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EirGrid response to the Second Consultation on the Offshore Renewable Energy Development Plan

Dear Sir/Madam,

We write in response to the Department for the Environment Climate and Communications (DECC) public consultation on the Second Offshore Renewable Energy Development Plan (OREDP II) for Ireland. As Transmission System Operator (TSO), EirGrid develops, manages and operates the electricity transmission system in Ireland. More recently, as per the Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System, EirGrid has been designated as the system operator and asset owner of Ireland's offshore electricity transmission system.

EirGrid welcomes the publication of this comprehensive consultation and wholly supports the approach taken towards the enduring plan-led regime for developing renewable energy. EirGrid recognises the OREDP as one of the key building blocks of the future long-term model for the Offshore Renewable Energy (ORE) sector in Ireland as well as ensuring that the economic, environmental and societal benefits of ORE are realised for all by choosing the right offshore technology to use in the right places.

Through the Climate Action and Low Carbon Development (Amendment) Act 2021, the State has a long term commitment to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050. The OREDP II and the consequent developments in the ORE sector in Ireland are key factors required to achieve these commitments as well as meeting our future energy needs and enhancing our security of energy supply. It will also ensure protection of our marine environment, appropriate shared use of our seas and will aid the transformation of our economy and industry required to achieve the Government's offshore ambition as set out in the Programme for Government - Our Shared Future.

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Uimhir Chláraithe na Cuideachta | Company Reg No. 338522

Please see below for observations on some particular aspects of the consultation:

Consideration of Grid Capacity

We must recognise the different realities of the electricity system, the needs of society and the wishes of communities, as we transition to much higher levels of renewables. As well as continuing to focus on cost competitiveness and innovation, we must factor in macro level constraints and in particular grid capacity as we plan for our ambitions in ORE and our zero carbon future.

An approach whereby tens of additional gigawatts of offshore renewable connections are all working separately and individually towards connecting to an island power system is not an optimal solution and is unlikely to achieve Ireland's climate ambitions. A plan-led approach will co-ordinate the onshore and offshore transmission system with the potential to reduce infrastructure and minimise the associated environmental impact. It will allow us to take advantage of the whole of system synergies, e.g. locating renewable generation adjacent to load centres and locations with realisable grid capacity for renewable generation. It will also lead to a reduction in end-consumer costs as well as providing the opportunity for a co-ordinated and consistent public acceptance strategy covering multiple projects.

Scope of Electrical Transmission Infrastructure considered by OREDP II

We note that "consideration of cable routes and landing points are not in scope" (Section 6.1). The plan does not appear to state if offshore substation infrastructure is within scope and EirGrid proposes that it would be beneficial to clarify it in the final plan.

In addition, in Section 2.5.1, the Environmental Report states that "OREDP II considers the offshore windfarm array only, which includes requirement for inter-array cabling and offshore substation infrastructure". For clarity, it may be helpful to amend this to note that substations may be required both inside and outside the windfarm envelope and whether those outside the windfarm envelope are within scope.

Exclusion Zones in OREDP II

EirGrid welcomes the exclusion zone of minimum 750 m buffer (Appendix D) for all Offshore Renewable Energy (ORE) from existing and proposed interconnectors as agreed via the Data and Scientific Working Group. EirGrid suggests that a clarification to note stating that the actual separation distance between two subsea assets needs to be agreed appropriately on a case-by-case basis between the asset owners.

Designated Areas for Nature Conservation

EirGrid welcomes the commitment to integrate Marine Protected Areas both existing and new European sites (following Department of Housing, Local Government and Heritage (DHLGH) designations), and compliance with the forthcoming Nature Restoration law (est. 2024) into future updates of the plan, and lower tier assessments.

For information, EirGrid is actively developing specific policies to align with statutory and policy requirements on nature protection and restoration in preparation for its role as offshore developer under ORE Phases 2 and 3.

Strategic Environmental Assessment (SEA) Monitoring

In their second review of the Strategic Environmental Assessment (SEA) effectiveness in Ireland[1], the Environmental Protection Agency (EPA) declared that "monitoring remains the most significant gap in the [SEA] procedure". This gap poses a risk to plan-makers and developers, in that actual environmental effects may be poorly defined, and necessary policy or project-level changes are not implemented.

We welcome the governance architecture for monitoring, proposed Environmental Monitoring Programme and linked Data Action Plan and Research Integration Schedule and, if helpful, we refer to EirGrid's SEA-Related Monitoring Report[2] for our previous Grid Plan (2017-2022), published in 2023.

EirGrid Grid Implementation Plan 2023-2028

EirGrid is currently developing our next cycle Grid Implementation Plan 2023-2028; and have published the SEA scoping report[3]. Notwithstanding the exclusion of cabling from OREDP II scope, EirGrid will align marine development proposals as appropriate with OREDP II policies, the Potential Broad Areas identified, and future Designated Maritime Area Plans (DMAPs).

As we prepare the SEA monitoring framework for the next cycle plan, we will review the OREDP II SEA monitoring framework, and align where appropriate.

Environmental Subgroup

As part of our developing marine policy approach, EirGrid is committed to contributing to open data sharing to streamline marine environmental assessments.

Through environmental monitoring of construction and operation of offshore transmission infrastructure, EirGrid intends to increase the shared evidence base on

[1] https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/guidance-on-sea-statements-and-monitoring.php
[2] SEA-Related Monitoring Report
[3] SEA and AA of Grid Implementation Plans (eirgridgroup.com)

mitigation and nature restoration effectiveness in the marine environment. Sharing of such monitoring data will save on resources at a critical time in capacity building.

We note an Environmental Subgroup of the Implementation Group will be formed after publication of the OREDP II. EirGrid membership of the Environmental Subgroup may assist in identifying any effective collaborations or mutual benefits and ensure standardisation of EirGrid monitoring approaches with the proposed OREDP II Environmental Monitoring Programme.

SEA Environmental Report

Section 7

This section proposes suggested mitigations for lower tier assessments at Designated Marine Area Plan (DMAP) and/or project level. Table 20 identifies that "ORE DMAP proposals submitted to DHLGH will include a section outlining how the DMAP aligns with the principles and objectives of the OREDP II."

EirGrid welcomes the effective integration of mitigations between plans in this way (so-called 'tiering'). Noting the reference to project-level assessments in Section 7, it may be helpful to clarify if the measure in Table 20 also applies to project-level planning applications.

Section 7-5

EirGrid notes the statement in earlier Section 2.5.1 (and also referred to elsewhere) that "Export cabling, terrestrial infrastructure and/or grid connection requirements are not directly covered by the OREDP II", although considered in the cumulative assessment.

A minor inconsistency was identified in two cases where mitigations refer to export cabling. Also, we highlight the potential mitigation conflict regarding burying of cables.

Suggested project-level mitigations to mitigate EMF (Page 107) states: "Design cabling configurations and installation methods to minimize EMF field strength (Prioritise cable burial where possible)"

Suggested project-level mitigations to reduce underwater noise (Page 106) states: "Consider using alternatives (clump weights, gravity bases, routing cables through soft sandy sediment) rather than burial". If not stated, it may be useful to note such conflicting requirements may arise, with the optimal approach to cable protection to be determined considering the full range of environmental, technical, and economic factors.

Conclusion

EirGrid welcomes the opportunity to participate in this important consultation which is a major step towards the delivery of the Government ambition for at least 30GW

of ORE beyond 2030 as set out in the Programme for Government. We are fully supportive of the enduring centralised plan-led regime set out which is a critical component to a successful approach in meeting our climate ambitions.

We note the significant advantages of adopting this approach and in particular the co-ordination of the onshore and offshore grid, reduced costs and environmental impact as well as coordinated public acceptance processes. We must prioritise ORE in areas which are most beneficial towards meeting our renewable ambition and focus our efforts as an industry on delivering these.

EirGrid welcomes the recognition of the cumulative impact of policies which lead to related energy infrastructure such as transmission grid development and that these will require increasingly detailed consideration as planning and policy development continues. We also note the recognition that the OREDP II will be an iterative process, subject to regular review and management. Material changes may need to be reflected in further iterations of the Plan as technological advances, regulatory updates and grid access may alter the landscape of development.

EirGrid looks forward to other elements of work being developed by the DECC such as the updated Interconnector Policy and the Hydrogen Strategy which will further establish the enduring regime for ORE and serve as additional building blocks for leveraging the vast opportunities available to Ireland in offshore renewable energy.

We value the opportunity to continue working with DECC and other key stakeholders in the development and enhancement of the plans to harness Ireland's offshore energy potential.

Should you have any further comments in regard of this submission please contact the undersigned. We look forward to the outcome of this consultation and are available for further engagement as the plan continues to be developed.

Yours faithfully,

Doireann Barry
Head of Strategy and Sustainability

(Sent electronically)