



January 11th, 2021

**Submission, Part 2, to Department of Environment, Communications and Climate
concerning aspects to *Offshore Renewable Energy Development Plan 2***

The first Part of this Submission¹ established the development position of Floating Offshore Wind (FLOW) and, also, provided data in a chart form² of all known prospective Offshore Renewable Energy (ORE) projects. This Part deals with the issues around achieving 5GW deployed at sea by 2030. A final Part, concerning Marine Renewables Emerging Technologies, will be submitted presently.

1. Background

The first *Offshore Renewable Energy Development Plan*³ (referred to here as 'OREDP 1'), published in 2014 to cover an initial period of 2014-2020, was a comprehensive strategy for the development of Ireland's offshore energy resource. The Plan was informed by a Strategic Environmental Assessment which inter alia considered potential environmental impacts of scenarios for developing up to 4,500MW of offshore wind and 1,500MW of wave and tidal energy within the period to 2030⁴. Offshore renewable energy has moved along the pathway laid by OREDP 1 with the publication of the Climate Action Plan in mid-2019 with a target for ORE of 3.5GW deployed by 2030. This was later amended to 5GW by the Programme for Government in mid-2020. It had been intended by policy makers to develop an equally ground breaking successor Plan ('OREDP 2') to OREDP 1 during 2021 to deal with the coming decade's challenges and opportunities offshore.

The Government - notably the Departments of Environment, Communications and Climate (DECC) plus Housing, Local Government and Heritage (DHLGH) - are engaged in developing and implementing a complex framework of policy, legislation and studies to support the national offshore ambition. A concern is that, based on the experience of our developer Members in particular, ORE projects normally take about 9 years from conception to switch-on and, thus, the time envelope available to complete the framework and bring projects on-stream to meet the 2030 target is limited. Moreover, the framework must be comprehensive and ensure that the rights of all stakeholders are accommodated.

There are three policy priorities that must be taken into account to ensure that OREDP 2 is fit for purpose. The first priority is to fill out the 'framework' already referred to and this is well underway. Second, it is imperative that immediate steps are taken in OREDP 2 to revitalise the State's support arrangements for emerging technologies and this can be

¹ Submitted to DECC on 22/12/2020

² The latest update on this was sent to the DECC on 5/1/2021

³ *Offshore Renewable Energy Development Plan* Department of Communications, Climate Action and Environment, February 2014

⁴ Op cit, p27. See also Appendix

readily done by executing the recommendations of the *Interim Review* of OREDP 1⁵, published in mid-2018. This issue will be addressed in the final Part to this Submission to the Department shortly.

The most challenging immediate issue, however, is to set development priorities and a time frame for offshore wind projects required to meet the 2030 target.

2. ‘Potential Pathway’ to 5GW deployed by 2030 target

Our comments on the twin issues of development priorities and timeframes are informed by the most recent indication of DECC’s evolving strategic thinking on this subject:

Potential Pathway – Pipeline of Projects

❖ Relevant Projects – Developer Led

- Transition Protocol – projects advanced under Foreshore Act
- Expected to apply for MAC asap
- 5 Projects - 3,000MW of capacity
- MAC granted 2021 - Projects energise: 2026+

❖ Transition Stage Projects

- Selection of additional projects (approx. 3,000MW of capacity)
- Projects must be capable of being built and connected by 2030
- Limited to East/South (grid and technology)
- MAC granted 2022 - Projects energise: 2028+

❖ Future Projects – Enduring Regime – Plan Led

- Developed under a more plan led regime (policy and grid)
- Strategic sites selected on basis of OREDP2, SMAZ, MPS
- MAC granted 2023+ - Projects energise: 2030+

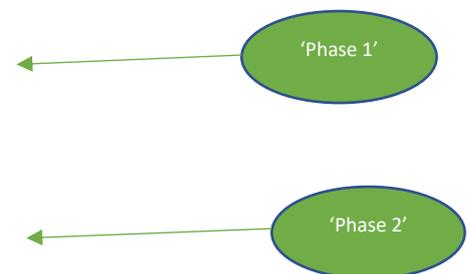


Illustration 1: Presentation by Department of Environment, Communications and Climate, November 13th, 2020 at workshop for industry.

The forthcoming *Marine Planning and Development Management* (MPDM) Bill will enable a discretionary power for the Minister for Environment, Communications and Climate to designate, following Government approval, Strategic Marine Activity Zones (SMAZs) for Offshore Renewable Energy (ORE). Once identified, SMAZs will be subject to a Strategic Environmental Assessment, Marine Planning Scheme etc. We are concerned that this process is not compatible with the tight turnaround time now required to deliver the 2030 ORE target of 5GW. A comprehensive Strategic Environmental Assessment was undertaken for OREDP 1 and this should form a strong basis for the new Plan. The pioneering work undertaken in OREDP 1 is illustrated in the Appendix.

The indications are that the Relevant and the Transition Stage Projects can make a major contribution to the 2030 target. However, it is critical that Maritime Area Consents (MACs) for these projects are issued as soon as possible e.g., Transition Stage projects will require a MAC by Q4 2021 or Q1 2022 in order to progress development for a 2030 delivery. See also our views below on the potential contribution of Enduring Projects to the 2030 target.

⁵ *Offshore Renewable Energy Development Plan (ORED) Interim Review* Department of Communications, Climate Action and Environment, May 2018

The Programme for Government indicates that offshore renewable energy developments off the east and south coasts will be addressed in the 2020s. As an Association, we have recognised the importance of this given the concentration of potential projects off those coasts and their technological readiness including in Floating Offshore Wind (which we dealt with in Part 1 of this Submission). Projects must be able to demonstrate a realistic route (e.g., access to grid, planning consent) to participation in a RESS auction (or suitable alternative for the project offtake) by 2025 and deliver by 2030. Where this can be demonstrated for projects off the west coast, consideration should be given to including them as part of Phase 2 projects. Projects should have a pathway to development, regardless of their location, if they can contribute to Ireland's 2030 targets. A developer-led approach will be crucial to this so that Government and developer resources can be harnessed in an effective fashion.

The scale, location etc of projects known to MRIA at present was illustrated in Part 1 to this Submission which has already been sent to DECC.

3. Concerns

Our understanding is that DECC is considering legal advice concerning the role which OREDP 2 should play with regard to the Relevant ('Phase 1') and Transition Projects ('Phase 2') in particular. As represented in the General Scheme of the *Marine Planning and Development Management* (MPDM) Bill, SMAZ designation is not mandatory⁶. It may be seen as an instrument which would enable DECC to move to a different ORE regime in due course, involving SMAZ designations, Strategic Environmental Assessments, Marine Planning Schemes for the SMAZs etc. However, other options can help meet the Government's immediate objectives rather than the prescriptive SMAZ route which risks stifling development and our potential to meet 2030 targets.

A number of concerns arise for MRIA:

- The well-informed view among the Association's developer community is that ORE projects take about 9 years from concept to 'switch on'. All of the *known* Projects (in all categories - Relevant, Transition and Enduring) are on the lower steps of the development ladder and are based on an independent, developer led model in which developers have selected sites they wish to investigate and, all other things being equal, to develop. Any delays to accommodate a new approach could be detrimental to the 2030 national target effort
- The precedent of the terrestrial track record in centrally led planning is not encouraging: the designation of a Cherrywood (Dublin) Strategic Development Zone (SDZ) commenced in 2008 and was completed in mid-2010; the associated Planning Scheme took a further two and a half years (December 2012) - almost 4 years in total; the record for the Poolbeg West (Dublin) SDZ was slightly better, taking just under 3 years! If a similar experience were to arise for ORE, none of the 'Transition' projects at least could be completed in advance of the 2030 deadline.

⁶ General Scheme *Head 21: Designation of Strategic Marine Activity Zones*

As a consequence of the approach just outlined, OREDP 2 would:

- Describe the process to govern the development pathway of the Phase 1 (Relevant Projects) and Phase 2 (i.e., Transition Projects plus Enduring Projects capable of delivery by 2030) projects. It is our view that the areas ('SEA Assessment Zones') identified in OREDP 1 should form the basis for the way forward. These have already been subject (in OREDP 1) to Strategic Environmental Assessment and updating this baseline work should be relatively straightforward. Any individual project brought forward in these areas will, of course, be subject to a robust Environmental Impact Assessment, Appropriate Assessment (where necessary) and public consultation
- Set out a time frame to identify zones (based on the decentralised model) for the Enduring Regime Projects (beyond those capable of contributing to the 5GW 2030 target), undertake a Strategic Environmental Assessment, recommend SMAZs etc.
- Set out a plan for support to the emerging technologies as outlined at 1. above and to be dealt with further in Part 3 to this Submission.

The alternative to the form of OREDP 2 outlined immediately above would be potentially significant delay to all Projects notwithstanding efforts to produce a 'fast track' OREDP 2 to facilitate, if deemed absolutely necessary for legal reasons, the inclusion of Relevant and Transition as well as appropriate Enduring (as outlined above) Projects within a decentralised model approach.

Early clarification is sought in regard to a number of other issues:

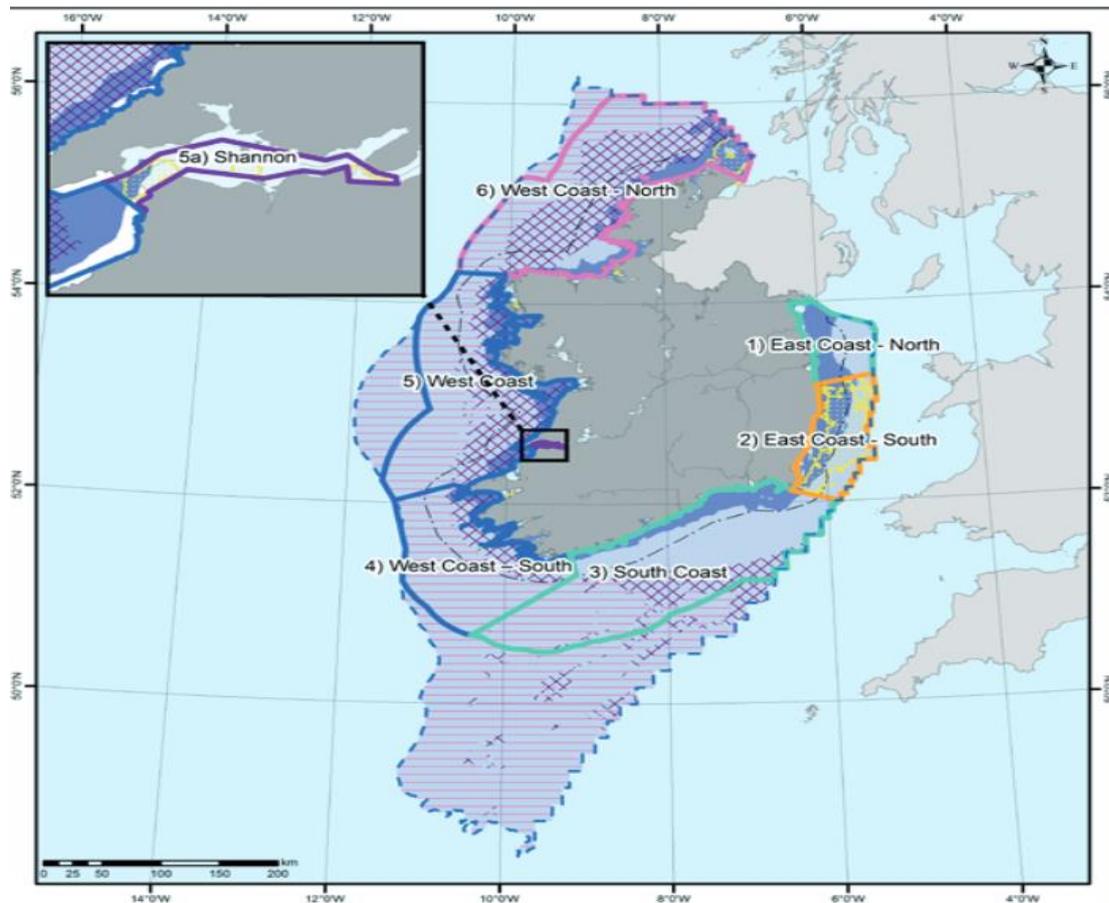
- Will developments *outside* of SMAZs be precluded once the decentralised model commences, whether applying to all Project categories from the outset or to the Enduring Regime projects alone? DHLGH indicated to a meeting of the MRIA Council in 2020 that such projects would be permitted. This aligns with the provisions of the Spatial Designation Process set out in the National Marine Planning Framework (Appendix D).
- The MPDM states that a process will be put in place to deal with competing Planning Interest/ MAC applications. This process will be important in helping to determine which projects are able to apply for consent. High level information on criteria for determining successful applications has been provided in the General Scheme. Further information is, however required e.g., how does the Department intend *in detail* to deal with the issue of two developers seeking a Maritime Area Consent for the same site?
- We understand that consideration of issues such as port development needs, skills etc will not be dealt with in either form of OREDP 2 already outlined due to time constraints. Nonetheless, we are concerned about the provision of supporting infrastructure to enable ORE. We will undertake our own review of the basic investment 'ask' that may be involved, initially concerning the south coast, during Q1 and communicate further with the Department. It is noteworthy that the UK will invest £160m sterling in UK offshore wind ports and infrastructure to achieve its

target of 40 GW of offshore wind by 2030, Prime Minister Boris Johnson announced on October 6th, 2020.

- The SEA undertaken for OREDP 1 expressly took into account existing applications for offshore renewable projects which were awaiting determination at the time the Plan and corresponding SEA were prepared. This should be made clear in the final SEA prepared for the National Marine Planning Framework (NMPF) and OREDP 2 as appropriate. Individual projects will still be required to undergo a detailed and project-specific Environmental Impact Assessment (and other Assessments where necessary). Relevant Projects, as defined under the transitional protocol (and the consented Arklow Bank Wind Park Phase 2), should therefore be considered for the purpose of the NMPF and future OREDP 2 as potential existing developments.

Appendix

SEA Assessment Zones and findings in OREDP 1



Strategic Environmental Assessment zones employed by OREDP 1. *Source:* OREDP 1

Assessment Area	Total amount of development (MW) that could potentially occur within each assessment area without likely significant adverse effects on the environment (taking into account mitigation).				
	Fixed Wind (MW)	Wave (MW) 10 to 100m Water Depth	Wave (MW) 100m to 200m Water Depth	Tidal* (MW)	Floating Wind** (MW)
1: East Coast (North)	1200 to 1500***	–	–	–	–
2: East Coast (South)	3000 to 3300****	–	–	750 to 1500	–
3: South Coast	1500 to 1800	–	–	–	6000
4: West Coast (South)	600 to 900	500 to 600	3000 to 3500	–	5000 to 6000
5: West Coast	500	5000	6000 to 7000	–	7000
5a: Shannon Estuary	–	–	–	Limited potential	–
6: West Coast (North)	3000 to 4500	7000 to 8000	6000 to 7000	750 to 1500	7000 to 8000
Total Development Potential (MW) (without likely significant adverse effects)	9800 to 12500	12500 to 13600	15000 to 17500	1500 to 3000	25000 to 27000

OREDPP 1 view of development potential *without* adverse environmental impact. *Source:* OREDPP1