</li> <li>• Use ORE development to enhance revenue streams from water-based tourism. This included potential for tourism / leisure businesses in the form of boat tours to visit wind farms.</li> <li>• Promote tourism offerings such as information centres, installations in local museums etc.</li> <li>• Potential for ORE developments to enhance angling tourism if windfarms can effectively become nurseries.</li> <li>• Recreational opportunities for diving.</li> <li>• Consider requirements of cruise ships.</li> </ul>
<b>Security / Defence</b>	<ul style="list-style-type: none"> <li>• Determine who is responsible for security, with a suggestion that DECC meets with the Department of Defence to discuss their views on the OREDP II.</li> <li>• Importance of the ability to secure and protect ORE infrastructure.</li> </ul>
<b>Research</b>	<ul style="list-style-type: none"> <li>• Establish partnerships with third level institutes.</li> <li>• Share weather data between offshore infrastructure including lighthouses, trawlers, data buoys and ORE structures to inform decision making.</li> <li>• Finance research through levies on ORE developers.</li> <li>• Investigate ways that the fishing community can contribute to data collection / research.</li> <li>• Allow marine research and monitoring in tandem with the development of an ORE site.</li> </ul>
<b>Education and Training</b>	<ul style="list-style-type: none"> <li>• Establish local education and training facilities (e.g., within local schools) to enhance teaching and learning regarding ORE and climate action / sustainability.</li> <li>• Education facilities could be included in the ORE developments.</li> <li>• Potential for school education study tours to ORE developments.</li> </ul>
<b>Shipping</b>	<ul style="list-style-type: none"> <li>• Important that structures do not interrupt shipping lanes.</li> <li>• Prohibit vessels navigating within 500m of an ORE development.</li> <li>• There is a need to establish protocols and a plan in the event that a ship breaks down within an ORE development.</li> </ul>



<b>Safety at Sea</b>	<ul style="list-style-type: none"> <li>• Management of safety and risk for leisure craft navigating near ORE developments.</li> <li>• Minimise non-professional activities in areas of ORE infrastructure.</li> </ul>
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## 2.6 Environmental Reports

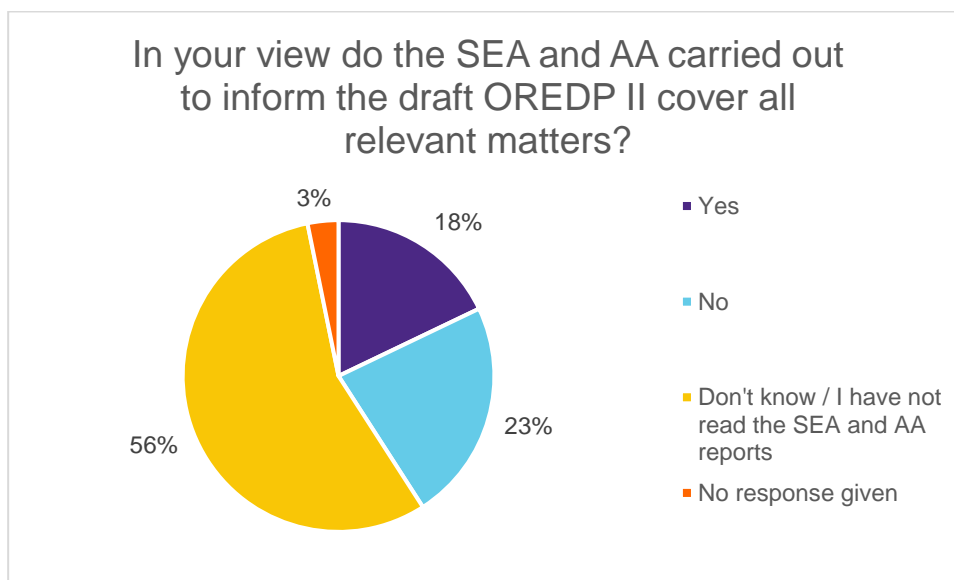
### Key Feedback on the associated Environmental Reports

*The environmental reports produced in support of the draft OREDP II report were welcomed, and it was cited that these documents are **important in supporting environmental protection alongside ORE development**.*

*Specific feedback was received in respect of the **Strategic Environmental Assessment and Appropriate Assessment** including suggestions as to additional matters for inclusion in the reports, additional **species and habitats** for consideration, and how **cumulative impact** has been addressed.*

*It was remarked that the environmental reports be **reviewed in tandem** with the finalisation of the OREDP II.*

Public consultation on the OREDP II ran concurrently with consultation on the associated environmental reports including a Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). A significant amount of feedback was received in respect of the environmental reports. These responses have been considered by DECC and their environmental consultants. The following section presents a high-level amalgamation of key feedback received on the environmental reports.



**Figure 15 – Response to online survey question regarding SEA and AA**

In response to the question 'In your view do the SEA and AA carried out to inform the draft OREDP II cover all relevant matters?' over half of respondents (56%) to the online survey stated that they Don't know / I have not read the SEA and AA reports. 23% of respondents answered 'No', with 18% answering 'Yes'.

The completion of supporting environmental reports was welcomed by respondents. However, it was submitted that these reports will only be relevant if they truly inform the process and are not just a “box-ticking” exercise.

It was agreed that it is important that the SEA and AA were conducted by an independent body, and not anyone with commercial interest. Another submission commented that “independent expert assessment” and advice is needed, “from a completely independent international source”.

### 2.6.1 Strategic Environmental Assessment

Feedback on the SEA included:

- That the SEA has not considered cumulative impact adequately. Respondents questioned why Phase 1 projects were not included in the SEA, while Phase 2 projects were despite no confirmation of specific sites or total energy output as of yet. It was also queried where the SEA has considered the impact of the recent Phase 2 Policy Statement. It was also proposed that the cumulative impacts of the ancillary development to support ORE should also be considered including offshore substations, interarray cables, cable routes to shore, landfall, and onshore substations.
- That given the rapidly changing policy landscape, the final OREDP II SEA / AA should include assessments of all relevant and updated policies.
- That the findings of the environmental assessments have not been adequately integrated into the OREDP II, and there should be a clear commitment to integrate and implement the recommendations identified in the SEA and AA into the OREDP II.
- That the SEA has not assessed the visual impact of ORE correctly. It is also suggested that the National Landscape Strategy be considered as part of the OREDP II SEA, and that the SEA should also refer to proposals for the EU Nature Restoration Law and revisions to the Renewable Energy Directive.
- That the OREDP II, SEA and NIS should include a Statement regarding the revised EU policy for ORE projects with respect to IROPI (Imperative Reasons of Overriding Public Interest).
- Feedback from some developers raised concerns that the SEA and AA were biased against fixed wind developments with an overt focus on FLOW.
- It was suggested that in order for the assessment and the OREDP II to be robust, they should also consider FLOW wet storage, floating platforms, floating solar, hydrogen generation technologies, and subsea hydrogen storage.
- A few submissions suggested some inconsistencies between the OREDP II and the SEA / AA. These include:
  - That the BAIs in the SEA are larger than those included in the OREDP II.
  - That the OREDP II states FLOW will be considered up to 100m of water depth, but the SEA states up to 120m, and whether this indicates that the SEA has assessed different considerations to the draft OREDP II.
  - Inconsistencies in conclusions between the SEA and the AA.
- Some respondents suggested that the BAIs should not have formed the basis for environmental assessments, and they should instead have focused on determining the suitability of the criteria to identify the BAIs. It was suggested that the SEA including BAIs, and likely areas of focus gives the impression that these “would appear to be in the final stages of completion... when they are not”. It was also submitted that the environmental reports do not provide clarity on how the areas were identified or assessed. Transparency was requested on how the initial BAIs identified in the SEA were refined in the OREDP II. It was also suggested that the “likely areas of focus” in the SEA being presented as BAIs in the OREDP II was confusing.
- That it is not possible to state if the proposed project-scale mitigation measures are tailored to the indicative BAIs or are applicable over all three areas.
- It was asserted that, given the data available for assessment, the level of detail in the SEA is not enough to adequately inform the OREDP II. One respondent gives the example of the need for habitat specific sensitivity assessments to be conducted on a national scale to inform the BAIs. It was also suggested that

the SEA consider fish species, whales, bats, cetaceans, birds including migrating and non-marine birds, elasmobranch species, marine benthic invertebrates, and shellfish.

- That the effect on fishing communities has “not been adequately covered”, with suggestions that the cumulative effect of all west coast ORE developments on fisheries has not been given proper consideration. Suggestions were also received that greater information on the impact on fish nursery and spawning should be included. However, one respondent submitted that there is a “political sensitivity regarding explicit reference to the impact of commercial fishing on the marine environment” and that “the SEA may have been influenced to side-step consideration of the greatest stressor of the marine environment, which is commercial fishing”.
- That monitoring should be included as part of the SEA and OREDP II at the strategic level and the OREDP II should provide clarity on how significant environmental effects of implementing the OREDP II will be monitored (pre and post development). It is recommended that the monitoring be closely linked to proposed mitigation measures. It was also highlighted that the SEA should contain the measures which will be used to mitigate any severe adverse effects on the environment. It was remarked that any mitigation and monitoring proposed should be related to the implementation of the OREDP II rather than lower tier stages, including DMAPs and project-level mitigation.
- Concern that some of the parameters for wind turbine technology used in the SEA are based on older prototypes and are “unrealistic for Phase 3 and the Enduring Regime to which OREDP II relates”.
- That the implications of the OREDP II in the context of population and human health should be included in the SEA.
- It was suggested at a consultation workshop that the SEA developed for the first OREDP was “more flexible”, and that the OREDP II SEA is less so, due to being based on today’s technologies.
- Several submissions from the fishing community queried whether the impact of electro-magnetic frequency (EMF) on commercial fish stocks was examined as part of the assessment. A small number of submissions from the public also suggested that EMF be considered in the context of human health.
- Whether the SEA has considered the cumulative impact of hydrogen related aspects of the plan.
- Submissions from the public suggested that the SEA and AA should have greater alignment with the Sustainable Development Goals (SDGs).
- A submission from Nephin Energy Ltd and Vermilion Energy Ireland Limited stated that the SEA and AA should acknowledge the installation and operation stages of ORE developments as distinct phases with different levels of impact and necessary mitigation measures.

### 2.6.2 Appropriate Assessment / Natura Impact Statement

Feedback on the AA / NIS included:

- Some concern was expressed that the AA did not adequately consider all ecosystems and “an extensive number of species that are subject to protection”, such as certain fish species and cetaceans.
- A submission from Simply Blue Group suggested that it was worrying to see SAC and SPA areas for marine mammals as scoring the highest risk, suggesting that this indicates a “broad brush” assessment.
- That the AA was limited in that it only considered the array area, and not cable corridors, associated landfall locations and onshore works
- That the AA and SEA parameters are different and the reasons for this are not explained.
- That as many Natura 2000 sites are located either partially onshore or in intertidal areas, this potentially limits the viability of the AA.
- That the in-combination assessment should include transboundary plans such as plans within UK waters which could impact on SPAs identified in the Natura Impact Statement (NIS).
- That the OREDP II, SEA and NIS should include a Statement regarding the revised EU policy for ORE projects with respect to IROPI (Imperative Reasons of Overriding Public Interest).

- The Irish South and East Fish Producers Organisation suggested that the AA should contain a full assessment of fisheries in the Irish Exclusive Economic Zone (EEZ).
- That it is unclear why the BAIs were not included in the AA when they were included in the SEA. It was suggested that this indicates the NIS does not cover the full scope of detail provided in the OREDP II and that this is a “deficiency” to be addressed.
- That the Statement in the AA that floating will have a less direct impact on the seafloor than fixed is “not true in many cases” and that for example, “when scour protection and anchors/moorings for many floating technologies are taken into account, the footprint is greater than some fixed foundations”.
- Concern that the NIS is too broad.
- That the outcome of the AA process should not be indicative but instead provide a clear and precise conclusion. The AA determination should be considered during subsequent AAs at DMAP / project stages.
- While the ‘risk-based’ approach adopted in elements of the AA (such as when determining Adverse Effects on Integrity of Site – AEIOI) are acknowledged as necessary by some respondents, others noted that the AA determination should be definitive and avoid reference to risk where this leaves uncertainty.
- Calls for greater transparency on the AA such as open access to information used.
- That the buffer zones recommended in the AA for QI species (species of qualifying interest) have not been adopted in the BAIs. It was also submitted that the criteria used to assign QI “interaction scores” aren’t aligned with the Office of the Planning Regulator practice note.

## 2.7 Data Management Framework

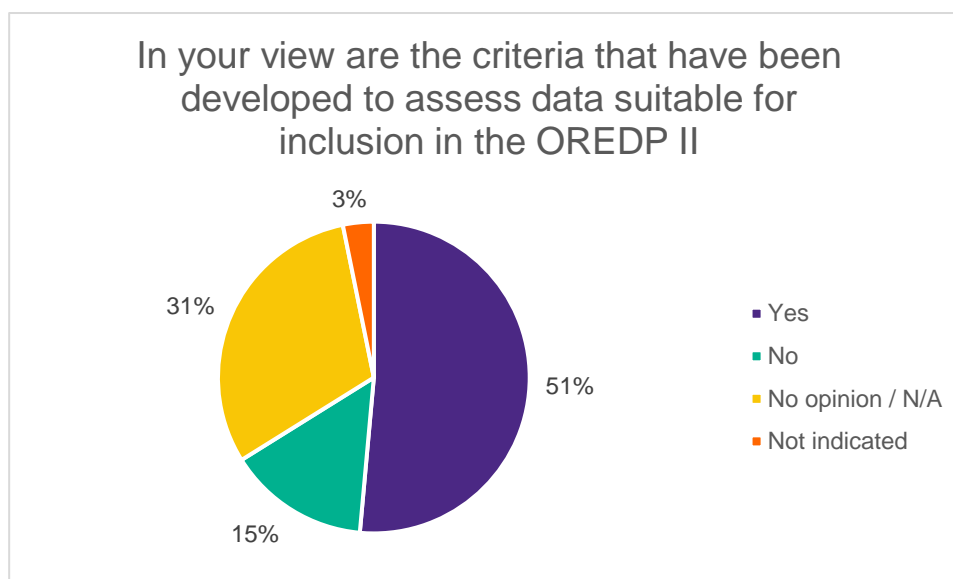
### Key Feedback on data management in the OREDP II

*A number of submissions commented on **data requirements** for the OREDP II and made suggestions as to **how data can be managed** moving forward to **inform future delivery** of ORE and management of data.*

*Suggestions included **establishing mechanisms and protocols** for data sharing between industry and Government, encouraging different agencies to **share their data**, and identifying ways to **standardise data** to ensure **consistency** and **quality**. Submissions also suggested the need to **properly resource agencies** such as the National Biodiversity Data Centre and the National Parks and Wildlife Service.*

*Opportunities to **collaborate with third level institutes** on the collection and evaluation of data, and suggestions as to how to **address gaps in fisheries data** were also raised through submissions, with concerns that some data gaps may impact decision making.*

The OREDP II is supported by extensive data collection, management, and analysis. A number of submissions commented on data requirements and made suggestions as to how data can be managed moving forward.



**Figure 16 – Response to online survey question regarding data included in the draft OREDP II**

Among the respondents to the online survey, 51% indicated that they agreed with the proposed criteria to assess the data included in the OREDP II, namely relevance, spatial relevance, provenance, accessibility and temporally valid. Of the respondents, 15% did not agree, and 31% said that they did not have an opinion on the topic.

- Many submissions were received in respect of sharing and reusing data. The ORE sector has emphasised the amount of data they hold on the maritime space and how it would be helpful in informing the OREDP II. It was suggested that mechanisms should be put in place to make it easier for the ORE industry to share their data. Potentially negative consequences of sharing information were cited by some as a barrier, and the need for better communication between Government, developers, and other data holders such as third level institutes was emphasised.
- It was submitted that sharing of data between stakeholders may contribute to a more robust decision-making process. It was recommended that data gathered in respect of the OREDP II be made open source and available to all and used by all developers to “minimise discrepancies”.
- It was claimed by some consultees that the cut-off of May 2022 for data to be included for analysis meant that information from projects which have since secured Maritime Area Consent (MAC) have not been factored into OREDP II. Some concern was expressed by Wind Energy Ireland that DECC did not incorporate all recommended data submitted in 2022 to the OREDP II Advisory Group on foot of a request for suggestions of data to be included in the OREDP II Data Catalogue.
- The Environmental Protection Agency (EPA) suggested that it would be beneficial to align OREDP II research activities with its research programme and thematic priorities.
- It was highlighted that a huge amount of data gathering, and evaluation is done in respect of acquiring licences including seabed data, archaeological data, biodiversity etc. and it was suggested that this data could be reused and included in the future evidence base.
- As well as sharing industry data, stakeholders also highlighted the need for State agencies and Departments to collaborate on data sharing, with examples given including the Department of Agriculture, Food and Marine and the Sea Fisheries Protection Authority. It was noted that there is a lot of data housed within State bodies, and that it is important that a process for data sharing be established.
- It was put forward at the Killybegs workshop that effective marine clusters can aid the collection of data.
- Among the suggestions included an expansion of the National Biodiversity Data Centre, greater resourcing and investment in the National Parks and Wildlife Service, more resourcing for data management for local authorities, and greater consideration of citizen science mechanisms.
- That an appropriate Data Sharing Protocol be agreed with developers with the required assurances on safeguarding of data and encourage them to share data.

- Gaps in fisheries data were recognised by respondents. It was noted that this information is invaluable as the fishing community have significant local data and knowledge. One respondent voiced their concern that in the rush to develop ORE, inaccurate data has been employed which could put livelihoods at risk.
  - Stakeholders cited challenges to addressing this including a lack of data on smaller inshore vessels that don't carry Automatic Identification Systems (AIS) (it was suggested that such vessels could represent up to 80% of the national fleet), and concern that some smaller vessels do not have accurate catch records.
  - Solutions suggested included developing incentives for fisheries to share data, establish confidential mechanisms for sharing of information, and identifying ways of verifying data. A response suggested that standardised data gathering tools could be provided to fisheries to allow them to contribute to the dataset. It was also cited that local innovation centres and co-operatives could be useful sources of data.
- There was some concern expressed that data gaps may delay delivery on the OREDP II. It was welcomed that the "best available data" be used right now rather than waiting for perfect data. One submission suggested that a "deploy and monitor" approach be taken in the absence of data.
- That it would benefit the OREDP II to clearly identify, prioritise, and establish a process for addressing data gaps regarding all potentially affected receptors.
- The need for rationalisation and standardisation of data was submitted. It was remarked that stakeholders are collecting data in different ways. A data collection framework was suggested as a useful tool. As well as standardising data collection and storage, it was also put forward that there should be a commonality in the interpretation of data for decision making purposes. It was proposed that proper resourcing be put behind this, and an authority be put in charge of overseeing the data.

### 2.7.1 Other Comments Related to The Data Management Process

- Making provision for ongoing data gathering in dynamic coastal areas.
- That the acceptable time limit for survey data should be made clear.
- Regulatory guidance on the sharing and re-use of data to maintain integrity.
- Rules from Government regarding the collection and sharing of industry data.
- Opportunities for third level institutes to benefit from and contribute to the evidence base.
- Ongoing updates to the OREDP II evidence base.
- The need for local data as international data is not appropriate for application in Irish waters.
- Collection of independently gathered environmental data, and more surveys related to species and habitats impacted by ORE.
- It was asserted at several workshop discussions that additional data should be considered to inform the OREDP II, including CSO data on population, employment, housing, etc; skills analysis undertaken by regional authorities / other Government departments / agencies; as well as data from the IDA regarding industrial needs / requirements.

## 2.8 Review of the OREDP II

### Key Feedback on the OREDP II review process

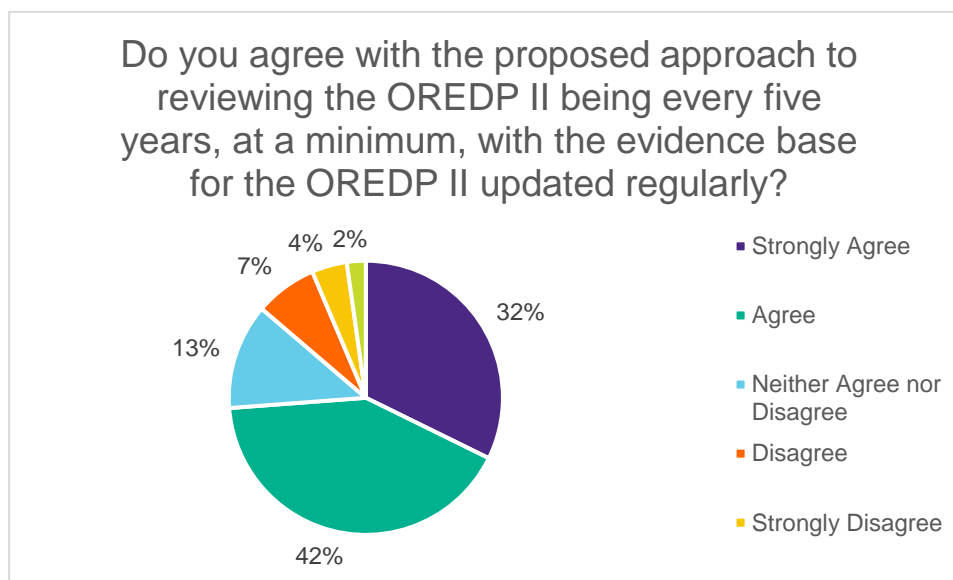
*In general, respondents to the consultation including those at workshops **agreed** that the OREDP II be **reviewed every five years**, with potential for an earlier review in the event of a major policy change or similar, but with caveats.*

*It was strongly suggested that the review timeline should consider **aligning with other relevant plans and programmes**, such as County Development Plans, the Climate Action*



**Plan or Local Economic and Community Plans. It was also suggested that the OREDP II outline *how the review process will take place*, and that it should be *flexible* to account for any rapid changes in technology and policy.**

It is proposed by DECC that the OREDP II be reviewed every five years, with potential for an earlier review in the event of a major policy change or similar. It is also proposed that the evidence base underpinning the OREDP II be updated and maintained regularly.



**Figure 17 – Response to online survey regarding proposed review cycle of OREDP II**

Among the respondents to the online survey, 74% agreed or strongly agreed with the suggested approach, and just 11% disagreed or strongly disagreed.

Generally, across the submissions including feedback from consultation workshops, the five-year review timeline was agreeable to respondents, with other suggestions received for the review to take place anywhere between one and seven years.

### 2.8.1 Recurring Feedback Received in Respect of the Review Timeline and Process

- A regular review of the draft OREDP II was deemed important by most consultees with review periods being suggested at 3, 5 and 7 years; while the majority deemed a 5-year review would be most appropriate. On the other hand there was feedback that a 5-year review might be too long in that it may restrict developments securing partners / investment.
- That if a 5-year cycle is being used, that care will need to be taken that DMAPs in the next OREDP II do not undermine the DMAPs from Phases 2, 3 and the Future Framework which should have been identified by then.
- That the plan be kept flexible or reviewed on a case-by-case basis, to allow review and revisions in response to changes “beyond its control”. Some consultees asserted that the plan should be updated annually from the outset – for the next 3-5 years at least – to consider the fast-paced changes in technology and policy context; and that the review process can be extended over time. Interconnector and hydrogen technology in particular were flagged as areas where a more frequent review would be necessary in order to provide a “quicker reaction time” to address emerging technologies.
- That the review process of the OREDP II should be considered in the context of the development planning process, with one response suggesting that a development can take 7-10 years to get permission.
- The time of review should not be fixed to set timelines but instead be at key stages such as following deployment of first wind farm; or aligned to development plans for the Offshore Renewable Electricity Support Scheme (ORESS) Auctions and Maritime Area Consent / ORE targets



- Many respondents suggested that the review of the OREDP II could benefit from being aligned with the processes and cycles applied for reviewing other policies and plans such as Local Authority County Development Plans, Local Economic and Community Plans, Maritime Spatial Strategy Review, or the Water Framework Directive; and to tie the review process into the same cycles as the environmental reporting. Feedback in this context included that public and stakeholder consultation should be undertaken at the half-way mark of the OREDP's life-cycle.
- That the review process is welcome once it does not delay development. It was noted in the responses that developers and investors are keen on certainty, and there is some concern of a risk to developments if the rules of the OREDP II change following a review.
- It was suggested that the OREDP II should explicitly specify the time period over which it will apply, i.e. the years for when it is valid.
- The EPA suggested that key objectives in the OREDP II should be "codified" to enable efficient review.

### 2.8.2 Other Comments Received in Respect of the OREDP II Review Process

- That the OREDP II review should be assessed independently.
- That it should be made clear how the SEA and AA processes fit into the review stage so that changes to the OREDP II can be "assessed and mitigated where required".
- That future iterations of the OREDP II should include BAIs for wave technology.
- Resourcing was flagged as a potential issue for the review / data management process.
- That as part of the review process, a full scope review of the local, regional, and national impact of the OREDP II be examined (e.g., economic, environmental, and cultural impact).
- That the plan should specify what will be reviewed and how the review will be done.
- The review should ensure that what is working well will not be changed.
- That learnings from developments should be taken on board during the review. Submissions cited that by the time the next review process comes around, a number of developments may already be deployed, the learnings from which might inform the review. It was suggested that it should be made clear how evidence from the ORE sector will be considered in future iterations of the plan.
- That clarity is needed on what or who can trigger an earlier review of the plan and who will be involved in the review cycle.
- That the evidence base needs to be frequently updated (monthly to annually). It was also suggested that the evidence base be shared online including environmental data submitted by industry.
- That all relevant stakeholders should have a role in the review process.

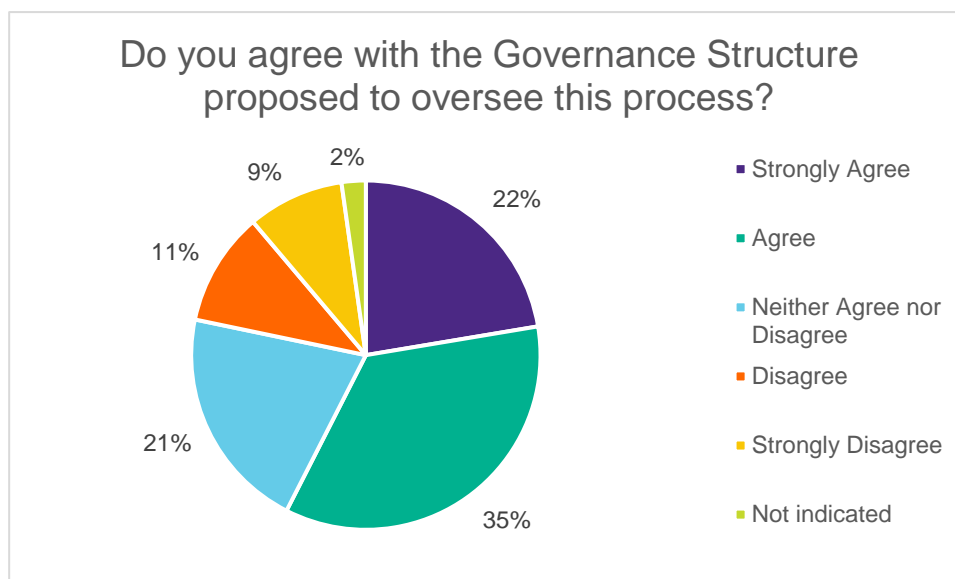
## 2.9 Governance

### Key feedback on the governance of the OREDP II

*The draft OREDP II proposes a governance framework to oversee the implementation of the plan, comprising of a **Steering Group** and **Project Team** advised by an **Advisory Group**, a **Data & Scientific Group**, and an **Environmental Group**.*

*Many suggestions were received in respect different **groups, sectors and organisations** that should be considered for inclusion in the governance structures to **implement and manage the OREDP II**.*

The draft OREDP II proposes a governance framework to oversee the implementation of the plan, comprising of a Steering Group, Project Team of the Department of Environment, Climate and Communications (DECC), Geological Survey Ireland (GSI) and Sustainable Energy Authority of Ireland (SEAI) advised by an Advisory Group, a Data & Scientific Group, and an Environmental Group.



**Figure 18 – Response to online survey regarding proposed governance structure**

A significant proportion of survey respondents (57%) agreed or strongly agreed with the proposed Governance Structure. 20% disagreed or strongly disagreed with the suggested structure, with a further 21% responding that they neither agreed nor disagreed with the proposed approach.

It was generally welcomed that the State is proposing to take a greater role in overseeing and managing ORE development in Ireland. A number of submissions included comments on the proposed governance structure, including suggestions on who should be involved. Some of the recommendations included:

**Table 5 – Examples of suggested groups for representation on governance structure of OREDP II**

Bord Iascaigh Mhara	Fisheries representatives	National Inshore Fisheries Association
Citizen Representation	Gas Networks Ireland	Naval Service
Community Representation	IDA Ireland	Port Authorities
Department of Agriculture, Food and Marine	Industry Groups	Public Participation Networks / Regional Stakeholder Groups
Department of Enterprise, Trade and Employment	Inshore Fisheries groups	Sea Fisheries Protection Authority
Department of Housing, Local Government and Heritage	Irish Chartered Skippers Association	Seafood-ORE working group
Department of Transport	Local Authorities	Sligo Fisherman's Association
EirGrid	Marine Institute	Údarás na Gaeltachta
Enterprise Ireland	Maritime Area Regulatory Authority	Western Development Commission
EU Small Scale Coastal Fleet (SSCF)	Marine Renewables Industry Association	Younger stakeholders

### 2.9.1 Other Feedback Received in Relation to Proposed Governance Structure

- That the OREDP II should contain more specific information as to the makeup of the governance structure.
- Many respondents cited the need for a greater role for Local Authorities and regional government in the governance structure and for more clarity as to how the plan will be implemented / managed at a local level.
- That a group should be included to advise on “technological advancements”.
- There were some misgivings submitted for the ability of MARA and An Bord Pleanála to meet the requirements of the OREDP II, citing known resourcing difficulties on the board, and that MARA has yet to be properly established.
- The need for community / citizen input and involvement was emphasised in submissions, with concern that vested interests of groups in the governance structure could override the voices of communities. Groups including Blue Horizon, Coastal Concern Alliance, and Killiney Bay Community Council suggested that they would be relevant citizen representatives.
- It was suggested that means of supporting community ownership of ORE projects be investigated.
- Submissions cited the approaches taken in other countries, such as Norway and Denmark, and suggested we follow international best practice for managing our natural resources. The UK examples of the Offshore Wind Programme Board and Offshore Wind Industry Council were advised as a good model to follow.
- The need for greater and more structured representation for the fishing sector within the governance structure. There was some concern expressed by fisheries that they were either being ignored or not taken seriously as part of this structure, with the inshore sector in particular citing poor representation.
- That there should be investment in a strong management team within DECC with demonstrated offshore energy experience, even if this means sourcing internationally.
- That the process should State-led or by an independent agency / body. It was also submitted that energy resources should be state-owned and developed using a plan-led approach.
- That the process should be led from the Department of An Taoiseach if it is to happen at the scale desired.
- That there should be a dedicated Minister for Renewable Energy.
- That a single Government Department should have oversight of ORE development.
- The need for clear governance and communications structures to be established and maintained into the future.
- The ORE sector asserted that it should be involved in the Government's ORE taskforce. It was also remarked that consideration also be given to “relevant bodies to provide further oversight/advisory on green hydrogen, ammonia and e-fuels”.

- That balance between the authority or power of different stakeholders should be established and weighted. An example given was the different powers of individual Government Departments and how to address this.
- It was suggested that fora that already work well, such as the Shannon Estuary Economic Taskforce, should be replicated in other locations.
- Inclusion of Northern Ireland representation or development of Areas of Cooperation between North and South to ensure a whole island approach.

### 2.9.2 Related Policies

- It was highlighted in responses that the OREDP II should have a more strategic view. It was suggested that DECC should publish a “consolidated action plan” which sets out how various policies will fit together.
- That the OREDP II should be aligned with the Phase 2 Policy Statement for offshore wind.
- That the OREDP II and associated environmental reports should include a Statement regarding the revised EU policy for ORE projects with respect to IROPI (Imperative Reasons of Overriding Public Interest).
- The Department of Agriculture, Food and the Marine noted in their response that the plan should consider policies such as the Government’s Food Vision 2030 to have regard to the potential impact on coastal communities dependent on the seafood sector which could be impacted by ORE.
- Submissions highlighted ambiguity on the relationship between the first OREDP published in 2014 and the OREDP II and asked whether it supersedes or complements the original plan. The status of the first OREDP is also cited as being unclear, with suggestion by Wicklow Wildlife Welfare that a proper review of the plan was not conducted.
- It was highlighted that DECC may consider support for wave and tidal energy in the context of a future policy statement.
- More clarity requested on how the different phases of offshore development in Ireland will interact with the various legislation and policies being developed.
- That the OREDP II should ensure that the outcomes are aligned with the aims of the Climate Action Plan 2023.
- That the OREDP II will need to consider revisions to the Renewable Energy Directives which were cited as being in “the final stages of agreement” and may affect future permitting for renewable energy projects, as well as the Trans-European Networks for Energy (TEN-E) and the EU Energy System Integration Strategy.
- That the OREDP II should be better aligned with the REPower EU policy in terms of how it identifies areas for development, with suggestions that the plan should “embrace the accelerated consenting mechanisms provided for ‘go to areas’” for ORE. It was suggested that in the context of the environmental reports, the in-combination impacts of policies and plans related to the Renewable Energy Directive, Strategy for Offshore Development and REPower EU should be considered.
- That the OREDP II complement the upcoming Hydrogen and Interconnector Policies and consider policies including the 2020 EU Hydrogen Strategy and the Recommendation on Energy Storage. It was also suggested that energy storage policy needs to be updated as “an imperative for cost effectiveness and energy security”.
- Responses from some stakeholders including Local Authorities, Chamber groups and Shannon Foynes Port Company suggested that the OREDP II be cognisant of the National Ports Policy, County Development Plans, National Planning Framework and Regional Spatial and Economic Strategies.
- That the OREDP II is consistent with the supporting environmental reports.
- Aims of the OREDP II should align with Project Ireland 2040 and the National Energy and Climate Plan.

## 2.10 Supporting Infrastructure

### Key feedback related to supporting infrastructure

*Participants in the consultation stressed the importance of **proper supporting infrastructure** such as **ports, grid infrastructure**, and **education and training facilities** in the context of ORE development.*

*Ports in particular were emphasised as **critical to supporting ORE development**, with submissions urging for **proper planning and investment in both commercial and fishing ports** to support the development, operations, and maintenance of ORE infrastructure.*

*Many respondents stressed the need for the OREDP II to **recognise and support policies and agencies** working to improve this infrastructure.*

Considerable feedback was received in relation to supporting infrastructure needed to realise the OREDP II. It was highlighted that there is a gap in the available infrastructure and the potential for development of ORE. It was suggested that the OREDP II should describe the extent to which the plan takes onshore infrastructure into account.

Feedback primarily related to ports, grid infrastructure, interconnectors, local infrastructure, hydrogen storage and generation, and educational facilities is summarised in Table 6 below.

**Table 6 – Submissions related to supporting infrastructure**

<b>Port Infrastructure</b>	<ul style="list-style-type: none"> <li>• That the draft OREDP II does not adequately convey the urgency needed to increase the capacity and ability of ports to facilitate ORE and that greater emphasis should be put on shore-based infrastructure within the OREDP II.</li> <li>• The opportunities for ports and harbours to benefit from investment to make them suitable for ORE support was welcomed.</li> <li>• It was cited that ORE targets should also consider what is required to upgrade ports including land purchase, foreshore licence, planning permission etc.</li> <li>• Submissions suggested that the Irish State should invest in ports to maximise the potential for constructing and servicing ORE.</li> <li>• It was highlighted that Belfast is currently the only port on the island with the potential to support ORE development. Commercial ports including Cork and Shannon-Foynes were highlighted as potential large ports to support ORE development with the necessary upgrades.</li> <li>• Fishing ports including Ros a Mhíl and Killybegs were also highlighted as potentially supporting ORE. Submissions highlighted the focus of the National Ports Policy on commercial ports rather than ports operated by the Department of Agriculture, Food and Marine, and that their potential to support ORE should be examined. Some worry was expressed that local benefits of ORE may be limited to bigger ports and not smaller harbours.</li> </ul>
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	<ul style="list-style-type: none"> <li>Concern that a lack of port infrastructure may see most work carried out overseas was raised, along with the potential knock-on impact this could have in terms of missed opportunities for Irish companies.</li> <li>The need for deep water port capacity was emphasised.</li> <li>It was suggested that devices be designed to be deployed from existing ports.</li> <li>In addition to the physical port infrastructure, submissions highlighted the existing potential from supporting infrastructure that is already in place. Killybegs was given as an example, where there is existing skilled labour, vessels, chandleries, and factories to support ORE.</li> <li>Need for surveying and upgrading of piers to support maintenance and crew transfers was also highlighted.</li> <li>That ports should be tasked with creating detailed plans for how they will support ORE. Submissions referenced the Shannon-Foynes masterplan that was developed, and the potential to replicate this for other ports.</li> <li>One submission suggested investment opportunities between ports and developers to support infrastructure improvements.</li> </ul>
<b>Grid Infrastructure</b>	<ul style="list-style-type: none"> <li>The draft OREDP II was welcomed as an opportunity to further improve the grid.</li> <li>It was suggested that the OREDP II might help to inform EirGrid investment.</li> <li>Submissions highlighted the need for more research and investment in the grid system before development can begin.</li> <li>Respondents emphasised that grid infrastructure and ORE need to be looked at together and cannot be developed in isolation. It was suggested that the grid needs to be developed to meet ORE needs, and not the other way around.</li> <li>Lack of grid infrastructure on the west coast was highlighted, suggesting that it feeds into uncertainty.</li> <li>It was remarked that the need for supporting grid infrastructure may lead to a “grid-led approach” rather than plan-led.</li> </ul>
<b>Interconnectors</b>	<ul style="list-style-type: none"> <li>Respondents asked where future interconnectors will go. It was cited that they are needed to connect to the European grid.</li> <li>A submission made the point that interconnector policy will need to be cognisant of SPA legislation and the potential challenges this may face.</li> <li>A small number of respondents suggested that there should not be a focus on interconnectors at this stage and that the focus should be on meeting domestic demand.</li> </ul>
<b>Local Infrastructure</b>	<ul style="list-style-type: none"> <li>Improving local infrastructure to be able to support ORE including roads, accommodation, access routes etc. was highlighted in a number of submissions.</li> </ul>



	<ul style="list-style-type: none"> <li>It was suggested that the reopening of the Western Rail corridor may support ORE development in the West of Ireland.</li> </ul>
<b>Hydrogen Generation / Storage</b>	<ul style="list-style-type: none"> <li>Respondents queried where and how green hydrogen might be stored onshore, and whether it needs large areas onshore for processing.</li> <li>It was suggested that hydrogen be prioritised for some areas, with the suggestion that certain areas could act as “hydrogen hub[s]” for industry.</li> <li>Respondents noted that supporting infrastructure along with physical space is needed for hydrogen.</li> <li>That suitable “geological settings” for offshore hydrogen storage should be included in the OREDP II as a key component of deriving benefit from increased ORE. It was suggested that the plan should include a section on offshore energy storage. The Kinsale and Corrib pipelines were suggested as potential infrastructure to transport / store hydrogen in the future.</li> </ul>
<b>Educational facilities</b>	<ul style="list-style-type: none"> <li>Respondents suggested the potential for education and training facilities based in areas where ORE development will take place (example of Shannon given). It was highlighted that this should be in place before the industry “takes off”. More feedback on education and training is outlined in Section 2.11.</li> </ul>

## 2.11 Skills and Training

### Key feedback on skills and training requirements

*Having the **proper skills and resources in place to plan, design, implement and manage ORE** was deemed critical in submissions but also a major challenge to be addressed.*

*Submissions highlighted opportunities for **collaborating with third level institutions, training centres and schools**, as well as examining apprenticeship opportunities and alternative training.*

***Retraining and upskilling for fishers** was also identified as an opportunity presented by ORE to diversify employment and offer seasonal work for those in the fishing sector.*

***Resourcing** of Government departments, State agencies and planning bodies was cited as a concern to some stakeholders as something that could delay progress on ORE development.*

Having the necessary skills and workforce in place to construct and operate ORE was highlighted in many submissions as being both important and an urgent consideration, with opportunities and challenges identified. The opportunities for diversifying employment, upskilling, retraining, and retaining young people in coastal communities were welcomed, however, some concern was expressed that at present the skills and training opportunities are not in place to be ready for the industry.

There were also misgivings aired that there is a lack of resourcing in the administrative areas required to support the OREDP II including in MARA and the planning system, and a need for greater technological expertise to support this.



### 2.11.1 Feedback Related to Skills and Training

- The potential for people involved in the fishing industry to work on ORE projects. The seafaring skills of fishers as well as keen levels of local knowledge were highlighted as key skills needed to service and maintain ORE. It was suggested that offering employment in addition to compensation to the fishing sector would provide added value. It was suggested that this could serve as seasonal work, to allow the fishing industry to continue but supplement employment using ORE. Bord Iascaigh Mhara (BIM) training colleges were highlighted as potentially suitable training facilities.
- A challenge cited was that fishing vessels may not be appropriate for the industry, who may need specialist boats for operations and maintenance and would be difficult to repurpose. Others suggested that many in the fishing industry want to keep fishing and would not be interested in working in the sector. The issue of transferable 'tickets' was raised, with stakeholders suggesting the Marine Survey Office would need to allow greater flexibility on licences to allow fishing vessels to undertake crew transfers and other functions.
- Providing greater training opportunities through local schools, training facilities and community was highlighted as an opportunity to be investigated. It was suggested that facilities be built regionally to ensure benefits are kept in local areas, and that this would give particular value to coastal communities, who may see employment opportunities in this sector from ORE.
- That the resources and skills to develop DMAPs and fill positions in the organisations and structures who will be implementing the OREDP II need to be prioritised and developed. Education and upskilling of planning professionals was given as an example.
- Education in schools was submitted as being important to raise awareness of ORE and prepare the next generation for jobs in the sector. It was suggested that educational trips to ORE facilities would help to engage students in the topic.
- That the OREDP II should work with Regional Skills Fora, Higher Education and Further Education, and Professional institutes to "ensure education, training and upskilling is resourced and developed".
- The urgency in which the opportunities need to be put in place were emphasised in order to realise local benefits. A small number of submissions noted concern that if training is not available on time that local people will not stand to benefit from the jobs.
- The Atlantic Technological University and University of Limerick suggested that they have the potential to offer training that would be accessible to local people and fishers interested in retraining. However, it was also suggested that other pathways into the sector including apprenticeships be investigated.

## 2.12 Stakeholder Engagement

### Key feedback relating to stakeholder engagement requirements

*As part of the development of the draft OREDP II, DECC gathered and considered input from a wide range of stakeholders across the public sector, academia, industry, coastal and marine communities, and environmental groups.*

*Ongoing stakeholder engagement was deemed critical by respondents to the public consultation, who cited the need for engagement across all sectors impacted by ORE development. It was suggested that this would help tap into local and community knowledge, encourage awareness, buy-in and community acceptance, and tackle misinformation.*

*In particular, engagement with ORE developers and fisheries stakeholders from the earliest possible stage was noted as essential, and it was suggested a future stakeholder engagement process should be outlined in the OREDP II.*

As part of the development of the draft OREDP II, DECC gathered and considered input from a wide range of stakeholders across the public sector, academia, industry, coastal and marine communities, and environmental

groups, who participated through the OREDP II steering group, advisory group and data and scientific group. There was overwhelming support for the consultation process and the level of engagement undertaken, in particular the effort to engage directly with stakeholders at workshops and outreach in many coastal communities.

Consultees throughout the country and from all sectors provided feedback on the need for a similarly thorough and inclusive approach to stakeholder engagement and public consultation by DECC and other Government Departments going forward, stating that this will help to achieve the aims of the Climate Action Plan and ORE policy in particular, more than technical analysis alone.

While grateful for the opportunity the consultation provided, stakeholders also stressed that more effort needs to go into ongoing engagement. They highlighted a perception of a general lack of communication from Government and some ORE developers up to now. The need for local engagement with all stakeholders at the earliest stages was stressed as key to the fulfilment of any project, to provide certainty to stakeholders, and encourage ownership of the plan, particularly in communities which are facing ORE developments.

Fishers' representatives also asked for even more local / regional engagement by DECC / Government with their stakeholders going forward.

This engagement is seen as key to communities realising the benefits of ORE.

### 2.12.1 Other Suggestions and Comments

- The distinction between public consultation and ongoing engagement was made in some submissions as long-term conversations as opposed to one off events. Engagement was cited as being slower, but more important than consultation, which was viewed by some as a 'tick box' exercise.
- That future proposals for stakeholder engagement should be set out in the OREDP II.
- It was stressed in submissions that ORE developers need to make more effort to engage with communities. One submission was received from a group who cited poor consultation approach on a wind farm as the catalyst for their establishment.
- The need for greater communication with the ORE industry was cited. It was suggested that developers are receiving mixed messages, and that the feeling exists that DECC is not fully aware of the level of work being done by the sector and should do more to leverage their expertise. It was also remarked that community-led projects should have "a seat at the table" alongside larger developers.
- It was stressed that it is difficult for some stakeholders to engage in the process without more detailed information on the locations, scales and details of offshore development which is not provided in the draft OREDP II.
- It was remarked that the media may have a greater role to play in sharing information. It was also submitted that the State should do more to tackle misinformation. More publicity was suggested, including social media campaigns.
- The importance of open and transparent engagement with the fisheries sector was emphasised. One issue noted is that of too many projects trying to engage with groups and individuals, with others flagging concern that fishers do not feel that they have been adequately consulted.
- The vast local knowledge of fisheries was submitted as a key reason for engaging with the sector, as well as the need to engage on an individual / local level, as representative organisations do not necessarily speak for all fishers. It was stressed that engagement should be tailored to the different types of fisheries (e.g., inshore vs offshore; sole-traders vs large businesses).
- Engagement with international fisheries was also highlighted as necessary as they too may be impacted by ORE.
- Need for engagement with the broader maritime sector was also raised. It was submitted that DECC should engage more closely with ports, shipping companies, tug pilots, ferry companies, ships officers, estuary pilots, and pilot boat crews.
- Consideration of more youth engagement was submitted as key to raising awareness and build support for offshore energy.

- Engagement with environmental groups was cited as important to consider ORE in the context of protecting the marine environment.
- It was suggested that Public Participation Networks be consulted as they represent many local community interests. It was also submitted that local intermediaries could be established to maintain contact with communities.
- The need to engage local authorities to ensure alignment with onshore development plans was put forward.
- The need to consult with the tourism and hospitality sectors was highlighted.
- It was submitted that citizens should be represented on wind energy groups / forums going forward.
- It was suggested by SECAD that the opportunity to harness the skills and expertise of the Local Development Company network in Ireland be explored to help engage with communities.

## 2.13 Comments related to the Public Consultation Process

### Key feedback on the public consultation process

*The public consultation process was **welcomed** by consultees for the **high level of consultation** undertaken around the country, and for the **involvement of DECC** at consultation events.*

*While the number of events held was welcomed, a number of respondents were **disappointed** that there was **not an event in their locality**. Suggestions were also received in respect of ways in which the public consultation may have been **more accessible**.*

The consultation process undertaken was wide-ranging, with 20 events and extensive promotion of the consultation undertaken. The details of this are outlined in Section 1 and Appendix C of this report.

### 2.13.1 Robustness

- Many stakeholders were encouraged by the level of consultation and welcomed the workshop format including focused discussions on elements of the plan.
- It was submitted by a handful of consultees that the workshop format limited their ability to have a detailed discussion, and that a more open forum (townhall meeting style) could have been employed.
- Some expressed concern that the public consultation, particularly at a local level, was not extensive enough; this included fishers who expressed a preference for events in every port and harbour community.
- Some representative bodies including BIM and Inland Fisheries Ireland noted concern for members of the fishing community missing events. Other submissions from the fishing sector suggested that there has not been enough consultation with this group.
- At one workshop, several representatives from this sector noted they had heard of the event by default and noted a need for even greater promotion and direct communications with their sector.
- It was suggested by a respondent that the consultation should have been advertised on national television.
- It was remarked in a submission that consultation on the environmental reports should have had a greater role as the “cornerstone” of the public consultation.
- Concern was expressed by some consultees that the strategy is “already decided”, and they asked for clarity on how consultation feedback will be taken on board to finalise the OREDP II.
- While there was extensive representation from the ORE sector at workshops and the Maritime Industry online session, it was suggested that a specific session for the ORE sector should have been facilitated and should be considered for future consultations.

### 2.13.2 Accessibility

- The event held in Irish in Connemara was welcomed for engaging with the Gaeltacht community.
- Views were expressed that the Irish language used in the Connemara workshop was overly technical and that English terms for more technical matters and definitions would have been more easily understood.
- Respondents stressed the need to make the consultation as accessible as possible as many participants may not have a good baseline knowledge of the topic.
- Some respondents expressed views that the contents of the draft OREDP II were too technical to be easily understood by the general public.
- A small number of stakeholders noted that the process of having a waiting list for the workshops may have prevented some from participating (many stakeholders attended events without registering, others reserved a place and did not attend. In addition, some people were almost turned away from events due to space limitations as a result of a small number stakeholders attending several events.)
- Some concern was expressed that having much of the information online – such as an online survey and online workshop registration – might alienate some members of the public and limit access to the consultation to those who are not digitally literate.

### 3 CONCLUSION AND NEXT STEPS

The consultation was successful in generating a wide range of views from many different interests throughout all of Ireland. Key stakeholders took the opportunities offered to participate in the consultation, including people living and working in coastal communities.

With over 1,100 individuals and organisations engaging with the public consultation, a wide range and depth of feedback was provided at workshops, through the consultation survey and in written submissions, which represents many diverse views and interests.

#### 3.1 Key Takeaways from the Consultation

**That there are many potential benefits and opportunities for Ireland in developing ORE and delivering the OREDP II policy, including:**

- Ensuring a secure indigenous, sustainable, and cost-effective energy supply.
- Delivering on the aims and objectives of the Climate Action Plan.
- Generating new / more jobs and strengthening the local and national economies including rural areas.
- Developing training and education / research opportunities including in coastal communities, local education facilities, apprenticeship programmes and at universities / other third-level institutes.
- Supporting regional and community development including coastal / marine / island communities e.g., retaining young people through job creation as a result of new industries and new investment, and boosting supporting industries including accommodation providers and tourism.
- Maximising technology potential, including the potential to develop a native hydrogen industry to reduce fossil fuel dependency.
- Harnessing the potential for sharing the maritime space between different uses including ORE, fishing, shipping, tourism, research etc.

**Consultees called for:**

- Greater policy alignment and certainty across all existing and planned ORE policies, plans and programmes.
- Updated technical criteria to identify Broad Areas of Interest (BAIs), including changes to water depth and considering the most up-to-date and potential future technologies.
- Reassurance for developers and investors to ensure market confidence.
- Greater consideration of fishing impacts and co-existence between ORE and fisheries; and recognition of the different types / sizes of fishers in different waters / areas.
- A greater and more defined role for local and regional government in ORE development planning.
- Inclusive governance and a regular review process to be included in the final OREDP II.
- Resourcing to be made available to fully execute the Plan and associated requirements across Government departments and supporting agencies including MARA, An Bord Pleanála and the NPWS.
- Consideration of environmental impact in designating ORE sites and building / operating ORE infrastructure.
- Delivery of DMAPs to be progressed without delay.
- Consultation findings shared across Government and relevant agencies to inform a joined-up approach to ORE.
- Expertise and knowledge to be further built upon in order to future-proof Ireland's approach to ORE policy and planning.
- The role of ports and infrastructure to be carefully considered and given greater importance in the OREDP II.
- The approach to this public consultation and stakeholder engagement was welcomed and consultees called for DECC and other Government departments / agencies to adopt a similar approach to undertaking meaningful and timely stakeholder engagement going forward, with even more coastal communities, more in-person events and more sector-specific events to be included.

## **3.2 Next Steps**

This Consultation Findings Report is being published on the DECC website and will be used by DECC to help inform the finalisation of the OREDP II and associated environmental reports.

The Department continues to work on finalising the OREDP II, SEA and AA / NIS, which it intends to complete and publish this year (2023), subject to Government approval.

The Department has listened to stakeholders and considered all feedback provided which will inform it in finalising the OREDP II. This includes working with the dedicated SEA and AA environmental consultants to undertake further analysis / studies of issues raised in the consultation to ensure that the associated environmental reports take account of all relevant considerations.

Issues raised regarding technical criteria including water depths and the potential of different ORE technologies (including fixed bottom turbines) are also being studied by DECC to ensure the plan is in line with current best practices and technologies.

While it will not be possible for DECC to incorporate every suggestion into the final OREDP II, such as feedback related to education and skills and supporting infrastructure, DECC have committed to sharing the consultation feedback with other relevant Departments and agencies including the Department of Housing, Local Government and Heritage, Department of Agriculture, Food and Marine, EirGrid, SEAI and others for consideration as part of their current and future work programmes.

The OREDP II is one element of the Future Framework, which also includes development of a Hydrogen Policy, Interconnector Policy, and Economic Assessment, which are underway and expected over the next 12 months.

## Appendix A – Organisations and Elected Representatives who made written submissions

- Achill Community Futures
- Atlantic Economic Corridor Business Forum
- Bere Island Projects Group
- Blue Horizon
- Bord Iascaigh Mhara
- British Irish Chamber of Commerce
- Chambers Ireland
- Clare County Council
- Claremorris and Western District Energy Cooperative (SEC)
- Cllr Cillian Murphy, Clare County Council
- Cllr Jarlath Munnely, Mayo County Council
- Cllr Norma Moriarty
- Coastal Concern Alliance
- Coastwatch
- Codling Wind Park
- Comhairle Ceantar na nOileán
- Comharchumann Fuinnimh Oileáin Árann / Aran Island Community Energy Cooperative
- Commissioner Mairead McGuinness
- Conways Solicitors on behalf of South West fishers
- Copenhagen Infrastructure Partners
- Cork Chamber
- Cork County Council
- Department of Agriculture, Food and Marine
- Department of Defence
- DP Energy / Iberdrola
- Eastern and Midland Regional Assembly
- EDF Renewables
- EirGrid
- Energia
- Energy Cooperatives Ireland
- Engineers Ireland
- Ennis Chamber
- Environmental Protection Agency
- ESB Generation and Trading
- Fexco Offshore Renewable Energy
- Fred Olsen Seawind
- Fuinneamh Sceirde Teo
- Gaeltech Group
- Galway Bay Against Salmon Cages
- Galway County Council
- Gen Comm
- Green Rebel
- Griffin Boats Ltd.
- Hexicon
- HRA Planning on behalf of Shannon Foynes Port Company
- Hydrogen Ireland
- IFA Aquaculture
- Inis Offshore Wind
- Inishbofin Energy Committee
- International Foundation for Integrated Care
- Irish Chartered Skippers Association
- Irish Exporters Association
- Irish Islands Marine Resources Organisation
- Irish Planning Institute
- Irish Seal Sanctuary
- Irish South and East Fish Producers Organisation
- Joint Nature Conservation Committee
- Killiney Bay Community Council
- Landscape Alliance Ireland
- Limerick Chamber
- Limerick City and County Council
- Lumcloon Energy
- Mainstream Renewable Power
- Marine Renewable Industry Association
- Mayo County Council
- Met Eireann
- National Inshore Fishermen's Association / National Inshore Fishermen's Organisation
- National Parks and Wildlife Service
- Nephin Energy and Vermillion Energy – Corrib JV Partners
- North Regional Inshore Fisheries Forum
- Northern and Western Regional Assembly
- Ocean Energy
- Ocean Winds / Bord na Móna
- Offshore Wind Ltd.
- ORPC Ireland
- Orsted
- Ros a Mhíl Harbour Support Committee
- Royal Valentia
- RWE
- SEAI Sustainable Energy Communities (Co. Mayo and Co. Galway)
- Sean Kelly, MEP
- SECAD
- Shannon Foynes Port Company
- Simply Blue Group
- Sinbad Marine Services Ltd.
- Sligo Boat Charters
- Sligo Fisherman's Association
- Source Galileo
- Southern Regional Assembly
- SSE Renewables
- Statkraft
- Supernode Ltd.
- Údarás na Gaeltachta
- Valentia Island Development Company CLG
- Valentia Island Energy Ltd.
- Waveram
- Western Development Commission
- Wicklow Wildlife Welfare
- Wild Ireland Defence
- Wind Energy Ireland



## **Appendix B – Organisations and Elected Representatives who completed an online survey**

- Achill Community Futures
- Aran Islands Energy Co-op
- Ballisodare Fishing Club
- Ballycotton Fishermen's LTD
- Bere Island Boatyard
- Bere Island Projects Group CLG
- Bowline Risk Management Ltd
- Carlingford CLAMS (Co-ordinated Local Aquaculture Management Systems)
- Chambers Ireland
- Claremorris & Western District Energy Co-op Society Ltd.
- Cllr Joe Sheridan
- Cork Harbour Fishermen
- Cork Nature Network
- Corrib JV (Nephin Energy Ltd and Vermilion Energy Ireland Limited)
- Dingle Peninsula Fishing and Hunting
- Doyle Shipping Group
- Emerald Marine Environmental Consultancy Ltd.
- ESB Generation & Trading
- Fair Seas Ireland
- Fenit Town Hall Group
- Friends of the Earth
- Gas Networks Ireland
- Irish Chamber of Shipping
- Irish South and East Fish Producers Organisation
- Killybegs Fishermen's Organisation (KFO)
- Leahill Port Company
- Lough Swilly Wild Oyster Society Ltd.
- Not Here Not Anywhere
- Oilean Glas Teoranta
- ORPC Ireland
- Port of Cork
- Rederscentrale
- Rosses Point Development Association
- Simply Blue Group (Emerald Offshore Wind, Western Star Offshore Wind, Saoirse Wave Energy)
- Sligo Boat Charters
- The Irish Wildlife Trust
- Wind Energy Ireland

## Appendix C – Consultation Promotion

The consultation was advertised extensively in local and national newspapers, along with radio advertisements in both Irish and English. Press releases were also issued to national and regional outlets to generate earned news coverage.

An extensive social media campaign was undertaken, with advertising across Facebook and Instagram, as well as online advertising.

In addition, DECC employed its own social media channels to proactively promote the consultation during the 8-week period via Twitter, Facebook, Instagram, and LinkedIn.

### C.1 Advertisements

Advertisements promoting the consultation were placed in national and regional press at the start and near the midpoint of the public consultation.

Publication	Date Of First Advertisement	Date Of Second Advertisement
Cork Independent (As Gaeilge)	2 March	30 March
Donegal News (As Gaeilge)	2 March	30 March
Drogheda Independent	1 March	29 March
Dundalk Democrat	28 February	30 March
Galway Advertiser	2 March	28 March
Irish Independent	27 February	
Irish Independent – Seachtain (as Gaeilge)	2 March	
Limerick Post	2 March	30 March
Wexford People	1 March	29 March
Wicklow People	1 March	29 March

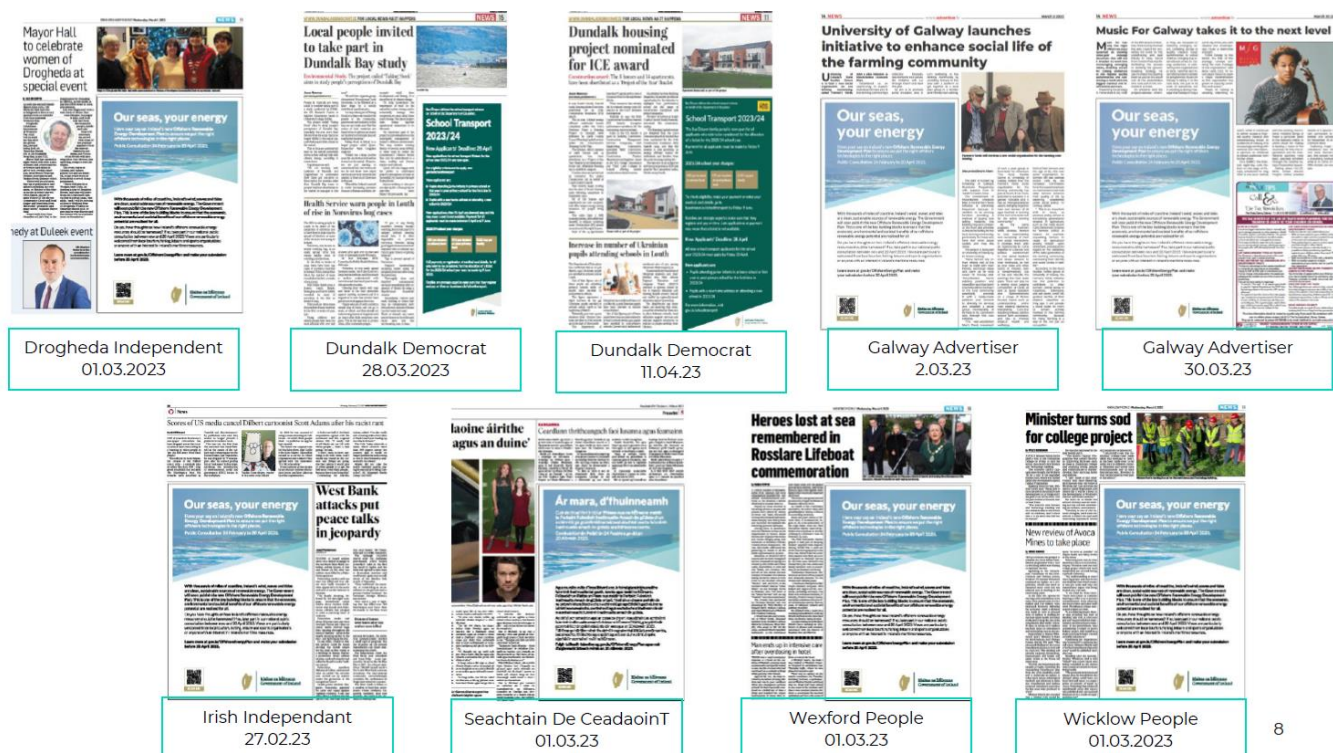


Figure 19 – In situ press advertisements

## C.2 Press Release

During the consultation, a national and regional press release was issued sharing details of the consultation. The regional press release received coverage in a number of publications around the country including:

- Dundalk Democrat – 14 March 2023
- Dublin Gazette – 16 March 2023
- Wicklow Times – 21 March 2023
- Munster Express – 28 March 2023
- West Cork People – 31 March 2023

## C.3 Radio Advertisements

Radio advertisements were broadcast from the launch of the consultation across the months of March and April. Advertisements were broadcast in both Irish and English. The regional stations used to advertise the consultation included:

- East Coast FM
- FM104
- Galway Bay FM
- Limerick 95FM
- LM FM
- Ocean FM
- Red FM
- South East Radio

## C.4 Digital Campaign / Social Media

To account for the huge uptake in the use of the internet and social media, a strong focus of the advertising campaign was on digital advertising across web and social media platforms using geographical targeting. There was a significant reach, with the English language social media campaign (Facebook and Instagram) reaching over 2 million people, and Irish language advertising reaching over 900,000 people. Overall, the social media campaign had an approximately 50/50 reach between males and females, with the age group of 25-34 delivering the most impressions.



Figure 20 – Social media (Meta) campaign

Digital advertising (across Google and multiple websites) reached nearly 900,000 people.



Figure 21 – Example of digital display advertising

In tandem with the digital advertising campaign, DECC ran a social media campaign across the consultation to promote the consultation across Facebook, Instagram, LinkedIn and Twitter, targeting combined follower numbers of nearly 39,000 across the 4 platforms.





Figure 22 – LinkedIn posts promoting public consultation on the OREDP II



Figure 23 – Examples of Twitter posts promoting public consultation on the draft OREDP II

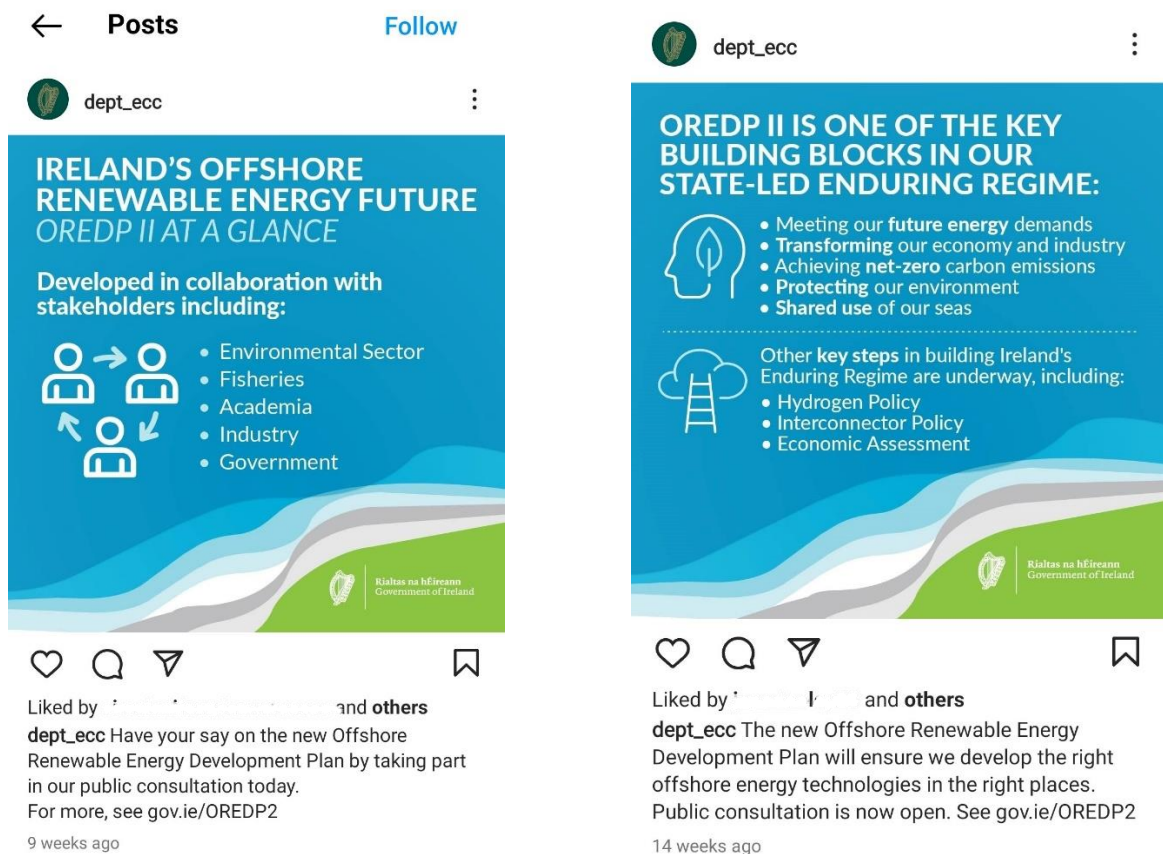


Figure 24 – Instagram posts promoting public consultation on the draft OREDP II



Figure 25 – Facebook posts promoting public consultation on the draft OREDP II

## Appendix D– Online Consultation Survey

Topic	Question (s)
<b>About You</b>	
	Name <i>(optional)</i>
	Contact Email <i>(optional)</i>
<b>Location (Optional)</b>	County drop down list
	Option to select Coastal, Rural and Urban
<b>Age (Optional)</b>	12 or under; 13-18; 19-24; 25-34; 35-44; 45-54; 55-64; 65-74; 75 and over
<b>Gender (Optional)</b>	<ul style="list-style-type: none"> <li>• Male</li> <li>• Female</li> <li>• Other (option to State)</li> <li>• Prefer not to say</li> </ul>
<b>Sector (Optional)</b>	<ul style="list-style-type: none"> <li>• Agriculture</li> <li>• Aquaculture</li> <li>• Arts and Entertainment</li> <li>• Board Member</li> <li>• Civil Service</li> <li>• Community and Voluntary</li> <li>• Consulting</li> <li>• Defence</li> <li>• Economic</li> <li>• Education</li> <li>• Energy</li> <li>• Engineering</li> <li>• Environment and Climate</li> <li>• Fisheries</li> <li>• Government</li> <li>• Health</li> <li>• Information Technology</li> <li>• Law</li> <li>• Local Government</li> <li>• Manufacturing</li> <li>• Marketing / Communications</li> <li>• Offshore Renewable Energy Developer</li> <li>• Public Sector</li> <li>• Regulatory</li> <li>• Research / R&amp;D</li> <li>• Retail</li> <li>• Retired</li> <li>• Shipping</li> <li>• Student</li> <li>• Supply Chain</li> <li>• Tourism and Travel</li> <li>• Transport</li> <li>• Volunteer</li> <li>• Unemployed</li> <li>• Other – please State</li> </ul>
<b>Organisation (Optional)</b>	Organisation Name
	Instruction: <i>If you are responding on behalf of an organisation, please tell us what organisation this is and how your answers to the questions were determined (e.g., consultation of staff members, senior management team input, team input, individual or other)</i>
<b>General</b>	Do you agree that the development of Offshore Renewable Energy in your local area is important to achieving Ireland's energy and climate targets?



**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

---

Do you agree that the development of Offshore Renewable Energy in your local area will deliver positive local economic, social, or environmental benefits?

**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

---

Do you agree that it is appropriate to have future development of offshore renewable energy guided by a plan-led model with greater State involvement, rather than being developer / project led?

**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

---

#### **Identifying Broad Areas of Interest**

A number of criteria have been used in the draft OREDP II to map areas technically suitable for offshore renewable energy and other factors and activities relevant to future planning. These are:

- Availability of localised datasets;
- Bathymetry / water depth;
- Proximity to electricity demand centres;
- Industrial opportunities;
- Proximity to existing / planned interconnectors;
- Supporting onshore infrastructure;
- Wind resource potential for floating offshore wind

Do you agree that these criteria can be applied to the process of identifying Broad Areas of Interest?

*Please see Section 11 of the draft OREDP II for more information.*

**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

---

Are there other criteria you think should be considered in identifying Broad Areas of Interest?

*Box for further comments*

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#### **Sharing our Maritime Space**

The draft OREDP II proposes that our maritime space can be shared, to encourage co-existence and co-location of offshore renewable energy and other maritime uses and activities. This is to maximise economic, social, and environmental benefits or uses of an area. Do you:

**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

Do you have any specific recommendations of how offshore renewable energy developments can share our marine space with other maritime uses and activities? (Tick as many as you wish)

- Aquaculture
- Boating
- Commercial Fishing including trawl, dredge, line, net, and pot fishing
- Community Facilities
- Cultural Activities
- Education & Training
- Ferries / Cruise Ships / Transport
- Heritage Conservation
- Marine Aggregate Extraction
- Marine Research
- Other water sports / leisure
- Shipping
- Species and Habitat Protection
- Tourism including eco-tourism
- Other – explain

*Outline your recommendations here:*

**Reviewing the OREDP II** Do you agree with the proposed approach to reviewing the OREDP II being every five years, at a minimum, with the evidence base for the OREDP II updated regularly?

*See section 12.1 of the draft OREDP II for more information*

**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

**Implementing the OREDP II**

An all-of-Government approach is proposed to ensure effective implementation of the OREDP II.

Do you agree with the Governance Structure proposed to oversee this process, i.e., Steering Group, Project Team of the Department of Environment, Climate and Communications (DECC), Geological Survey Ireland (GSI) and Sustainable Energy Authority of Ireland (SEAI) advised by both an Advisory Group and a Data & Scientific Group?

*Please see section 12.2 of the draft OREDP II for information.*

**Strongly agree**  
**Agree**  
**Neither agree nor disagree**  
**Disagree**  
**Strongly disagree**

**Data to consider**

In your view are the criteria that have been developed to assess data suitable for inclusion in the OREDP II, namely

- Relevance (i.e., within the remit of the OREDP II, important within the NMPF)
- Spatial relevance (i.e., relevant to the whole maritime area)
- Provenance (i.e., data that has passed quality checks)
- Accessibility (i.e., data is available and in a suitable format)
- Temporally Valid (i.e., collected within a relatively recent timeframe)

*Please see section 7.2 of the draft OREDP II for more information.*

**Yes**

**No**

**No opinion / N/A**

---

### **Environmental Reports**

In your view do the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) carried out to inform the draft OREDP II cover all relevant matters?

- **Don't know / did not read AA and SEA**
- **Yes**
- **No – explain**

*Box for further comments*

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### **Optional Additional information**

Please tell us any other relevant information regarding the Draft OREDP II e.g., implementation, management, future regional plans, etc.

*Open field for responses*

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## Appendix E – OREDP II Governance

### E.1 Steering Group

The Steering Group provides overall oversight and policy input to the OREDP II. It reviews and advises on outputs from the Data and Scientific Group and on recommendations from the SEA and AA work.

The Steering Group includes representation from the DHLGH (including NPWS), Department of Transport and Department of Rural and Community Development.

Under its Terms of Reference, the remit of the Steering Group was:

- To provide advice to DECC on the scope and overall approach to OREDP II.
- To advise on sectoral policies relevant to OREDP II.
- To review and provide feedback on the outputs from the Data & Scientific Working Group.
- To review and advise on recommendations made from the SEA/AA work.
- To provide input on the outcomes of public consultations at various stages of the process.
- To take a whole-of-government approach in identifying solutions to issues as they may arise.
- To review and provide input on the OREDP II report.

### E.2 Data and Scientific Group

The Data and Scientific Group undertook a data review and provided data relevant to the OREDP II process. It also advised on how to strengthen the data evidence base. The working group also provided expert input into on the data included in the GIS model. Members of the Data and Scientific Group include:

- The GSI
- The SEAI
- The DHLGH (including NPWS)
- The Marine Institute
- The Department of Transport
- EirGrid

The remit of the Data and Scientific Working Group was:

- To identify and provide relevant data to inform the offshore resource assessment
- To consider gaps in current knowledge/data and prioritise requirements
- To advise on constraints and opportunities from various sectoral perspectives relevant to ORE
- To provide expert input to the constraint model to be developed and which will identify future candidate areas for ORE development
- To engage with the consultants appointed to carry out the SEA/AA to ensure alignment and avoid duplication of work
- To review and provide input on the development of the OREDP II report

### E.3 Advisory Group

The Advisory Group includes stakeholders from the economic, environmental, and social and academic pillars who share expertise, knowledge, and local perspectives of relevance to the OREDP II plan-making process. DECC invited members of the MSP Advisory Group established as part of the NMPF process to participate in the OREDP II Advisory Group. Environmental organisations and industry representative bodies

were also invited to nominate up to three representatives to participate. Third-level academics and researchers with relevant expert knowledge relevant to the OREDP II were also invited to participate.

The Advisory Group Members include:

- Coastwatch Ireland
- Commissioners of Irish Lights
- County and City Management Association
- IBEC
- Irish Environmental Network
- Irish Maritime Development Office
- Irish Ports Association
- Irish Whale and Dolphin Group
- Killybegs Fishermen's Organisation
- MaREI - University College Cork
- Marine Renewables Industry Association
- National Offshore Wind Association of Ireland
- NUI Galway - Ryan Institute
- Queen's University Belfast
- Sustainable Water Network (SWAN Ireland)
- Irish South and East Fish Producers Organisation
- Irish South and West Fish Producers Organisation
- University College Cork
- University College Dublin
- Wind Energy Ireland

Under its Terms of Reference, the Advisory Group had the following key roles:

- To apply sectoral knowledge and expertise in reviewing the outputs from the Data & Scientific Working Group
- To identify additional relevant datasets to include in the analyses
- To help identify gaps in data and suggest priority actions to fill gaps
- To provide input on the constraints and opportunities for ORE off Ireland's coast, considering other maritime interests and activities
- To provide input on the model development and to review model outputs to ensure a comprehensive approach is adopted
- To review and provide input on the Draft OREDP II as it is developed