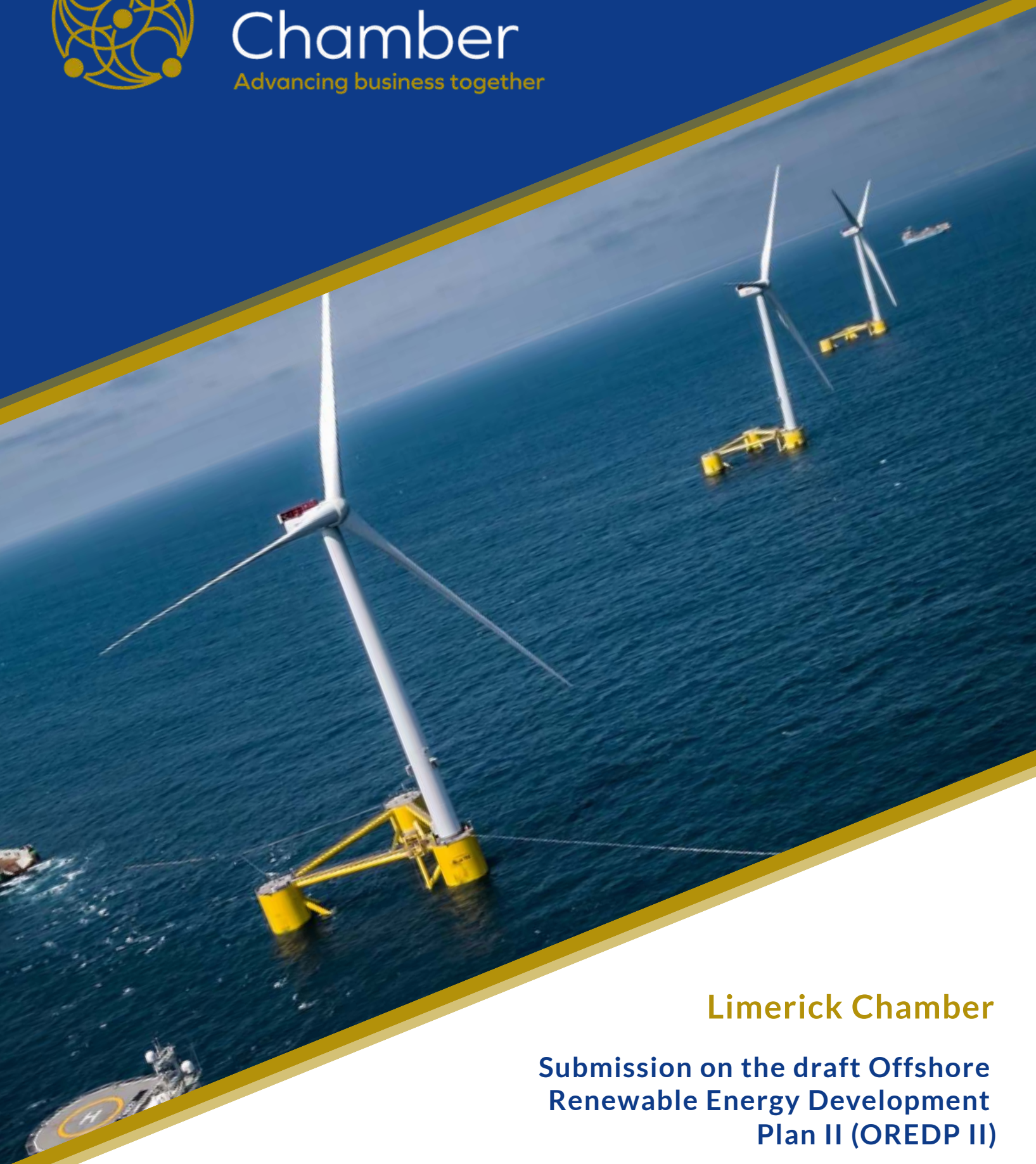




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Limerick Chamber

**Submission on the draft Offshore
Renewable Energy Development
Plan II (ORED P II)**

April 2023

Introduction

Limerick Chamber would like to thank the Department of Environment, Climate and Communications for the opportunity to submit our members' views on the Offshore Renewable Energy Plan II (OREDPII). The plan represents a significant opportunity to produce a national spatial strategy for offshore renewable energy and will become one of the building blocks for the long-term operation of the sector. That makes OREDPII absolutely critical in Ireland's journey towards a sustainable future and also our ability to attract and retain operators and their investment.

Offshore Renewable Energy (ORE) and in particular Floating Offshore Wind (FLOW) represents a monumental opportunity for Ireland in terms of advancing towards our climate goals but also in lifting the economic and enterprise prosperity of the country. Not only does Ireland have the potential to be a massive generator of renewable energy through this industry but it will also give Ireland energy security while decreasing reliance on energy from foreign nations.

Therefore, given the impact that OREDPII has on the sector and the future of Ireland, there are some critical aspects that need to be examined as part of the post-consultation process.

Areas of Concern / Feedback

Broad Areas of Interest (BAI) - Size

While the plan-led approach under OREDPII offered the opportunity to present a clear plan to the sector, instead it has cast doubt amongst operators. Firstly, there is the case of the Shannon Estuary (West BAI), one of Ireland's greatest potential resources for ORE. The BAI on the west coast of the Shannon Estuary is too small, too shallow, and too close to the shoreline. FLOW is more suited to depths of between 85 to 300 metres and upwards. By keeping the proposed area in the existing plan, this would limit operators to depths of 100 metres and below, which would undermine potential and existing investment.

The 100 metre limit signals a lack of ambition and puts ceilings on the potential of the industry as well as forcing FLOW operators to areas which may be unsuitable or non-optimal. In essence it will produce mediocre results compared to the true potential of the industry.

As per the draft OREDPII document "*key assumptions used in the analysis were based on expert input and current research, with fixed turbines assumed to be suitable to deployment to 60m depth and floating wind suitable from 60 metres depth out to a limit of 1000m depth.*" While we appreciate that the analysis for FLOW is from 60 to 100 metres, this appears to be based off current operational projects abroad. These projects abroad are mainly used for demonstration or proof of concept rather than a commercial operation. In fact the Hywind Tampen project, currently under construction, will operate at depths between 260 and 300 metres. This project delivered its first power to the grid in November 2022. Ireland must not be limited in this regard when other countries are more ambitious in their depths.

The technology that will be deployed in Ireland is larger technology and will require greater water depths for anchoring safely to the seabed – therefore 60 to 100 metres is not in keeping with the practical aspects of a commercial scheme.

Furthermore, the draft plan provides an opaque view as to what it is suggesting with "*Bathymetry potential for floating wind*" being outlined as 60m to 100 metres water depth but up to 1,000 metres cited elsewhere in the document as being feasible for FLOW.

As FLOW technology improves, water depths of 80 to 300 metres and above will be more suitable and in some international cases projects of this depth are already under construction. Restricting operators to smaller depths will serve to impede, rather than enable, investment. We would ask that 60 to 100 metres is reviewed for the final draft.

Broad Areas of Interest (BAI) – Location:

The proposed BAI for the west is located close to shore. This could result in unnecessary visual impacts from the shore but it will also have a greater impact on inshore fishing activities and other environmental and ecological interests. Unlike offshore fisheries, locating a BAI this close to an inshore fishery area could result in the unnecessary displacement of local fisheries and unlike offshore fishing, inland fishing cannot easily relocate. These issues, outlined above, could leave potential projects more open to a planning challenge which increases investor risk.

Existing Developments:

In line with government policy to date, industry has spent significant time and money over the last years to develop certain project areas that have been excluded from the draft BAIs. These project areas were proposed following detailed assessment of suitable conditions for suitable sites. Operators have invested in data collection and building rapport among local stakeholders and communities. The existing development work undertaken could provide an adequate baseline of information to inform the DMAPS portion of this policy work. Leveraging this existing work is key in establishing the industry efficiently.

Wind Resource Potential:

It would be appropriate to remove the wind resource potential for FLOW as a criterion and leaving this to the project developers to design the optimal technology for conditions in that particular site or environment, as offshore wind speeds are broadly uniform (at 9.8-10.8m/s) on the west and south coast of Ireland.

Policy Context:

The OREDPII plays a significant role within the existing policy landscape. The plan needs to demonstrate its harmony with the National Ports Policy, the National Planning Framework and regional and local development objectives such as those contained within county local development plans and the Regional Spatial Economic and Strategy (RSES). These policy documents clearly outlined the hierarchical function of ports throughout Ireland and also other strategic development opportunities for the offshore industry, such as the potential for the Shannon Estuary.

Onshore Support Infrastructure:

The final OREDPII plan must take into account the capacity and existing infrastructure of ports to facilitate the 2030 ORE targets. Furthermore, funding must be increased in this regard given the identification of deficiencies and the need for investment in port infrastructure to facilitate meeting the 2030 targets - as outlined in the *National Ports Study* commissioned on behalf of Wind Energy Ireland.

Port capacity and infrastructure are critical requirements and enablers in facilitating the development of ORE. They play a significant part in the consideration for optimal locations ORE development.

However, the information used to inform the BAIs does appear to take into account the location, accessibility or the capacity of port facilities in facilitating the ORE industry.

Deciding on BAIs must take into account Port infrastructure provision and existing and planned capacity.

Certainty for the Sector:

The move to a plan-led system under the draft OREDPII means that organisations will no longer be able to advance preferred sites, sites where significant resources have already been deployed as outlined above, if they fall outside BAIs.

While Limerick Chamber acknowledges the benefits of a plan-led approach, this quick change in policy as well as the absence of any further delivery timeline and the lengthy lead in time for the preparation of the Designated Maritime Area Plans (DMAPS) has created uncertainty around continuing to develop and invest in Ireland. This uncertainty is exacerbated further with the delay in establishing the Marine Area Regulatory Authority (MARA) which was due to be established in Q1 2023.

The state must work with the development industry and port operators to overcome and quell this uncertainty, perhaps through the establishment of a working group.

Localised Datasets:

It is not immediately clear as to what methodology was used regarding localised datasets and how the availability of localised datasets were applied to the proposed BAIs. This is a critical step to inform people and garner feedback. Furthermore, the actual data and its metrics do not appear to have been outlined in a clear and concise manner except for an attached excel sheet.

The availability of localised datasets is likely unsuitable criterion in the context of the three proposed BAIs as there is no evidence of better dataset availability in any specific areas. Furthermore, there is no roadmap on how such localised data is due to be captured and disseminated. While Limerick Chamber is in favour of an evidence based approach, the process must be transparent and enable development.

The importance of Shannon Foynes Port Company (SFPC):

SFPC is home to Ireland's deepest sheltered commercial harbour and largest bulk port. It provides access to the substantial renewable resources of the Atlantic and is designated a Tier 1 port of national significance under the *National Ports Policy*.

The *National Ports Policy* recognises the approach taken by SFPC in identifying the Shannon Estuary as a 'specialist energy hub' with particular emphasis on the ocean energy sector and ORE development. The Strategic Integrated Framework Plan for the Shannon Estuary' (SIFP) identified several strategic development locations and deep water sites situated along the Shannon Estuary suitable for deep water marine and ORE development activities.

Vision 2041, SFPC's 30-year spatial and economic masterplan, emphasised the role and opportunity of SFPC in developing and facilitating ORE development. The strategic review of *Vision 2041* builds on this ORE model further and as a result of technological advancements estimates that over 70GW of ORE is within reach of the Shannon Estuary.

The opportunities presented by the SFPC ocean energy hub are based on its proximity to the ORE locations and existing port capacity and port planning to accommodate the essential marine and terrestrial infrastructure. Consideration of the availability of the existing infrastructure and port capacity is critical if Ireland is to realise its renewable energy targets.

It has been suggested that the reason the West BAI is one third of the size of the Donegal and Cork sites may have been due to the site being further away from a port. If correct, Limerick Chamber does not agree with this decision, as the West BAI is strategically located in proximity to SFPC. Furthermore, SFPC has produced a plethora of research that provides an evidence base that it is, or can be, a key enabler to ORE development off the west coast.

Conclusion

Ireland's maritime area is seven times its landmass, however, the current BAIs, as outlined in the draft report, represent just 4.5% of Ireland's exclusive economic zone (EEZ). There is the opportunity to push for greater ambition as part of the finalisation of the OREDPII process. While FLOW provides a significant opportunity for Ireland, there is scope to make the approach to BAIs more holistic and take into account a greater scope of technology outside of FLOW generation. The ambition of the BAIs should match the ambition of the sector and it should be a sounding call to the world of Ireland's ambition to support investors and relay confidence.

It is essential that critical aspects of OREDPII are re-examined to ensure the success of the industry lest this opportunity be squandered.

In essence, OREDPII must reflect the current and emerging technologies and current and future ports capacity and infrastructure which provide an evidence base that the potential for ORE is far greater than what is suggested within the draft OREDPII document. Again, we thank the Department of Energy, Climate and Communications for the opportunity to submit our members views on OREDPII, we strongly encourage that the Department continue to liaise with, and listen to, industry on this incredibly important matter.



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