



Cork Chamber
Fitzgerald House
Summerhill North
Cork
T23 TD90

MSP Submissions
Marine Spatial Planning Section
Department of Housing, Planning, Community and Local Government
Newtown Road
Wexford
Y35 AP90

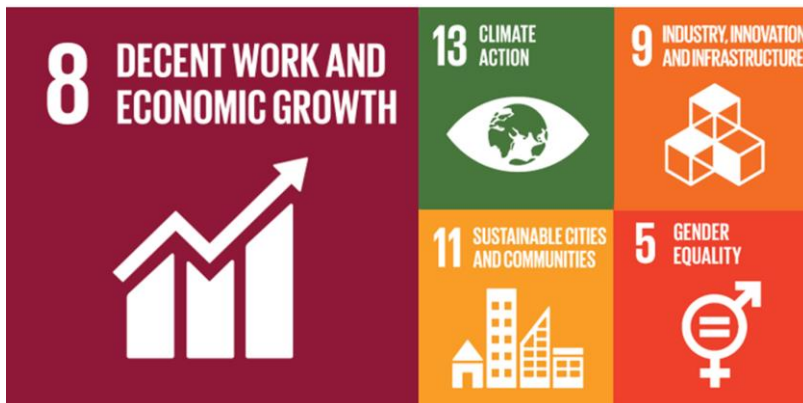
28 April 2020

Re: Submission to National Marine Planning Framework Consultation Draft

To Whom It Concerns,

Cork Chamber is the leading business organisation in Cork, proactively working to identify and progress developments that are facilitative of economic and sustainable growth. Representing an employer base of close to 1,200 businesses and over 100,000 employees across the region, Cork Chamber is the largest business representation organisation in the south of Ireland.

This submission has been guided by our commitment to the UN Sustainable Development Goals. Five specific goals have been identified by the Irish Chamber Network which we are actively advocating for throughout our work;



We welcome the opportunity to engage in this public consultation process and are strongly supportive of the development of a National Marine Planning Framework which protects, enhances, and manages the opportunities associated with Ireland's most valuable natural asset. We believe the appropriate management of our marine environment will be key in sustainably harnessing its inherent opportunities. Our ocean wealth is dependent on our ocean health and vice versa, and it is crucial that this resource is managed to ensure its long-term resilience, and the resilience of our coastal habitats, topographies, marine life, and coastal communities and livelihoods. Ireland's coastal and marine territory holds vast latent potential, as such the NMPF is a crucial pillar to Ireland's long-term progress.

It is also worth noting that there should be scope for reviewing the effectiveness of the plan to stimulate sustainable economic activity on an ongoing basis, and that clarifications and guidance required to provide investor certainty should be forthcoming and open as required.

Offshore wind energy potential

The development of large-scale renewable energy generation is critical to Ireland's competitiveness, climate credentials and international reputation as a progressive state. In the context of the deepening climate crisis, and the phased decommissioning of an ageing stock of coal and peat fired energy facilities, the time has come to invest in progressive, sustainable technologies that can dramatically decarbonise our grid.

We've had success with onshore wind power pioneered by local councils through the mapping of the wind profiles and facilitation of multiple developments, commencing over a decade ago. Nationally, wind energy became Ireland's number one source of electricity for a full quarter for the first time during the first three months of 2020. In Q1 2020, SEAI figures show that 43.8% of Ireland's electricity was generated through wind energy. Efforts to date have clearly been progressive and fruitful, yet they must only be regarded as first steps.

The next steps must be bold and impactful. We must promote and facilitate the development of offshore wind. As an island nation, we have a unique opportunity to build on our rich maritime heritage and enhance our blue economy.

Offshore wind turbines generate incredible outputs, with a single 8MW turbine creating power for 7,500 homes and up to 13,500 on a good day. Turbines of this scale are located just 8km off the shore of Liverpool and manufacturers such as Siemens, GE and Vestas continue to push the envelope with outputs of up to 12MW. Power from installed offshore turbines run through underwater cables along the seabed to an offshore substation which cleans and filters the electricity before an underwater cable carries the energy to shore. Underground cabling continues from here, connecting to a final substation that plugs the power to the grid at the most appropriate point. The technology is clean, inspiring and discreet.

Looking to the progress of our nearest neighbours shows that the offshore sector can deliver exceptionally well in a favourable regulatory environment. Over the past decade the UK has

attracted almost 50% of European offshore wind investment — worth €40 billion. The UK activity of the leading offshore wind developer, Orsted, provides the perfect example.

Multiple projects such as Burbo Bank Extension 258MW, Race Bank 573MW, and Walney Extension 659MW, have been delivered over the last decade, providing power for almost 3.3m homes. Three further projects, Hornsea 1, 2 and 3 will provide up to 5,004MW and power 4.6m homes. To highlight the scale, these Hornsea projects have an equivalent output to that used by the Irish grid daily.

In Europe, almost 19,000MW of offshore wind generation is installed. In 2018 over 2,500MW was installed and over 4,200 MW of projects reached final investment decisions, representing €10.3 billion in asset investment. It is clear then that Ireland has the potential to enter a robust and mature market, both from a technology and financing perspective.

We are not without offshore progress. The Arklow Bank continues to generate 25MW of power on an ongoing basis and a second phase has potential for a further 520 MW. A floating turbine may be deployed at an SEAI site near Belmullet in Mayo by 2022, and DP Energy Ireland have a proposal for a 720MW wind farm off the coast of Ballycotton in Cork. By developing assets such as the Eirgrid Celtic Inter-connector that will connect Ireland with France via a 700MW subsea cable, we may even have the opportunity to trade energy with Europe as the EU continues to back the sustainability agenda more forcefully.

To facilitate this sector it is also important for the plan to facilitate the placement of transmission infrastructure linking offshore energy generators to landfall points. This must be clearly provided for to give confidence to developers.

Subsidy Regime

While Ireland has been slow off the mark, the market for offshore is now mature and proven and this represents opportunity for us. The technology has advanced at an exceptional pace and the level of investment required has fallen dramatically. The state investment cost of offshore wind in Europe has fallen from €4.41m/MW in 2013 to €2.45m/MW in 2018. In the Netherlands and Germany, specific zero-euro bids have even been successful.

The establishment of a planning and consent regime that is sensible and attractive to developers, coupled with an active subsidy regime will deliver renewable energy of scale for Ireland. We welcome the revised general scheme of the Marine Planning and Development Management Bill approved in 2019 and have viewed this as a crucial step forward.

In short, the value of offshore wind to the state has never been higher in monetary terms or more critical in environmental terms. The technology is proven, and the sector is mature. There are multiple record-breaking large-scale wind farms in the Irish Sea, yet they do not power Ireland. Irish planning and licensing must be defined, and the subsidy regime must be robustly supported throughout the lifetime of the plan.

Tourism



Cork boasts an internationally renowned cultural and tourism offering and is the unique meeting place of both the Wild Atlantic Way and Ireland's Ancient East. Consistently in Ireland's top 3 tourism destinations, Cork is a central focal point of the tourism product nationally.

Cork boasts Ireland's second longest coastline, with rich natural, historical and cultural characteristics. It is prudent that as a nation we preserve and protect these natural assets with investment to ensure their longevity, and where suitable their appropriate development to ensure the survival of strong local communities, the natural assets themselves, coastal environments and strong ecosystems. Tourism as Ireland's largest indigenous sector is a key component of strong rural economies. While now critically affected by the Covid-19 pandemic, nationally we must ensure a framework that supports the development of this tourism product in the years ahead and support these communities in rebuilding sustainably their local tourism activity.

The tourism sector is of critical importance to the economy of Cork and Ireland. It is essential that the plan complements and enhances the development of our tourism infrastructure, greenways, blue ways and other features which can help us to make the most of our unrivalled natural resources.

Foreshore licences

We welcome the adoption of a single consent system for developments to replace the current cumbersome system of leases, licences and planning approvals, which in the past has led to confusion and duplication.

Finally, we emphasise the value of public consultations and welcome future opportunities to engage on this and associated topics. We highlight the opportunity to engage with private sector business representation and believe there are practical benefits in this approach. We believe that this is instrumental to facilitate fully representative discussions of future pathways and actions that are informed via ground up engagement.

Yours Sincerely,

Cork Chamber