National Strategic Objective Compliance Details

MUL application - Tonn Nua

ESB

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OUR VISION

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Document history

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Glossary

Term	Definition
Baseline Survey	Collection of initial environmental and technical data to characterise site conditions before development.
Embedded Mitigation	Standard measures built into project design and implementation to avoid or reduce environmental impacts.
Maritime Usage Licence (MUL)	Licence issued by MARA authorising activities in Ireland's maritime area, such as site investigation works.
National Climate Objective	Ireland's statutory target, under the Climate Action and Low Carbon Development Act 2015 (as amended), to transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy by 2050.
Offshore Renewable Energy (ORE)	Energy generated from offshore resources such as wind, wave or tidal power.
Zone of Influence (ZoI)	The spatial area over which the proposed SI works may exert ecological or environmental impacts.

Abbreviations and Acronyms

Abbreviation or Acronym	Meaning
CAP	Climate Action Plan
DMAP	Designated Maritime Area Plan
EEZ	Exclusive Economic Zone
EU	European Union
GW	Gigawatt
MARA	Maritime Area Regulatory Authority
MUL	Maritime Usage Licence
NBAP	National Biodiversity Action Plan
ORE	Offshore Renewable Energy
OWF	Offshore Wind Farm
REPowerEU	EU Plan to reduce fossil fuel dependence and accelerate clean energy transition
SI Works	Site Investigation Works
ZoI	Zone of Influence

1. Introduction

This statement addresses the overall need for the proposed site investigation (SI) works at the Tonn Nua site and their consistency with national and European strategic policy objectives, as required under Question 4.11 of the Maritime Area Regulatory Authority (MARA) Guidance Note for Applicants (August 2025).

The SI works are a necessary enabling activity for the design, consenting and delivery of a future offshore wind farm (OWF) at Tonn Nua. Offshore wind energy is a national priority for Ireland, underpinning statutory climate obligations, energy security, biodiversity integration, and European Union targets. Without comprehensive and reliable SI data, the project cannot progress to design, consent, or construction stages in a way that is technically feasible, environmentally sustainable, and policy compliant.

2. Strategic Context

The need for the proposed SI works must be understood against the backdrop of Ireland's and Europe's climate, energy, and biodiversity policy frameworks.

National Frameworks

- **National Marine Planning Framework (2021):** Establishes offshore renewable energy (ORE) as a strategic priority for national development and a key use of Ireland's maritime area.
- **Programme for Government (2020):** Identifies offshore wind as central to decarbonisation, energy security, and economic recovery.
- **Climate Action and Low Carbon Development (Amendment) Act 2021:** Creates a legally binding obligation for Ireland to achieve a climate-neutral economy by 2050, with a 51% reduction in greenhouse gas emissions by 2030.
- **Climate Action Plan 2024:** Commits to delivering at least 5 GW of offshore wind by 2030, with a further indicative target of 20 GW by 2040–2050.
- **South Coast Designated Maritime Area Plan (2024):** Explicitly identifies the Tonn Nua area as suitable for offshore wind development, thereby providing a policy mandate for preparatory works.
- **National Biodiversity Action Plan 2023–2030:** Requires biodiversity to be protected and integrated into all relevant decision-making, including marine infrastructure.
- **National Energy Security Framework (2022):** Calls for accelerated deployment of indigenous renewable energy to reduce dependence on imported fossil fuels.

European Frameworks

- **European Green Deal (2019):** Aims for climate neutrality in the EU by 2050, with ORE identified as a pillar of the energy transition.
- **REPowerEU (2022):** Calls for accelerated permitting and deployment of offshore renewables to achieve energy independence from fossil fuels, particularly in light of energy security concerns.
- **EU Offshore Renewable Energy Strategy (2020):** Sets a target of 300 GW of offshore wind capacity across the EU by 2050.
- **EU Biodiversity Strategy (2020):** Requires full integration of biodiversity objectives into renewable energy planning, including baseline ecological data.

Strategic Research Objectives

- **National Energy and Climate Plan (NECP) 2021–2030 (draft update 2023):** Highlights the critical role of applied marine research and data in enabling offshore renewables.
- **SEAI National Energy Research & Policy Insights (2023):** Identifies site-specific geotechnical, geophysical, and environmental investigations as a strategic research priority for successful ORE deployment.
- **MaREI Centre for Energy, Climate and Marine Research:** Calls for early-stage, site-specific investigations to improve consenting outcomes, reduce development risk, and ensure environmental sustainability.

3. Need for the SI Works

The proposed SI works at Tonn Nua are essential for several reasons:

- **Provide baseline environmental and technical data:** Collection of high-quality geophysical, geotechnical, metocean, benthic, marine mammal, and water quality data is fundamental to designing safe and efficient offshore wind farm infrastructure.
- **Enable statutory environmental assessments:** Robust Environmental Impact Assessment (EIA), Appropriate Assessment (AA) under the Habitats Directive, and Marine Strategy Framework Directive (MSFD) reporting all require site-specific baseline data.
- **Reduce consenting risk:** By identifying environmental sensitivities and technical constraints at an early stage, the SI works reduce the likelihood of delays, refusals, or costly redesigns.
- **Support policy delivery:** Offshore wind cannot be delivered to meet the 2030 targets without timely consenting and development, which in turn depends on SI data collected now.
- **De-risk investment and ensure cost-effectiveness:** Investors, policymakers, and regulators require certainty that project design is grounded in robust site-specific data.
- **Contribute to long-term national capacity:** Ireland's 20 GW+ ambition for offshore wind by 2040–2050 will depend on a steady pipeline of projects, beginning with South Coast DMAP developments such as Tonn Nua.

4. Strategic Fit

The proposed SI works are directly aligned with, and enable delivery of, Ireland's national and European climate, energy, biodiversity, and research objectives (Table 4.1).

Table 4.1: Alignment of SI works with strategic policy objectives

Policy / Strategy	Objective / Target	Alignment of SI Works
Climate Action and Low Carbon Development Act 2021	Legally binding climate neutrality by 2050; 51% emissions reduction by 2030	SI works are an essential enabling step for offshore wind, which is critical to meeting legally binding national climate obligations.
Climate Action Plan 2024	Deliver at least 5 GW of offshore wind by 2030	SI works provide the technical and environmental baseline needed to progress projects to consent and deliver within this timeframe.
South Coast DMAP (2024)	Identify and prioritise areas suitable for ORE	SI works are directly located in the Tonn Nua DMAP area and are therefore mandated by national spatial policy.

National Energy Security Framework (2022)	Reduce reliance on imported fossil fuels	SI works underpin the development of indigenous offshore renewables, strengthening resilience and energy independence.
National Biodiversity Action Plan 2023–2030	Integrate biodiversity into decision-making	SI works include embedded mitigation and ecological surveys, ensuring that biodiversity data informs project design.
National Marine Planning Framework (2021)	Recognise ORE as a strategic national priority	SI works are the first step in delivering offshore wind within the maritime spatial planning system.
EU Offshore Renewable Energy Strategy (2020)	Deploy 300 GW of offshore wind in the EU by 2050	SI works enable Ireland's share of the EU-wide offshore rollout, aligning with climate and energy targets.
European Green Deal (2019)	Achieve EU climate neutrality by 2050	SI works enable offshore wind development, which is a cornerstone of EU decarbonisation.
REPowerEU (2022)	Accelerate renewable deployment for energy independence	SI works de-risk projects and shorten consenting timelines, directly responding to the EU's call for accelerated permitting.
EU EIA Directive (2014/52/EU)	Require robust baseline data for impact assessment	SI works provide essential environmental data to meet EU legal requirements.
National Energy and Climate Plan (NECP)	Set national pathways for energy transition	SI works generate research and data that feed into the NECP evidence base and policy monitoring.
MaREI Strategic Research Objectives	Advance applied marine research to support ORE	SI works generate primary datasets of strategic research value for Ireland's marine and energy research community.

5. Conclusion

The proposed SI works at the Tonn Nua site are necessary, proportionate, and strategically justified. They represent the first enabling step toward the delivery of a future offshore wind farm within the South Coast DMAP.

The works:

- Provide the technical and environmental data essential for robust design and consenting;
- Directly support the delivery of binding national and EU climate and energy targets;
- Ensure biodiversity and environmental considerations are embedded from the earliest stage;
- Contribute to Ireland's long-term pipeline of offshore renewable energy capacity and to European strategic research objectives.

Accordingly, the proposed SI works are fully consistent with MARA Guidance (Q4.11) and with Ireland's statutory obligations under national and European law. Supporting technical assessments are provided in Attachments 4.1–4.10 of this application, which collectively demonstrate that the works are temporary, proportionate, and environmentally responsible.

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