

Offshore Environment and Consenting Division  
Department of the Environment, Climate and Communications  
29 – 31 Adelaide Road,  
Dublin 2, D02 X285

20<sup>th</sup> April 2023

**RE: OREDPII Public Consultation**

To whom it concerns,

Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals five of which have been identified by the Chambers Ireland network.

We welcome the opportunity to contribute to this highly important consultation. We commend the Department of Environment, Climate and Communications for taking on this incredibly important policy document that once concluded should provide the needed stability and certainty to fuel investor confidence, meet our climate targets and ensure the stability and affordability of energy supply for years to come.

As the voice of business in Cork and having consulted with our members, we wish to put forth a series of comments, suggestions and advice as this hugely important task of developing Ireland's Offshore Renewable Energy Development Plan II is consulted on.

Yours sincerely,



Conor Healy  
CEO

## Communication & Industry Engagement

The Irish Government must more meaningfully engage with the renewable energy sector to take full advantage of the technical expertise available and understand what is required to deliver and meet our climate and renewable energy targets. Certainty means no surprises, and certainty is absolutely required to deliver on offshore wind.

Over the years the state's failure to provide this needed certainty has impeded the credibility of the Irish regulatory and planning system and investor confidence. We cannot make light of the withdrawals of global energy supermajors, Equinor and Shell from offshore wind energy (ORE) developments that would have contributed 2.8GW of clean energy, capital investment and jobs to the economy. These exits reflect the uncertainty and risk in Ireland's regulatory and planning regime which still pose mounting risks for the future of our ORE industry.

Taking an average of 60 weeks for a decision from An Bord Pleanála, lengthy delays in the planning system are one of the biggest blocks to progress with ORE development. Government has constantly missed their own deadlines for new regulations, auctions, and permitting. Even with new timelines, the industry believes this is set to continue, further undermining confidence and delivery. If the 2030 target of delivering 5GW is to be met, the majority of Phase 1 projects will need to be approved and delivered, the timelines for both Phase 2 D-MAPS and for opening a specific route to market for floating offshore wind projects by Q1 2024 has to be delivered upon.

The final version of the OREDPII must provide certainty for developers in order for real progress to be made. Clear and meaningful communication, engagement and collaboration with industry and consistent policy direction are all essential to provide the certainty and investor confidence needed to deliver on our renewable energy targets.

The structure of the UK's Offshore Wind Industry Council<sup>1</sup> is a best practice example of leadership and meaningful engagement between Government and industry, and we suggest a similar forum or structure be established for ORE development in Ireland. Government must communicate and co-create policy with industry, so that industry can plan and know the parameters in which it can operate while informing policymakers. Working collaboratively is the only way we will reach our targets.

The recent changes to ORE policy, specifically the Phase 2 Policy Statement published on March 10<sup>th</sup> did not reflect the consultation carried out last year by government with industry on how to move forward. This sudden U-turn in policy has further undermined the certainty and confidence that the industry and developers need in order to deliver on projects, and international investors expect when investing billions into the Irish economy.

There is no doubt we are falling behind Europe in our progress towards climate action. While we possess an abundance of wind energy potential, without stability and consistency

---

<sup>1</sup> <https://www.owic.org.uk/>

in policy and certainty in our planning and regulatory system, potential alone will not provide the certainty investors need.

It is clear from this draft OREDPII consultation that there is a pressing need for industry technical expertise and understanding of the industry's challenges to inform policy that will enable the industry to progress at the pace which is needed.

## Broad Areas of Interest (BAIs)

Three Broad Areas of Interest (BAIs) have been identified in the OREDPII as suitable locations for ORE development in order to enable Ireland to meet our 2050 climate action targets. The following criteria were used to choose these BAIs:

- Availability of localised datasets
- Bathymetry/water depth
- Proximity to electricity demand centres
- Industrial opportunities
- Proximity to existing/planned interconnectors
- Supporting onshore infrastructure
- Wind resource potential for floating offshore wind

We have a number of comments and concerns regarding the BAIs, the suitability of these criterion and offer additional criterion that should be considered in identifying BAIs.

## Key Criteria

The **cost of development** should be a key criterion in determining sites for development. Lower cost sites should be targeted first and the overall costs used as a key metric as these feed into the price and affordability for end-energy users.

The ability for **co-location of different energy sources** e.g., wind, wave, tidal and solar, while also combining generation, transmission and storage should be a key consideration. The future of Ireland's renewable energy system is hybrid and co-location can significantly expedite and reduce the costs of developing our renewable generation capacity. Concentrating these sources into "**energy zones**" will also reduce the amount of connectors and infrastructure needed to bring power ashore, reducing potential impacts on our maritime environment and conflict with industries who share this maritime space. However, Irish energy storage policy needs to be updated, as an imperative for cost effectiveness and energy security.

The OREDPII must clearly connect our decarbonisation of industry policy and the location of ORE generation. **Proximity to ports, locations for hydrogen generation, and industry demand centres** are central to the decarbonisation of industry and to meeting our climate targets and should be key criterion for BAIs. Locating wind farms far from major ports like the Port of Cork which already has an industry supply chain and energy cluster would be a missed opportunity, resulting in increased costs and greater risks as the power would have

to be transmitted further, thus undermining our ability to provide a clean and affordable energy source. Cork has a key role to play in Ireland's offshore wind and hydrogen story and in its ability to meet its 2030 targets.

**Realistic timelines to delivery** need to be considered when selecting these ORE development areas so that they can deliver the GWs needed within the timeframes to 2035, 2040, 2050 and beyond. A joined-up approach is needed, and the OREDPII should be aligned with Project Ireland 2040 and the Marine Planning Framework to target investments within the needed timeframes so that we can meet our targets.

**Datasets** that have already been collated by developers should be used as localised datasets. In the context of the three proposed BAIs there is no evidence of dataset availability in the respective regions or understanding of how these datasets were used in the selection of the BAIs. Further, a **centralised database** of datasets from developers should be created.

## Key Industry Concerns

### **Integrating plan-led and developer-led**

While we agree in principle with a plan-led approach to ORE development in general, as it will provide market certainty, certainty for other stakeholders in the marine sector and forward planning for the medium to long term and enduring regime, we have key concerns.

Prior to this policy change, developers had already committed significant investments to progress various ORE projects that are situated outside of the BAIs. Rather than losing out on already committed investments and ready sites, both the developer-led and plan-led approach should be integrated to ensure delivery of GWs, given the pressing climate targets that we are currently failing to meet.

We recommend that the BAIs include these well-developed project sites, which could then inform assessments for the plan-led approach and D-MAPS.

### **Joined-up strategy**

A single coherent and interlinked low carbon industrialisation policy and strategy bringing together renewables, hydrogen, industry decarbonisation, port strategy and grid infrastructure is required for real progress, including the role of energy storage.

### **BAIs too restrictive**

There are a number of industry concerns regarding the chosen BAIs. The three areas identified in the maps are too restrictive and our members are reporting that there are other broad areas with strong viability outside of the BAIs in the draft document that would be more suitable for development.

For example, the water depth criterion restricts depth to 60-100m which in turn will restrict innovation and technology development. As floating offshore wind technology progresses depths of 80-200m will become more suitable.

Developers should be encouraged to bring forward detailed mapping and assessment of BAIs for consideration, to ensure meaningful stakeholder engagement which technical analyses alone cannot replace. Technology in the industry is developing at pace. Issues such as water depths and viability of technologies should be assessed with industry input. As such, the BAIs and criteria must allow for flexibility as technologies continue to progress.

### **Grid dominating development**

The grid and system operator has been allowed to dictate the pattern of offshore wind development, even though it's inability to deliver infrastructure is what is holding the industry back. Grid infrastructure needs to be developed to meet the needs of renewables deployment, not the other way around. Scotland for example takes an innovation-led approach, allowing for alternative routes to market, which has in part led to the Scottish industry's great success in ORE. The Irish grid is already constrained and does not have sufficient capacity to meet our 2030 targets. Significant investment in the grid is required if we are to meet our targets.

## Conclusions

The development of the Irish ORE industry at scale will present significant economic, environmental and social benefits. There are a number of roadblocks that still stand in the way, but with significant and meaningful engagement with industry we believe the path towards energy resilience, security, sustainability and affordability can be cleared.

With a view to meeting our climate targets in an energy security crisis we urge you to give the issues raised due consideration and we remain at your disposal to share any additional insights from our member businesses.