



Marine Renewables Industry Association Submission

**NATIONAL MARINE PLANNING FRAMEWORK
CONSULTATION DRAFT**

April 24th, 2020

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1. Introduction

The Marine Renewables Industry Association (MRIA) represents the Marine Renewables Emerging Technologies (MRETs) of wave, tidal and floating wind on the island of Ireland. More details may be found at www.mria.ie.

The Association supports the effort being mounted by the Department of Housing, Planning and Local Government (DHPLG) to advance a National Marine Planning Framework (NMPF). It is a vital element in developing our vast marine energy resource which could have transformational economic effects over the coming decades. There is scope, for example, for at least 22GW of offshore (mostly floating) wind energy by 2050 in Irish waters¹, not to speak of the enormous potential impact of our huge west coast wave resource.

We have welcomed the opportunity to participate in the marine spatial planning consultative process, of which the current *National Marine Planning Framework Consultation Draft*² (referred to hereinafter as the **Consultation Draft**) is the latest manifestation. MRIA's earlier views on marine spatial planning are contained in our submission to an earlier consultation³ on the NMPF and in a major research paper⁴; both of which are available at www.mria.ie.

Overall, the Consultation Draft represents a positive start to marine spatial planning in Ireland and generally is in keeping with the '...overarching principles and high-level priorities...' for Ireland's marine planning system set out in the *Marine Planning Policy Statement*⁵. Strikingly, the Consultation Draft involves the marine related policies of a disparate group of Government Departments and agencies expressed against a common template. Not surprisingly at this stage, it reveals inconsistencies of tone and emphasis among the various bodies in areas of overlap. Revealing this in itself should drive better co-ordination over time between the 'silos of State'. One clear omission is the failure to give explicit recognition to the huge challenge posed across the marine board (including the NMPF) by the need to build up the skills and education levels required to support and prosper from the coming offshore revolution.

The State is working on a complete overhaul of the policy and legislative framework which applies in the maritime domain. The National Marine Planning Framework is linked to the emerging consenting legislation (*Marine Planning and Development Management - MPDM* -

¹ www.windeurope.org/about-wind/reports/our-energy-our-future/#explore, figure 18

² *National Marine Planning Framework Consultation Draft*, Department of Housing Planning and Local Government, 2019. www.housing.gov.ie/sites/default/files/public-consultation/files/draft_national_marine_planning_framework_final.pdf HEREINAFTER REFERRED TO AS 'CONSULTATION DRAFT'

³ *Submission to Public Consultation on the National Marine Planning Framework Baseline Report*, 2018 www.mria.ie/site/assets/files/1016/mria_submission_to_national_marine_planning_framework_consultation.pdf

⁴ *Marine Spatial Planning Needs of Marine Renewables Emerging Technologies Discussion Paper*, 2018 MRIA www.mria.ie/site/assets/files/1016/marine_spatial_planning_needs_of_marine_renewables_emerging_technologies.pdf HEREINAFTER REFERRED TO AS 'MRIA DISCUSSION PAPER'.

⁵ https://www.housing.gov.ie/sites/default/files/publications/files/marine_planning_policy_statement.pdf

p8. The MPPS was published in 2019 as a draft and reportedly may have to be updated and reissued prior to the new consenting legislation coming in to force.

Bill), the redefinition of maritime boundaries (*Maritime Jurisdiction Bill*) and other instruments such as the *Marine Planning Policy Statement*.

The comments, suggestions and observations made in this Submission are focused on the NMPF but inevitably, in places, they spill over onto other elements of the Irish maritime tapestry now being woven.

2. Progress on previous issues

MRIA expressed concern previously about three issues arising from the then indicated approach⁶ to the NMPF. The progress since on each of these (as reflected in the Consultation Draft) is noted below. An important point is that these views were originally expressed by MRJA when, at most, a target of 55% RES-E by 2030 was contemplated. It has, of course, since been set by the *Climate Action Plan*⁷ at a much higher level, 70%.

- *Zoning*: The Consultation Draft notes a new approach to Zoning proposed by the latest 'General Scheme' of the MPDM and MRJA will comment in detail on this further when the final version of the MPDM is put out to consultation⁸. Suffice it to say at this stage that the approach planned is broadly welcome: the MPDM will enable Ministers to seek Government approval for the designation of Strategic Marine Activity Zones (SMAZs) within which specified activities (such as offshore renewable energy projects) may then take place.

There is still work to be done to clarify and to tease out the two proposed approaches to offshore renewable energy SMAZs - the 'developer led' and the 'centrally planned' approaches. We welcome the acknowledgement in the General Scheme of the MPDM Bill that a centralised approach may not be feasible or appropriate in the initial stage of offshore renewable energy development. We believe that a decentralised approach to development is crucial to allow for an offshore renewables industry, at first involving just wind energy, to become established quickly in Ireland.

- *Partnership*: The Association is firmly of the view that the development of marine renewables in Irish waters will turn to a significant degree on successful partnership with the interest groups and communities affected by offshore energy developments. We are concerned - see later - about an aspect of policy development in this regard.
- *Data and Ports*: Progress is reportedly being made on the need to co-ordinate and improve data sets relating to marine matters. Port requirements have recently⁹ been

⁶ See *Submission on Baseline Report* and *MRJA Discussion Paper* referenced earlier

⁷ *Climate Action Plan to tackle climate breakdown*, 2019 Department of Communications, Climate Action and Environment (DCCA)

⁸ The draft MPDM Bill is reportedly near to completion but will require approval by the incoming Government and will then be published for consultation. Given that Government formation was still in train, at the time of publication, it is possible that this consultative process will extend until year end.

⁹ *Irish Maritime Development Office IPORES 2018A Review of Irish Ports Offshore Renewable Energy Services, 2018* IMDO [www.imdo.ie/Home/sites/default/files/IMDOFiles/13390 IMDO IPORES Report 2018 FA.PDF](http://www.imdo.ie/Home/sites/default/files/IMDOFiles/13390%20IMDO%20IPORES%20Report%202018%20FA.PDF)

reviewed *again* but without addressing the long-held MRIA view¹⁰ that early planning should commence on providing extra port facilities, perhaps even a new port, on the west coast to cater for the highly-likely development of significant wind and wave resources there from the late 'twenties onwards. Half of the 'Port, Harbours and Shipping' objectives in the Consultation Draft refer to dredging and waste disposal¹¹! There was a report at a recent webinar, hosted by the Department of Housing, Planning and Local Government on the Consultation Draft, that a new ports policy is envisaged and this is to be saluted.

Overall, it must be borne in mind that marine spatial planning - in Ireland, the NMPF - is relatively new with international examples still evolving. There is no proven and 'right' approach to it, at least not yet. Even the well-regarded Dutch marine spatial planning system, which seems to have influenced the Irish approach, has its critics¹². Consequently, the intention to review the Irish National Marine Planning Framework just six years (c2026+) after its planned initial adoption should facilitate the incorporation of practical 'lessons learned' and is to be welcomed.

3. Offshore renewable energy and the NMPF

Ireland's *National Policy Position*¹³ on climate change set the objective of achieving a transition '.... to a low carbon, climate-resilient and environmentally sustainable economy by 2050'. This goal inter alia involves '... an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors.' This position was captured in law by the *Climate Action and Low Carbon Development Act, 2015*.

In keeping with the *National Policy Position*, the NMPF outlines OVERARCHING MARINE PLANNING POLICIES (OMPPs) which apply to all proposals for development and SECTORAL MARINE PLANNING POLICIES (SMPPs) which apply to specific strands of activity¹⁴.

Offshore renewable energy developments are consistent with the HIGH LEVEL OBJECTIVES¹⁵ set by the NMPF:

- ENVIRONMENT- OCEAN HEALTH: offshore renewables particularly link to the 'policy groupings' concerning air quality and climate change;
- SOCIAL- ENGAGEMENT WITH THE SEA: the range of policy groupings (n.b. Air Quality and Climate Change) is consistent with offshore renewables

¹⁰ <http://www.mria.ie/documents/c4a46712f4cf756fb277c60bc.pdf>

Maritime Infrastructure Development Priorities to Support Ireland's Future Ocean Energy Industry Discussion Paper, 2014 MRIA

¹¹ *Consultation Draft*, p141-3

¹² *MRIA Discussion Paper* section 4.4

¹³ *Climate Action and Low-Carbon Development National Policy Position Ireland*, DCCAE 2014

[www.dccae.gov.ie/en-ie/climate-action/publications/Documents/5/National Climate Policy Position.pdf](http://www.dccae.gov.ie/en-ie/climate-action/publications/Documents/5/National%20Climate%20Policy%20Position.pdf)

¹⁴ Although, as referred to elsewhere in this Submission, a more integrated approach would be desirable in future NMPF cycles

¹⁵ *Consultation Draft*, p26

- ECONOMIC- THRIVING MARITIME ECONOMY: offshore renewables are appropriate to both policy groupings, Co-existence and Infrastructure

The SMPP relating to renewables, ENERGY-OFFSHORE RENEWABLE ENERGY¹⁶, is supportive of the sector and it has set objectives which seek to:

- ‘...support the establishment of Ireland as a world leader in offshore renewables deployment’
- ‘... support Ireland’s decarbonisation journey’
- ‘... provide enhanced security of supply for Ireland...’
- ‘...ensure good regulatory practices in offshore renewables development’. Ensuring good regulatory practice in line with international best practice is essential if Ireland is to establish itself as an attractive and competitive offshore market.

We particularly welcome the OFFSHORE-RENEWABLE ENERGY (ORE) PLANNING POLICIES¹⁷ in the Consultation Draft which aim to support proposals that can meet Ireland’s *Climate Action Plan* target of at least 3.5GW of offshore wind (thus getting offshore renewables up and running off Ireland which is in the direct interest of the emerging technologies such as wave and tidal) by 2030; give preference to ORE projects in designated zones and ensure alignment between land and marine planning.

4. Emerging marine renewable energy technologies

The Draft Consultation recognises the emerging technologies (wave, tidal and floating wind). In particular, we welcome ORE Policy 5 and ORE Policy 11:

ORE Policy 5: Proposals for activity that may adversely impact ORE test projects by virtue of being within or adjacent to ORE test sites, or between site and landfall of ORE test projects that may adversely impact ORE test site projects, should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts.

ORE Policy 11: Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains, will be supported.

Ensuring that ORE test facilities can continue to operate effectively is of critical importance. We welcome the protection that this policy seeks to give them. Supporting emerging renewable energy technologies and associated supply chains is essential if Ireland is to be a world leader in offshore renewable energy, achieve 2030 targets and ensure Ireland is on a pathway to deeper emissions reductions out to 2050.

Ireland has developed experience and expertise in the marine renewables emerging technologies of wave, tidal and floating wind, reflected in the ongoing investment in test facilities and sites at the LiR National Ocean Test Facility in Cork, SmartBay in Galway and AMETS in Mayo. Our national interest in test facilities stems, first, from an industrial point of

¹⁶ Ibid, p119-125

¹⁷ Ibid, p119-120

view - Ireland is one of the ‘early movers’ in a new industry and has ambitions to become a global supply chain base for the new technologies. It also reflects the fact that Ireland has a vested local interest in seeing the early development of floating wind technology and of wave technology. As is well documented, Ireland has a huge wind and wave¹⁸ resource and the technology to harness them is important to meet both domestic renewable energy targets and also to address substantial electricity export opportunities with associated job and income creation. Moreover, Ireland is home to several leading tidal energy device developers e.g. Tidal Flyer.

While we welcome the approach of the Draft Consultation to test sites, we believe that more prominence should be given to emerging technologies in the final NMPF. This would be in line with the *Climate Action Plan* which highlights that Ireland has a ‘...long-term potential of 70GW of ocean energy opportunity (wind, wave and tidal) within 100km of the Irish coastline’¹⁹. It is recommended too that the final NMPF expand on the importance of test sites and how they link in to marine spatial planning and to our national offshore renewable energy ambitions. It is important also to recognise that the current sites may need to evolve as technologies mature and that there is a distinct likelihood that further sites (temporary and/or permanent) may be required to test novel airborne and low current flow devices.

5. Social - landscape and seascape

MRIA is concerned about the Draft Consultation’s approach in regard to two aspects relating to ‘Seascapes’: the apparent lack of sufficient priority being given to the task of developing impact guidelines and, second, the apparent conflict in some parts of the Draft Consultation between 1. an ostensible aim to preserve de facto the *existing* position for coastal communities and 2. the State policy-aim reflected elsewhere in the Draft Consultation - to develop offshore renewable energy.

➤ 5.1 SEASCAPES GUIDELINES

MRIA’s past work²⁰ in the area of marine spatial planning expressed the Association’s concern about the possible public reaction to the presumed impact of offshore renewables. In doing so, we are cognisant of the excellent community relations being generated by early developers such as SSE Airtricity and Parkwind in respect of their planned projects.

Our intention is not to influence policy makers in favour of any technology category - MRIA supports all of them and believes that the fortunes of wind, wave and tidal energy are linked - but rather to ensure that the common challenge is identified and dealt with as a priority from the outset.

¹⁸ Our tidal resource is largely confined to the north east of the island, around the Antrim coast.

¹⁹ *Climate Action Plan* op cit, p58

²⁰ E.g. MRIA *Discussion Paper*

The Draft Consultation deals positively with impact issues at two points. First, a statement of policy is made:

ORE Policy 9²¹: A permission for ORE must be informed by inclusion of a visualisation assessment that supports conditions on any development in relation to design and layout. Where a development consent is applied for in an area already subject to permission, proposals must include a visualisation assessment to inform design and layout. Visualisation assessments must demonstrate consultation with communities that may be able to view any future ORE development at a given site with the aim of minimising impact. Visualisation assessments will be informed by specific emerging guidance but in absence of this should include elements identified in related policy and good practice

But, second, there is a commitment without a timeframe to the development of statutory guidelines for visualisation assessment:

.....the Department of Housing, Planning and Local Government, working with the Department of Communications, Climate Action and Environment and other stakeholders, will develop statutory marine planning guidelines to support best practice throughout the planning process for ORE, including the development of a specific visualisation assessment in relation to design and layout of proposed developments. These guidelines will, inter alia, provide that where a development consent is applied for in an area already subject to permission, proposals must include a visualisation assessment to inform design and layout. Visualisation assessments must demonstrate consultation with communities that may be able to view any future ORE development at a given site with the aim of minimising impact. In absence of statutory marine planning guidelines to inform visualisation assessments, related policy and good practice include local landscape character assessments in coastal areas (for example Cork and Galway). The National Planning Framework (National Policy Objective 61) sets out an ambition to develop a National Landscape Character Map and this should be referred to when available²².

In contrast to the Department of Housing, Planning and Local Government's planned initiative to develop a dialogue between the offshore renewable energy and the fishing industries (see later), there is no indication at present of top priority also being given to the issue of preparing guidelines for visualisation assessment²³.

We recommend that DHPLG resource and convene urgently, even in a virtual form in these Covid19 times, an expert group to design the guidance on visual assessment which is referenced in Appendix F of the NMPF. This should be a priority task for 2020 and it should

²¹ Consultation Draft, P120

²² Consultation Draft, P123

²³ Although work, led by the Marine Institute, is in train about seascape characterisation

not preclude facilitating those projects where...’ *a development consent is applied for in an area already subject to permission...*’. Such cases can be dealt with as proposed in ORE Policy 9: ‘... proposals must include a visualisation assessment to inform design and layout’²⁴.

➤ 5.2 SEASCAPES: CONSISTENCY OF POLICY APPROACH

Overall, the NMPF, as currently drafted, is supportive of offshore renewables and the maritime economy in general. The sector by sector layout of the document may encourage a restricted and conventional reading which is what marine spatial planning ultimately seeks to overcome but, perhaps, the layout is inevitable in the initial Framework. Hopefully, a more integrated approach will be a feature of future iterations of the NMPF.

The section on ‘Social Benefits’²⁵ eloquently advocates the social benefits associated with coastal living which arise from factors such as ‘... *residing near the coast, with views of it, experiencing it in all weathers and seasons...*’ and so on while those who do not live nearby ‘...*may also gain social benefits through virtual experiences or just having confidence in its sustainable management*’. The section continues in the same vein and could be interpreted as a policy statement in favour of the status quo with, e.g. social benefits being ‘... *derived indirectly*²⁶ *from people gaining marine area-related employment and skills.*’ It does not even mention offshore renewables as a sector that could contribute to the realisation of social benefits.

Given good planning (now underway through the NMPF and other instruments), offshore renewables could be the source of many thousands of new jobs, notably in coastal communities, by the early 2030s. This requires a corresponding uplift in those national entities and companies involved with maritime training and education such as *Bord Iascaigh Mhara* (BIM) and private firms but, above all, by the *National Maritime College of Ireland*, one of Europe’s leading maritime institutions.

The NMPF is, by its nature, a very complex Framework which must take account, where possible, of different sectoral interests and points of view. It will, when finalised by Government, become a policy of overarching importance in the maritime world, particularly in the regulatory sphere.

It is important that the NMPF reflects a fair balance throughout between the maintenance of the environment, the welfare of coastal communities and interests and, on the other hand, the national imperative to develop offshore renewables, albeit in a manner that goes as far as possible to accommodate the needs and sensitivities of other sectors and communities.

As currently drafted, the section on ‘Social Benefits’ might be interpreted as being in conflict with the section on ‘Energy - Offshore Renewable Energy’ with unintended consequences.

²⁴ *Consultation Draft* p120

²⁵ *Consultation Draft*, p82

²⁶ Underlining by MRIA for emphasis

MRIA urges that it be reviewed and be redrafted to reflect a more balanced approach, in the light of the above comments, before a final NMPF is placed before Government.

MRIA believes that guidance needs to be provided as a matter of urgency on how consenting authorities will weigh-up public benefits and impacts on seascape and landscape. Guidance may help overcome potential issues which may arise in this area and would provide clarity to developers seeking to bring forward projects.

6. Partnership

The Association has, from the outset of the national marine planning exercise, placed an emphasis on the need to develop a successful relationship-based engagement with the interest groups and communities on whom the industry may impact²⁷. Marine renewables need a *Social Licence to Operate*²⁸ (SLO), as do other industries and interests. The key point to bear in mind is this: a Social Licence to Operate is an outcome and not a process and many different ways may be used to achieve an SLO.

In Ireland, some form(s) of partnership between the marine renewables industry and relevant interest groups is vital. As the Consultation Draft points out²⁹ *'...a key objective will be to ensure an inclusive process of engagement and consensus building across society and with local communities, learning from the experiences of the consenting processes for existing ORE developments.'*

At a national level, this should take the form of liaison and dialogue between relevant interests. Accordingly, MRIA welcomes the reported initiative by the Department of Housing, Planning and Local Government to lead a dialogue between offshore renewables and the fishing industry which hopefully will lead to a common protocol between the two parties. MRIA looks forward to contributing to this work. More challenging is local engagement: how can a Social Licence to Operate be achieved for a specific region or bay or project? At which level should it be pitched or focused - region or bay or both, for example?

It is intended³⁰ to develop, but apparently only in the *next cycle of marine spatial planning*, at least three REGIONAL MARINE PLANS in a co-ordinated effort between DHPLG and groups of local authorities which, on the face of it, seems too limited a range of involved stakeholders. We note too that DHPLG intend to experiment with partnerships at a LOCAL LEVEL, perhaps based on one county or part of it (e.g. a bay). In the first instance, this experiment seems likely to be tried out in Wexford and reportedly will particularly involve the local authorities and be confined to the Nearshore³¹.

²⁷ See section 10 of *MRIA Discussion Paper* where a comprehensive review of international practice and MRIA's recommendations in this vital area are set out.

²⁸ SLO has been variously defined as 'free prior and informed consent of local communities and stakeholders' (World Bank, 2003), 'the acquisition and ongoing maintenance of the consent of local stakeholders' (Pike, 2012) and 'a set of concepts, values or practices that represent a way of viewing reality for industry and stakeholdersto create a forum for negotiating whereby the parties involved are heard, understood and respected' (Nelsen, 2009).

²⁹ *Consultation Draft*, P123

³⁰ *Consultation Draft*, P24

³¹ 'Nearshore' is a new concept which is subject to final negotiation between the Department of Housing, Planning and Local Government and the maritime coastal authorities on boundaries - the boundaries will be negotiated with each affected local authority.

MRIA welcome the strategy outlined - to develop a common protocol between marine renewables and fishers and to devise regional plans (in the next cycle), although an earlier start on the latter might be useful. However, the Association is concerned about the limited local pilot initiative.

MRIA recommends that the pilot project in local partnership should be extended to one or two other counties contemporaneously (Donegal, for example, may be willing to become involved) so that other approaches can be tested. We are uneasy with the focus at this stage on a model which is so confined in sea space coverage as seems likely in the muted Wexford exercise. Other models, which extend further out to sea where offshore renewables development is likely, should be tried too. The NMPF will link in de facto to both the *Regional Assemblies' Spatial and Economic Strategies* and, also, to *County Development Plans*, which are further drivers behind the need to get the partnership model 'right'.

Overall, a bigger and earlier ambition in partnership is required to make a success of the NMPF.

7. Other concerns with current *Consultation Draft*

MRIA has concerns about a number of other issues dealt with in the Consultation Draft: the availability of an adequate number of policy-makers etc to develop and implement the NMPF and, indeed, related policies; education and training for the offshore; the need for tight marine-terrestrial planning links; the treatment of grid development for offshore renewables; and the implementation of the NMPF.

➤ 7.1 PUBLIC SERVICE RESOURCES

Ireland has embarked on a total 'remake' of its marine governance regime. There are many factors at play but undoubtedly the *Climate Action Plan*³² target for offshore renewable energy is a principal one. The new maritime 'tapestry', extending from policy formulation to consenting to the arrangement of *Renewable Energy Support Scheme* auctions, is wide-ranging and complex. It is also skilled-public-service-people intensive and its success will pivot on the availability of top class policy makers and experts in the public service in bodies stretching from the Departments of Housing, Planning and Local Government and Communications, Climate Action and Environment to An Bord Pleanála to the Sustainable Energy Authority of Ireland to local authorities to the Marine Institutethe list goes on. Ensuring that the correct resourcing is in place will allow for timely decisions to be made and may reduce the likelihood of successful judicial review proceedings against planning decisions.

The maritime 'remake' to date has been carried on the shoulders of a handful of outstanding public servants. But this is not sustainable and the new NMPF 'tapestry' will prove thin, fragile and unworkable unless action is taken. The incoming Government must address the peril of trying to develop our immense offshore renewable energy resource

³² *Climate Action Plan*, op cit

without staffing properly the policy formulation and execution machinery of Government in this area. Exploiting the resource holds the promise over the next two decades of substantial new jobs and income creation as well as national energy security in an increasingly divided world. It will be impossible to direct and fulfil this most complex work, which will run for generations to come, with only a handful of assigned public servants scattered among the various State bodies

The solution lies in one of two directions. The first would be to create an all-encompassing offshore development body - an 'IDA or Enterprise Ireland of the ocean' - and staff it accordingly. However desirable this might be, a new all-embracing development agency would take years to establish and the effort to set it up could in itself distract from, and hinder, the early development of our offshore resource.

MRIA suggests that an alternative, and more realistic avenue, would be a special, ring-fenced allocation of extra staff to deal with offshore renewables. This would be an all-of-Government, once-off exercise to identify and to fulfil the relevant staffing needs of all of the State institutions with a part to play in the offshore renewables field. This staffing project might have to be led by the Department of the Taoiseach³³ who have played an important coordinating role in recent years in the remake of maritime policy.

Moreover, a successful public sector oriented marine education and training programme needs to be devised and led by appropriate institutions (notably the *National Maritime College of Ireland* and the *MaREI* programme led by *University College Cork*). Officials at all levels need the opportunity to acquire the knowledge and skills required to lead and drive the great national challenge ahead, one which should have an important part to play in the history of Ireland in the 21st century...see also 7.2 which focuses on private sector needs.

➤ 7.2 EDUCATION AND TRAINING

Offshore renewable energy development will, over time, require a large number of people in the private sector who are educated and trained in marine skills and sciences, ranging from basic seamanship to marine planners to high level specialist scientists in areas such as mathematical modelling. Given our historic 'sea blindness', it is unsurprising that such people are generally in limited supply. The training and educational institutions are generally in place (e.g. there has been significant investment at the *LiR National Ocean Test Facility* at University College Cork and at the *National Maritime College of Ireland*, part of Cork Institute of Technology), although there is a need to involve more directly the important marine cluster in Donegal via *Letterkenny Institute of Technology*.

However, the maritime educational and training sector lacks a voice at the national policy level. It is, for example, surprising that the Department of Education and Skills apparently are not involved in the *Interdepartmental Marine Coordination Group*. This is important for the NMPF whose success will in part depend on the availability in Ireland of suitable skilled people. The alternative would be to sub-contract out our marine development to other

³³ The Secretary General of this Department is also Head of the Civil Service. The Department chairs the *Marine Legislation Steering Group*.

countries with only low value-added activity located here. This would undoubtedly undermine public support over time for the sector.

It is recommended that the NMPF gives recognition to the skills and education issues outlined above and that early consideration be given by the *Interdepartmental Marine Coordination Group* to ways and means of engaging the *Department of Education and Skills* and, particularly, the *National Maritime College of Ireland* in the NMPF policy process and in the general task of developing policy to exploit our remarkable offshore energy resource.

➤ 7.3 MARINE-TERRESTRIAL PLANNING LINKS

The stated intention of Government (e.g. in the MPDM General Scheme) is that offshore renewable energy projects will seek consenting, ‘planning permission’, from An Bord Pleanála and will be treated by ABP under the ‘Strategic Infrastructure Development’ regime. Renewable energy projects will usually³⁴ make landfall and will need to connect up with electricity infrastructure located ashore. This means that their cabling will move through the Nearshore and then over the shore area and on inland where local authorities again reign.

It is, however, intended that An Bord Pleanála will deal exclusively with renewable energy in all three domains - offshore, Nearshore and over-shore/inland.

Notwithstanding the importance expressed throughout the Draft Consultation about the need for a strong link between terrestrial and marine planning systems, there is considerable scope for confusion and legal challenges unless there is inter alia tight co-ordination between those charged with the NMPF and those responsible for drafting and later operating the new consenting legislation, the MPDM, as well as with the local authorities and An Bord Pleanála. It would be beneficial too if the Regional Assemblies’ *Regional Economic and Spatial Strategies*³⁵ and, also, the relevant *County Development Plans* were to give explicit recognition at the earliest opportunity to the strategic, national importance of developing our offshore renewables resources.

➤ 7.4 ENERGY - TRANSMISSION

The Consultation Draft is ‘grid light’ with the section on ‘Energy-Transmission’³⁶ largely confined to the undeniably important topic of interconnectors which permit the export and import of electricity to and from other jurisdictions. However, the development of offshore renewables to meet the *Climate Action Plan* targets is inextricably linked to the availability of grid and the provision of extra grid capacity³⁷. The final NMPF should recognise this issue

³⁴ Over time, projects may emerge which do not wish to make landfall in Ireland e.g. projects which employ offshore wind or wave farms to convert seawater to hydrogen and then ship it directly away to use elsewhere as a power source.

³⁵ An example of such a Strategy is contained at www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy

³⁶ *Consultation Draft*, section 9.0

³⁷ The *Climate Action Plan* puts explicit emphasis on Grid at p58

explicitly and provide an up to date state of play regarding EirGrid's development plans for offshore renewables.

Moreover, the *Irish-Scottish Links on Energy Study (ISLES)* study³⁸, funded by the EU's INTERREG IVA Programme, has found that development of an interconnected transmission network would help drive further growth in the renewables sector, create jobs, generate revenues and ensure future sustainable energy supplies by better connecting and exporting electricity. Recognition too should be given to the EU's *North Seas Energy Cooperation*³⁹(NSEC), of which Ireland is a member. The NSEC '...supports and facilitates the development of the offshore grid development and the large renewable energy potential in the region'.

Overall, the Consultation Draft needs, in its final manifestation, to expand on 'grid' and to highlight the key role it will play in offshore renewable energy development with significant implications for marine spatial planning.

➤ 7.5 IMPLEMENTATION ARRANGEMENTS

The Implementation Arrangements⁴⁰ for the NMPF are vital. These, probably, will be spelt out in secondary legislation which will follow the adoption by Government of the final NMPF. We note the proposal to repurpose the extant high-level Interdepartmental Group and the Stakeholder Advisory Group as '.... implementation bodies to ensure that the NMPF and its main proposals are given top-level commitment, including of a budgetary and investment nature...'⁴¹.

The NMPF will stand or fall on the depth and strength of the implementation arrangements. They must take account both of the complex governance regime emerging for Irish waters - including Strategic Marine Activity Zones, new roles for An Bord Pleanála and local authorities, the muted Offshore Renewable Energy Development Body, local partnerships etc - and allow for a transparent, efficient and effective course for offshore renewable energy developers to steer. One of the next tasks of DHPLG in regard to the NMPF, therefore, should be to set out the planned arrangements in detail and to consult on them. This should not await the finalisation of NMPF and the introduction of secondary legislation.

³⁸ www.merriestreet.ie/en/Category-Index/Economy/Energy/irish-scottish-offshore-renewable-energy-grid-2.html

³⁹ www.ec.europa.eu/energy/topics/infrastructure/high-level-groups/north-seas-energy-cooperation_en?redir=1

⁴⁰ *Consultation Draft*, section 21.0

⁴¹ *ibid*