RenewableNi

RENEWABLENI RESPONSE

Consultation on the Strategic Environmental Assessment (SEA) Environmental Report and Report to Inform Appropriate Assessment (RIAA)

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RenewableNI response to the Department for Economy's Offshore Renewable Action Plan (OREAP): Consultation on the Strategic Environmental Assessment (SEA) and Report to Inform Appropriate Assessment (RIAA)

Introduction

RenewableNI (RNI) is the voice for the renewable electricity industry in Northern Ireland. Through the development of policy, best practice, and public communications, we represent those engaged in wind, solar, and battery storage development. Our members make up a large majority of the renewable industry supply chain in Northern Ireland. Working in conjunction with Wind Energy Ireland (WEI), RNI is committed to driving policy to deliver zero carbon power on the island of Ireland by 2035 and offshore wind will be critical to achieving our net zero targets.

RNI welcomes the opportunity to respond to the Department for the Economy's (DfE) Offshore Renewable Action Plan (OREAP): Consultation on the Strategic Environmental Assessment (SEA) and Report to Inform Appropriate Assessment (RIAA) which is a vital first step towards identifying areas for the development of offshore renewable energy.

Policy context

The Climate Change Act (Northern Ireland) 2022 sets out a requirement to reach 80% renewable electricity by 2030 (80 by 30). Northern Ireland currently has 1.8GW of renewable capacity and must at least double this to meet growing demand. To date, onshore wind has been the key enabler with it providing 82.3% of the renewable electricity generated in Northern Ireland for the year ending June 2024[1].

However, offshore wind will play an increasingly important role in the region's energy future, with the Northern Ireland Energy Strategy Action Plan 2022 having set a target of 1GW of offshore wind from 2030. Furthermore, the Climate Change Committee estimates in its Fourth Carbon Budget[2] that Northern Ireland will need 5.5GW of renewable generation by 2040, to meet the rising demand resulting from electrification. Only offshore wind can deliver the extra capacity at the scale needed.

The exponential growth in offshore wind capacity in GB over the last two decades, largely attributable to the hugely successful CfD regime and continuous government support, demonstrates the potential for the sector to deliver real and significant progress towards net zero in NI when the right investment signals and policy enablers are in place.

Offshore wind also presents a major economic opportunity. As RNI's *The Clean Revolution* report[3] details, deploying 1.5GW of installed offshore wind by 2032 could mean powering 1.6 million homes and delivering up to £2.4 billion Gross Value Added.

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[1] Electricity Consumption and Renewable Generation in Northern Ireland: Year Ending June 2024 | Department for the Economy

[2] Northern Ireland's Fourth Carbon Budget - Climate Change Committee

[3] The-Clean-Revolution-–-Building-Northern-Irelands-Offshore-Wind-Industry.pdf (renewableni.com)

However, there is currently no indicative timeframe for a seabed leasing round, and as of yet, no indication as to how offshore wind will be supported. Developers will struggle to invest unless they can see a clear consenting pathway.

RNI understands that the conclusion of this consultation will be the catalyst to move towards an offshore leasing round, hopefully taking place in 2026. Offshore wind can deliver the scale of renewable generation capacity needed to achieve NI's decarbonisation targets and net zero goals, and it is critical the SEA and other enabling steps are completed at pace to facilitate 1GW of offshore wind from 2030.

We recognise the need for expediency to meet this target, but also the importance of getting enabling steps, such as the SEA and RIAA, competed to a high standard. Our response highlights areas within the SEA and RIAA for further clarification but we emphasise that this should not further delay progress towards a leasing round.

Q1: On the basis of the assessments conducted do you agree with the areas identified and proposed mitigation measures? If not, please tell us why.

Areas Identified

RNI maintains that the recommended resource zones are those which offer the most opportunity for the future development of offshore wind in Northern Ireland. RNI understands that the selected sites will be refined further by the Crown Estate (TCE) ahead of leasing, so it is vital that the recommended sites are the starting point.

The current scale of the refined sites would make the commercial viability of projects very challenging. Smaller sites will reduce interest from developers which will have a negative impact on the competitive tension of a future auction, leading to higher strike prices, and ultimately higher prices for consumers.

Additionally, RNI recommends that the Maximum Theoretical Capacities be used as a high-level estimation tool and that the actual capacities be driven from a site-specific standpoint. This approach recognises that:

- Developers are best placed to assess optimal build-out configurations, using the most efficient available technology.
- Technology changes quickly and turbine capacities are likely to have changed and become more efficient with the timescales associated with these sites.
- Fixed capacity targets based on theoretical maximums risk distorting project design, inflating costs, or compromising long-term efficiency.
- Offshore wind potential can be maximised, which is beneficial to help Northern Ireland reach its climate objectives.

RNI notes that TCE has decided to proceed with its Capacity Increase Programme to increase capacity of seven offshore wind farms and maximise the potential of existing offshore lease areas. All projects have seabed leases, grid connections and infrastructure. We were pleased to see that TCE has said that this programme is in the national interest due to the contribution towards the UK's 2030 clean power targets and decarbonisation of the electricity grid by 2035.

We are keen to see the same common-sense approach being taken in Northern Ireland from the outset of the leasing auction and route to market process.

Access to Shapefiles

RNI and many individual developers have requested that the shapefiles are provided for the recommended and refined resource zones to provide an accurate and robust response to this consultation. While we recognise DfE's position has been that it is unable to supply this data to date given the development areas are not finalised, we struggle to understand the reasoning underpinning this decision, particularly as this has been common practice in GB and ROI.

Access to a shapefile would ensure correct boundaries of areas are being used for an accurate assessment. It is common practice in plan-led markets (i.e., The Crown Estate, the Irish Government) to be supplied with a shapefile or a coordinate table. The alternative of georeferencing an image introduces accuracy errors due to several factors: coarse resolution of images, potentially different coordinate systems and lack of offshore control points.

Screening & Refinement

Whilst 6.1.2 describes screening and refinement of resource zones, the methodology used for assessment and recommendations for further refinement 6.1.3 seem to go beyond what would usually be done for an SEA and implies that spatial design is being considered as an iterative part of this SEA.

There is a lack of clarity around the process for the refinement of the recommended zones with 9.2 citing "recommendations for further refinement are provided for the RZs, where this may reduce the potential for significant effects on environmental indicators that have been identified". Additionally, page 11 of the RIAA references the OREAP Resource Zone Refinement Report, 2024 which is to provide a full description of the methodology associated with this process. However, this has not been furnished with these consultation documents and may have provided additional clarity regarding the the refinement process. We note TCE is forthcoming in publishing the data and methodology underpinned its refinement of sites and it is important that a consistent approach is taken across the UK.

Refinement of zones is critically important as a smaller leasing area for an offshore wind farm development may present a challenging business case due to several interrelated factors. Limited space will restrict the number of turbines that can be installed, reducing total energy output and making it difficult to benefit from sufficient economies of scale which are key to spreading fixed development and grid connection costs.

This is supported by research from the U.S. National Renewable Energy Laboratory (NREL), published in Applied Energy[4], which found that increasing both turbine and plant sizes significantly reduces the Levelized Cost of Energy (LCOE). Specifically, scaling from a 600 MW plant with 6 MW turbines to a 2,500 MW configuration using 20 MW turbines reduced the LCOE by over 23%, primarily due to savings in balance-of-system and operation and maintenance

[4] Shields, M., Beiter, P., Nunemaker, J., Cooperman, A., & Duffy, P. (2021). Impacts of Turbine and Plant Upsizing on the Levelized Cost of Energy for Offshore Wind. Applied Energy, 298, Article 117189. https://doi.org/10.1016/j.apenergy.2021.117189, https://doi.org/10.1016/j.apenergy.2021.117189

costs. Smaller lease areas also increase wake effects due to limited spacing between turbines, reducing efficiency and annual energy production.

Additionally, reduced design flexibility in smaller areas makes it harder to avoid geotechnical or environmental constraints, often increasing construction risks and costs. Despite their smaller capacity, grid connection costs can remain high, making the cost per exported megawatt less favourable.

From an investment perspective, larger lease areas make for a more compelling business case as they allow for scalable development, stronger project economics, and lower LCOE. These findings reinforce industry trends (as seen increasingly in GB), where large-scale offshore wind farms are preferred for their ability to deliver more competitive and sustainable energy solutions.

The irregular shapes of the Resource Zones could also cause challenges for site layout design when taken on by The Crown Estate to establish leasing zones. The Crown Estate has previously used a squareness ratio when shaping their areas to avoid irregular shapes.

Expedition of a leasing round

It is important to note that the initial scope of work for the SEA included a timeline for publication of the SEA in February 2024 and a twelve-week consultation period thereafter. Welcoming this publication in 2025, it is now imperative that timescales are expedited to enhance investor confidence and deliver on the economic benefits of offshore wind.

The spatial characterisation action within the OREAP is marked as complete; however, the offshore leasing zones have yet to be defined given that the consultation process for recommended and refined zones is still ongoing. It is likely to be Q4 2025 before any final zones are identified and TCE can work on its leasing zones. RNI would once again note that the design of a leasing round should not be stalled by the SEA consultation process and there is an expectation by developers that TCE is currently working on leasing parameters for NI.

The OREAP should reflect this TCE parallel workstream with some key milestones (e.g., publication of draft Terms and Conditions) to provide confidence to investors and expedite the timescales for a leasing round.

Part of an expedited process includes time saved on the other side of leasing for projects. RNI's view of future leasing rounds is that they should be aligned to a wider grid strategy and available capacity, include consideration of wake effects, and provide certainty to developers ahead of competition for award of seabed development rights.

Biodiversity, Flora and Fauna

At page 313, we suggest deleting 'and Offshore Habitats Regulations as it is covered by the preceding Habitats Regulations, "*...ensure compliance with the requirements of the Habitats Regulations" ~~and Offshore Habitats Regulations~~*

At page 317 in relation to '*Collision risks for birds, marine mammals...*", RNI would recommend referencing Predators and Prey Around Renewable Energy Developments (PrePARED[5]) and

[5] https://owecprepared.org/

Ecological Consequences of Offshore Wind research programme (ECOWind[6]) as the proposed mitigation in the SEA.

RNI suggests removing the following sentences as they are neither scientifically robust or appropriate mitigation: "project mitigation should consider that collision risks are elevated whenever devices are sited closer to shore or near to bird population areas on-land", and "on-demand turbine shutdown can also be considered if birds are detected within a certain safety perimeter".

Climatic Factors

RNI recommends that the climatic factors considered at page 323 are set within the context of The Draft Green Growth Strategy for Northern Ireland[7] which establishes a vision for green growth and sets out commitments to tackling the climate crisis. Central to the strategy is the mitigation and reduction of emissions and ensuring suitable adaptation and resilience measures are operational. The strategy lists high level principles, which include the principle to decarbonise through the replacement of fossil fuels with renewable energy, and the requirement to integrate this decarbonisation into policy making.

RNI would also propose referencing the Institute of Environmental Management and Assessment (IEMA) guide 'Assessing Greenhouse Gas Emissions and Evaluating their Significance[8]' instead of the proposed lifecycle assessment.

Material Assets – Existing Infrastructure: Cables and Pipelines

RNI suggest replacing 'Safety zones (e.g., 500m avoidance areas)' in Material Assets page 323 and throughout the report, with the following: 'cable separation distances of 250 m between adjacent pairs of cables'[9]. This is derived through the adoption of a cable spacing of 50 m between individual cables, a repair bight length of 200 m and an allowance for an additional corridor width of 50 m for future access to a repair bight.

Material Assets – Other Users: Military Activities

There are key considerations around mitigation identified that will require close collaboration with the Ministry of Defence (MoD). During the project planning phase, developers need to ensure that any mitigatory measures are deemed acceptable in consultation with MoD. Areas of known military importance should also be avoided during the next stage of consideration, prior to project development. MoD is noted as a key statutory consultee, but engagement is necessary well in advance of the consultation stage.

RNI would welcome if an NI specific MoD contact were nominated to engage, in a timely manner, with the offshore industry to discuss and agree proposed mitigation

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[6] https://ecowind.uk/projects/

[7] https://www.daera-ni.gov.uk/articles/green-growth-strategy

[8] IEMA - Launch of the Updated EIA Guidance on Assessing GHG Emissions - February 2022

[9] 2012, Red Penguin Associates, The Crown Estate Research, Cable Routing and Spacing Study. https://www.marinedataexchange.co.uk/details/TCE-3481/2012-red-penguin-associates-the-crown-estate-research-cable-routing-and-spacing-study

Section 3.2.7.5 states, 'The MoD is currently undertaking a review of the practice and exercise areas under byelaw and is also considering proposing new byelawed areas. No information is yet available on the location of proposed new byelawed sites." RNI would like to see a timeline from the MoD in relation to the location of the proposed new byelawed sites and potential impact on future offshore wind developments in Northern Ireland.

Cultural Heritage: Archaeology and Wrecks

The SEA proposes that mitigation should include "the conduction of site surveys or trial trenching before potentially damaging activities occur, with survey results informing further mitigation such as a relocation of the proposed activities to ensure sensitive seabed surface or subsurface features are avoided." This is potentially very costly mitigation, and it will be necessary to consider alternative and more cost-effective mitigation options.

RNI queries why engagement with the Department of the Environment Heritage and Local Government in the Republic of Ireland (see page 331) as a stakeholder is required for wrecks located in NI waters.

Landscape, Seascape and Visual Amenity

RNI would propose deletion of "developments occurring further offshore generally have lower visual impacts" and replace with the following or similar wording, "Northern Ireland's climate ambitions can only be achieved by a thriving offshore wind industry capable of delivering 1 GW from 2030. Due to the limited size of NI inshore waters, the location of projects in relation to potential Seascape, Landscape Visual Impact Assessment (SLVIA) effects should be considered on a project-by-project basis. Where significant effects are concluded as part of the EIA process, the reasons for proceeding should be included within the EIA. It is crucial that the SEA should not constrain delivery of NI's net zero and 1 GW targets.

Q2: Do you have any comments on the SEA Environmental Report?

Wind Turbine Tip Height Assumptions

RNI is concerned that turbine specifications included in the report do not reflect current industry norms or foreseeable future developments and may impact its conclusions on visual, spatial and cumulative impacts. In particular:

- "Commercial scale fixed offshore wind farms are commonly composed of horizontal axis wind turbines (HAWT), usually generating more than 8MW of energy; 12MW turbines have become commercially available since 2020" **Several examples wind farms using 14MW models are currently under construction.**

- "Typically, these turbines have an overall height of 80-120m, comprising a typical tower height of 60-80m, and a blade length of approximately 40m" **Examples under construction have tip heights up to 285m, rotor diameters up to 236m, and tower heights up to 175m. Rampion 2 Wind Farm off the coast of consented this year at tip height of up to 325m and a rotor diameter of up to 295m.**

We also note that the approximate turbine height for fixed wind turbines (maximum height to tip) has been taken as 165m (taking an average value from EIA reports and project websites for

37 projects that are within the maximum distance from shore that will apply for the OREAP; the range of heights was 80-291m).

Using average values from windfarm Environment Impact Assessments appears to have yielded a potentially falsely low turbine tip height for fixed, presumably due to a larger number of older projects with historically smaller scale turbines, compared to more recent floating projects using more current scale wind turbine technology.

RNI recommends the SEA refer to turbine models currently available on the market, as well as turbine models being deployed and in prototype phase. This will reflect turbines likely to be deployed during the 2030s when projects in NI will be commissioned.

Seascape Landscape Visual Impact Assessment

RNI would support the technology agnostic approach as proposed in Chapters 5 and 8 of the SEA.

However, as noted previously, we are concerned turbine specifications cited and buffer distances in Table 6.1 and Section 6.3 of the SEA Environmental Report are out of step with current industry trends, and therefore result in an impossible strategic environmental objective of 'No negative change, or a positive change in visual amenity or landscape/seascape character' when the forecast for fixed and floating technology from 2030 is 17-25MW machines.

Given NI's limited available seabed, turbines cannot be located a significant distance from shore. NI's climate objectives can only be achieved through the deployment of 1GW of offshore from 2030, and we urge DfE to acknowledge that some degree of visual impact is to be expected in order to realise the benefits of offshore wind.

As previously noted in our response, we recommend the location of projects in relation to potential SLVIA effects should be considered on a project-by-project basis.

Precautionary approach taken to Environmental Assessment of Resources Zones

The scoring applied throughout this section appears to be precautionary by default with a tendency to award scores of -3 (significant negative environmental effects) as standard, for Biodiversity, Flora and Fauna, during both Stages 1 and 2. Often this is associated with spatial overlap of receptors with tidal excursion zones associated with RZ and leads to suggested refinement at Stage 3.

The issue with this iterative OREAP/ SEA/RIAA approach and the aspirational refined resource zones reflecting this apparent high level of precaution is that it leaves minimal scope for much of the (what is already largely standard practice at project level) mitigation outlined in section 10 to be applied without compromising further notional project capacity, or for refinement at the leasing round stage. This could significantly impact the commercial viability of projects and ultimately OREAP objective delivery.

To ensure that this process does not result in a failed leasing round and/or an undeliverable project, RNI would strongly recommends that the recommended zones are used as the basis of a leasing round.

Technology Agnostic Leasing Round

Following the SEA scoping consultation the maximum depth for fixed bottom offshore wind increased from 40m to 80m, which is why there is a crossover between floating (50m +) and fixed zones.

The last Scotwind leasing round in 2022 was technology agnostic in relation to fixed and floating technologies. There are several deepwater sites where fixed bottom deployments are currently known to be planned, including bp's Morvan project (circa 75m) and Thistle Wind Partners (TWP's) Cluaran Deas Ear project (circa 70m). However, there is expectation within the industry that some of the Scotwind sites initially conceived as floating may ultimately elect to deploy fixed bottom solutions, depending on how floating technologies develop[10]. The renewable industry has a strong track record of evolving to match the demand of the developable areas, therefore a technology agnostic seabed leasing round for Northern Ireland gives the industry the best opportunity to deliver the most suitable offshore infrastructure.

Grid Connection

The SEA report states that "consideration of export cable routes and development of onshore infrastructure is not within the scope of the OREAP and is therefore not included in any detail within the SEA and RIAA assessments. However, the RZ assessments provided in Section 9 acknowledge the potential difficulties associated with connecting to the electricity grid in NI."

RNI maintains that a fundamental component of any assessment of the technical viability of offshore renewable energy must include a viable network connection with spatial constraints, proximity to load centres and robust transmission network should be considered.

RNI members' primary focus is on DfE's publication of an updated SEA to enable TCE leasing round to commence. However, it is critical that this leasing round does not focus solely on seabed. Grid planning cannot be disconnected from the seabed leasing process or final auction design.

Floating Offshore Wind

RNI suggests that Barge[11] floating wind platform is included in section 5.2.1.2 and the number of structures is increased from three to four types. Floating wind is a proven technology with numerous deployments globally. The Green Volt project has onshore and offshore consent and was awarded a contract for difference in September 2024 by the UK Government to deliver 400MW of floating offshore wind. It is targeting first power in 2029. Therefore, we would propose the deletion of, "floating wind turbine devices are a relatively new device type, currently still in the early stages of development" as detailed in section 5.2.1.2.

Furthermore, considering the nature of Northern Ireland waters and projects' closer proximity to shore, RNI would also recommend removal of the following text in section 5.2.1.2, "however, the associated maintenance of these devices may be more challenging compared to fixed wind

[10] Everoze (2023) Water Depth Limits for Fixed Bottom Offshore Wind. A review of the current state of fixed foundation technology. Confidential for Wind Energy Ireland.

[11] https://www.bw-ideol.com/en/technology

given their more remote locations and the potential for rougher sea conditions restricting access."

Fixed Irish Sea Inshore Resource Zones Assessment

A maximum negative score of -3 has been applied to Biodiversity, Flora and Fauna as part of the scoring process for the Recommended Resource Zones based, at least in part, on overlap of the theoretical tidal excursion zone (TEZ) with and a reef SAC designation. As is the case in the RIAA, no information has been provided on the methodology used to define these TEZs (e.g., the modelling approach and assumptions around: nature of surficial sediments; rate of sediment disturbance; trench dimensions; installation techniques modelled; suspended sediment concentrations; thickness of sediment deposition; duration of impact; sensitivity of habitat receptors etc.).

Additionally, it is not apparent whether any consideration has been given to the actual location of Annex 1 reef habitat with the SAC designation boundary. In the absence of such information, it is difficult to conclude whether the score applied is suitably justified or overly cautious.

Data gaps

The SEA states that "for some topics it proved difficult to obtain high quality data with a sufficient geographical distribution across the NI marine area, such as for areas of higher density or known importance for mobile marine mammals and seabirds, and areas of importance for inshore and offshore fisheries." RNI would point to the recent consultations on Seabird and Elasmobranchs Conservation in late 2024 (for both of which RNI submitted responses), as these consultations also noted a long-standing issue in data gaps and difficulties in establishing robust baselines for particular marine mammals and seabirds. RNI would hope that DfE is working closely with DAERA as it advances the work in these proposed strategies and that this combined resource can allow vital data gaps to be addressed.

The SEA also acknowledges that "data gaps remain for important fisheries areas" despite RPS providing survey charts to the NI fisheries representative bodies for distribution amongst their members, as part of this consultation. The responses from the members who were to identify areas of greatest importance were, according to the SEA, provided and considered during the assessment of the resource zones.

RNI would like clarification on why this important data was not able to be collated to a sufficiently high standard and the expected timeline for when such data will be available.

Q3: Do you have any comments on the Report to Inform the Appropriate Assessment?

Tidal Excursion Zones and Level of Precaution

The RIAA includes several recommendations to amend Recommended Resource Zones (RRZs) to ensure that their associated Tidal Excursion Zones (TEZs) do not interact with (spatially overlap) designated sites where there is considered to be a relevant impact pathway to qualifying interest features.

No information is provided on the methodology used to define these TEZs (e.g. modelling approach and assumptions around: nature of surficial sediments; rate of sediment disturbance; trench dimensions; installation techniques modelled; suspended sediment concentrations; thickness of sediment deposition; duration of impact; sensitivity of habitat receptors etc.). In

any case, the suggested amendments to the spatial design of RRZs based on uncertain theoretical impacts at a plan-level, in the apparent absence of applied consideration of impact extent, duration and severity in light of receptor sensitivity and tolerability, appears to be highly precautionary.

Plan-Level Mitigation

Section 5.6.1 of the RIAA suggests that (among other mitigation) the following plan-level mitigation should be included within the OREAP:

*"*All offshore renewable energy projects arising from the plan must undertake project-level HRA, during the development consent process, to fully assess the impacts and effects on European sites, their QIFs and COs and **must avoid adverse effects on European sites.**" (emphasis RNI's own).

The effect of this wording essentially removes the potential for the application of the HRA derogation process at a project-level, should it prove to be required for any reason (e.g. grid connection locations being dictated to developers that give rise to unavoidable adverse effects, or if there were conclusions of adverse effect on site integrity when projects are considered in-combination with other plans and projects, for example).

Whilst RNI in principle agrees with the sentiment and supports the inclusion of the requirement to apply the mitigation hierarchy in the suggested plan-level mitigations that follow, this wording could prove problematic at a project-level and we would suggest that less definitive, more pragmatic wording may better serve OREAP plan delivery.

Project-Level Mitigation

Section 5.6.2 contains several suggested mitigation measures that "should be adopted" at a project level that relate to the spatial design and layout of project components, for example: 'micro-site around sensitive features'; ' avoid areas of known contamination'; 'design arrays parallel to coastline'; 'spatial planning of array to minimise barrier effects'; and 'avoid siting devices in key sensitive areas'.

RNI would flag that the ability to adhere to many of these design mitigations will be constrained if the spatial scale of the final OREAP sites and lease areas offered to market by TCE isn't sufficient to accommodate such mitigatory measures while maintaining economically viable project capacities.

Refined Resource Zones

Section 5.5.12 states:

*"*The Recommended Resource Zones [...] will be taken forward for further consideration by TCE during the next stage of leasing assessment, with the acknowledgement that there are more focused, aspirational Refined Resource Zones as identified through the SEA and HRA.*"*

As stated previously, it is not clear to RNI how the HRA process described in the RIAA has influenced the spatial design of the Refined Resource Zones. Clarity is required given our concerns noted above regarding the level of precaution suggested relating to spatial overlap between designated sites and theoretical TEZs.

Statutory Consultees

Chapter 1 states, "statutory consultees were consulted on the scope and level of detail of information to be included in the SEA and HRA. The implementation of the OREAP has the potential for transboundary impacts and effects and therefore transboundary consultations

were also undertaken." RNI would suggest that the Isle of Man is also included as a statutory consultee.

In Combination with Other Plans or Projects

Article 6(3) of the Habitats Directive requires that in combination effects with other plans or projects, are considered as part of the HRA process. In combination with other plans or projects refers to the cumulative effects caused by plans or projects that are currently under consideration, together with the effects of any existing or proposed plans or projects. When impacts are assessed in combination, it can be established whether there may be, overall, an impact which may have significant effects on a European site or which may adversely affect the integrity of a site. The RIAA provides a list of plans and projects considered relevant which includes the draft Marine Plan for Northern Ireland (published in 2018).

RNI understands that offshore renewable energy development in the marine environment will work within the framework of DAERA's draft Marine Plan for NI, and once adopted, the Marine Plan for NI. The draft Marine Plan provides a framework of policies to be considered by public authorities taking decisions which affect or might affect the marine area through decision making processes. Public authorities have to consider the contribution of emerging technologies to regional and national policy objectives against potential adverse impacts. It is a **material consideration** in this regard (emphasis RNI's own). RNI would encourage DfE to work with DAERA to expedite publication of the finalised Marine Plan, as it is evident that this is a foundational document when considering future offshore development and particularly the issue of co-existence.

The process to be adopted by the OREAP and SEA is to be in line with the Marine Plan's guidance that "there is a presumption in favour of energy proposals that improve the security and diversity of energy supply, where it can be demonstrated: a) there will be no unacceptable adverse impact throughout the lifetime of the proposal on marine activities, uses and/or the marine area and any potential adverse impact is, in order of preference, avoided, minimised and/or mitigated; and b) restoration/decommissioning measures have been agreed, where necessary."

With respect to the issue of co-existence, paragraph 132 of the draft Marine Plan states that "the potential for some new and emerging technologies to co-exist with other marine activities and uses may not be fully understood and will require testing." RNI would ask to what extent this work has been undertaken and whether it is DfE or DAERA who has ultimate ownership of such assessments.

Q4: Do you have any comments on any of the areas which have not already been considered in supporting documentation. Please provide evidence to support your answer.

RNI welcomes publication of the February 2025 version of the OREAP which sets out a number of policy and legislative decisions and actions which are required to facilitate offshore projects in NI waters. It is important to now set firm timelines by which these decisions and legislative implementations will be completed. There are no commitments for the Department (or other stakeholders) to deliver on any actions beyond 2025, which is concerning given the (on average)

year development lifecycle of an offshore wind project. Clarification with specific milestone dates would give developers and project financers confidence to move forward with their projects against the challenging timescales set down in the OREAP.

The OREAP consultation document states that "depending on technology type and final assessments an estimate for potential offshore generation within the NI marine area would likely be between 1 - 4 GW. This assumption is based only on environmental assessments and further assessment is needed to assess both the commercial viability of the resource zones as well as the cumulative impacts of potential development within these areas."

RNI believes that the OREAP should commit to the setting of a higher long-term ambition once the results of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) are known. To realise the full potential of offshore wind in NI, a consenting pathway for the offshore region should also be considered.

The setting of a more ambitious target would mean long term visibility of an offshore wind project pipeline helping to create investment certainty which in turn drives supply chain investment and innovation to create alternative routes to market via green hydrogen for example. Supply chain companies will struggle to build the case to invest in NI without such a target and secure pipeline of projects.

RNI has outlined below where a future updated OREAP could include timescales, details and steps necessary to deliver on offshore wind ambitions in Northern Ireland up to and beyond 2035, which will make Northern Ireland's offshore wind market more stable and ultimately more attractive for developers and investment.

RNI would stress, however, that this revision of the OREAP is to more effectively facilitate the next steps of the critical path and should not delay the progress of the delivery of an offshore leasing round. We encourage DfE to work to amend the OREAP in parallel with TCE's work on the NI leasing auction design once this consultation exercise has been completed. RNI's comments have been set out in Table 1 below.

Table 1

A1 **Update of 2012 SEA/HRA**	Action A1 is associated with the procurement of a consultant to deliver on the SEA/HRA work. Whilst this action is completed, the updated OREAP should be an opportunity to reflect the actual status of the objective, namely that the SEA/HRA is out for consultation, and that this will inform an updated OREAP which then will allow the leasing process to commence. A new timeline for delivery of a leasing round should then be provided.
A2 **Align offshore renewable energy policy with marine-related environmental policy.**	A2 is based on a requirement for 'liaison' between DfE, DAERA and TCE and is not specific about how this activity will be carried out. This alignment between government departments is critical, as various other departmental policies including the draft NI Marine Plan, Biodiversity Action Plan and Blue Carbon Action Plan could have a significant impact on the location of leasing zones for offshore energy.

	Setting a date for a leasing round deadline is now critical to ensure that policy is aligned.
A3 **Establish and regularly engage with a group of wider stakeholders.**	This action is designated as 'ongoing' but there is no evidence to state specifically who these stakeholders are or, what engagement is ongoing. If this refers to the OREAP Steering Group which includes key stakeholders such as SONI, NIE Networks and RNI, we note that such a meeting has not been convened since December 2024. Moreover, no meeting of said Steering Group was coordinated prior to publication of the consultation or during the consultation period, to allow more effective collaboration with DfE at a critical juncture in advancing the OREAP. RNI welcomes the public consultation events scheduled for mid-May, however, these dates are relatively close to the conclusion of the consultation. Earlier engagement would have been useful.
B1 **Establish a decommissioning regime for Northern Ireland**	This has been marked as complete against an action of 'consultation on policy options for a decommissioning regime for offshore renewable energy installations.' RNI acknowledges that the consultation completed, but results from the consultation exercise have not been published and the regulatory regime has yet to be established. It has been made clear to RNI that legislation is crucial next step which underpins the leasing round, and there is considerable uncertainty in the sector as to when this legislation can feasibly be expected. Moreover, RNI would appreciate clarity from DfE as to whether this legislation (to be included as part of a wider Energy Bill to facilitate the Energy Strategy 2021) will have to have received Royal Assent for a leasing round to progress, or whether it will be sufficient that the legislative process has been significantly/meaningfully advanced. RNI would exhort DfE to provide a timescale for this legislation in the updated OREAP. RNI understands that a decommissioning regime is a crucial part of the process but maintains that TCE should be sufficiently confident that this issue is being progressed and will be resolved well in advance of projects being constructed. TCE should therefore be progressing the leasing round in parallel to this process rather than waiting for its completion.
B2 **An MoU between DfI/DAERA and DfE to prioritise offshore**	Planning delays and the judicial review system remain a significant concern for offshore wind developers and have the potential to radically hinder NI's ambitions to decarbonise the energy system. This action was a target for 2023 in the original OREAP but still has not been delivered.

renewable energy projects.	
B3 **Publish guidance on consenting regimes and marine boundaries for offshore projects in NI.**	We welcome the publication of a 2025 guidance document on consenting regimes and marine boundaries and would recommend that the Department considers using excellent templates from neighbouring jurisdictions as a starting point for e.g. Marine Scotland's *Consenting & Licencing Guidance for Offshore Wind, Wave & Tidal*
B4 & B5 **Deliver an offshore leasing round – spatial characterisation work to update SEA/HRA.** **Commence the design of future leasing for offshore wind.**	The spatial characterisation action is marked as complete however, the offshore leasing zones have yet to be defined as consultation process for recommended and refined zones is still ongoing. It is likely to be Q4 2025 before any final zones are identified and TCE can work on their leasing zones. RNI would once again note that the design of a leasing round should not be stalled by the SEA consultation process and there is an expectation by developers that TCE is working on leasing parameters for NI. The OREAP should reflect this TCE parallel workstream with some key milestones (e.g., publication of draft Terms and Conditions) to provide confidence to investors and expedite the timescales for a leasing round.
C1 **Strategic electricity network requirements – working group to consider offshore transmission arrangement out to 2050.**	RNI is encouraged that a a working group has been established (and this action has been marked as complete) however, the offshore transmission planning arrangements to accommodate offshore wind out to 2050 have not yet been established. Indeed, SONI was due to consult on planned onshore infrastructure to facilitate clustering of offshore wind in December 2024. RNI has been informed by SONI that this workstream will now not advance in the absence of a future Strategic Spatial Energy Plan. RNI would like to know how this has impacted DfE's work in this area and the OREAP. The OREAP should reflect the specific deliverables of this working group to instil confidence that further activity is planned. Offshore connection policy was to be in place by the end of 2023, which would determine who would own and operate the offshore transmission assets. RNI understands that DfE is obtaining a legal opinion to determine what offshore transmission arrangement will be feasible. It is possible that

	the offshore connection policy may require enabling legislation as part of the forthcoming Energy Bill, and RNI would ask that a timeline for the drafting of this be provided in the updated OREAP.
C2 Strategic electricity network requirements – determine the quantity of offshore capacity that will be targeted in the short, medium and long term.	The Strategic Energy Action Plan target of 'at least 1GW of offshore wind from 2030' is reflected in this published OREAP with a commitment to determining the actual capacity in 2025. RNI restates its position that areal target with a 'by' date, if even an interim target e.g., by 2032 is another key element to increase investor confidence and ideally this OREAP should have utilised the key outputs from the consultant's SEA work to set a reasonable target for the first leasing round.
D1 Provide a visible route to market – consult on a RESS scheme for NI.	RNI notes that this is marked as complete however the consultation related largely to the high-level design of the scheme and there was limited information relating to future offshore wind auctions (pot 2). DfE has also indicated that it may consider an alternative route to market for any future offshore wind auction. It is imperative that DfE now work closely with key stakeholders (particularly those in industry) to start to work on the design of the most suitable offshore wind auction for NI acknowledging the nuances of a small area of seabed, smaller number of projects and the resultant level of competitive tension. RNI is already looking at this question of auction design and hopes to be able to provide DfE with an industry position paper by end of Q2 2025.
D2 Publish a statement of intent with The Crown Estate	A Statement of Intent to work together on the design of a leasing round was published in 2023 (and hence this action is marked as complete) however, it does not go far enough with respect to setting deadlines for leasing. Representatives from the offshore developer sector (through the Northern Ireland Maritime and Offshore Cluster (NIMO) with an interest in the Northern Ireland waters met with Minister Archibald in March 2025 to request an update of this Statement of Intent to include for a committed timescale for leasing. The OREAP should include for an update of the Statement of Intent.
D3 Policy, schemes and awareness campaigns to	The date for completion of this action is 2025. There is undoubtedly a challenge ahead with respect to the capacity and capability of the workforce to deliver on offshore wind in

bring forward the skills and workforce for an offshore wind sector.	Northern Ireland and for the local supply chain to deliver on global opportunity. This action is absolutely necessary for DfE in conjunction with Invest NI and Renewable NI however, it is unclear what schemes, policies and awareness campaigns are being considered and the OREAP should outline a timetable for producing these.
D4 **Establish linkages with colleges, universities and industry to train a workforce and address skills shortages.**	Linkages with colleges and universities (and other organisations such as NIMO)) will be vital to the success of upskilling in the region. There is little evidence to show how this action (scheduled for completion in 2025) has been progressed to date and exactly what for the 'linkages' will take. The OREAP should be more explicit in outlining the steps to take in this important endeavour.
D5 **Policy approach to maximising local content in the offshore wind supply chain**	It is understood that the anticipated publication of the Northern Ireland Renewable Energy Support Scheme (later in 2025) will be entirely cost based (highest bidder wins) and the first auction (at least) will not include 'non-price criteria' (as other UK based auctions have in recent past). Local content is often a feature of qualitative based auctions (and leasing rounds) and boosting the local production of clean technologies is a key feature of the new EU Net Zero Industry Act (NZIA). NI is well positioned in terms of ports infrastructure and the facilities available at Harland and Wolff to maximise local content. As the representative of the renewable industry here in NI, we are committed to supporting the local supply chain. However, a date for development of an NI policy approach to maximise the offshore wind supply chain in the absence of a date for an offshore auction and with no evidence of offshore wind auction design having started, is very optimistic. The OREAP should be amended to reflect a realistic auction timescale with 'non-price criteria'. This would be aligned with other regional examples (such as the new EU NZIA) and the upcoming Clean Industry Bonuses in Allocation Round 7 in Great Britain to promote the economic development of the local supply chain.
D6 **Facilitate greater collaboration with the NI supply chain that**	The Northern Ireland Maritime and Offshore Cluster (NIMO) has been established (in 2024) to promote the supply chain in the sector. Key RNI members sit on the NIMO board and the OREAP should acknowledge NIMO as a positive outcome and

benefits everyone.	commit to working more closely to support this and other OREAP actions.
D7 Policy to bring forward public and private sector collaboration.	This action is set to be developed in 2025 in conjunction with UK government departments such as the Business, Energy and Industrial Strategy department (BEIS). There is disappointingly no update in the OREAP in terms of the change from BEIS to DESNZ and no evidence of progression towards this policy development.
D8 Working Group to identify policy necessary.	DfE has stated that a working group has been established (citing the relevant stakeholders) but there is no evidence of any outcomes from this working group in the form of routes to market assessment (e.g. green hydrogen). The OREAP should identify what policy measures have been identified and new steps to support the implementation of these measures.
E1 Establish regulatory change needed for offshore transmission assets.	Regulatory change is fundamental to the initiation of offshore wind in Northern Ireland and a programme for the publication of new legislation would be a welcome addition to the OREAP.
E2 Regulatory changes necessary for offshore energy connections to low carbon technologies and green hydrogen.	The date for completion of this action is 2025 however it is a lower priority than E1 and should not hamper progress of regulation for offshore installation and decommissioning of transmission assets.
E3 Regular review of legislative and regulatory framework	This is a welcome action. However, the mechanisms for, and frequency of, these reviews are unclear. The OREAP should include for more detail associated with this action.