



Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Draft Offshore Renewable Energy Development Plan II (A National Spatial Strategy for the transition to the Enduring Regime)

The Eastern and Midland Regional Assembly (EMRA) welcomes the publication of the Draft Offshore Renewable Energy Development Plan II (OREDP II) which sets out a national spatial strategy for moving towards a plan led approach to developing offshore renewable energy (including for opportunities for wind, wave and tidal energy) within Ireland's Maritime area as part of the enduring or long-term regime. The submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of April 2023.

Background and Relevance of the OREDP II at a Regional Level

The National Planning Framework (NPF) is a parallel document to the National Marine Planning Framework (NMPF). Whilst the NPF is a national document to guide at a high-level, strategic terrestrial planning and development, the NMPF provides the same guidance for marine development. The NPF, with the National Development Plan as part of Project Ireland 2040, set out the context for the Regional Assembly to develop the Regional Spatial and Economic Strategy (RSES). The RSES for the Eastern and Midland Region was made in June 2019 and sets the context for each local authority within the Eastern and Midland Region, to develop their county and city development plans in a manner that will ensure national, regional and local plans align. The RSES identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region.

Central to the successful implementation of the RSES is the realisation of Regional Strategic Outcomes (RSOs), contained as part of the Strategy and defined as a mechanism to achieve the National Strategic Outcomes (NSOs) of the NPF.

In June 2021, the Government published the finalised National Marine Planning Framework (NMPF) as Ireland's first marine spatial plan and sets out an overall decision-making framework for our shared space. The NMPF highlights a number of policies relevant to the provision of new offshore renewable energy and makes reference to the important role the OREDP II will play in supporting the move to a plan-led regime for such renewable energy infrastructure.

Of particular relevance to the development of common objectives within the NMPF and OREDP II for a transition to renewable energy sources are the RSOs that support a strengthening blue-green economy, that build climate resilience, that protect and enhance international connectivity and regional accessibility, support strengthened urban and rural communities and economies, along with the sustainable management of water and other environmental resources.

The Regional Spatial and Economic Strategy 2019-2031 supports the recognition that managing our ocean wealth requires an overarching national marine spatial plan underpinned by an efficient and robust planning and licensing framework. This type of approach will provide a governance structure and blueprint for national, regional and local planning of our ocean wealth and assist in realising the benefits of ocean wealth while managing our resources effectively and sustainably.

As stated in the Draft OREDP II, the purpose of the plan is to provide an evidence base to facilitate the future identification of areas most suited for the development of fixed wind, floating wind, wave and tidal as part of the enduring (long term) plan-led regime. It is a high-level guiding framework and national spatial strategy that will be used by the Department to identify Broad Areas of Interest for offshore renewable energy. It does not identify specific areas for offshore renewable energy development but provides a framework based upon the development of criteria which can be used to identify Broad Areas of Interest which will be assessed in further detail before the formal designation process is initiated. This is anticipated to be carried out at a more refined and detailed level through the Designated Maritime Area Plans (DMAPs) process.

At a strategic regional level, the RSES (RPO 10.24) supports an increase in the amount of new renewable energy sources in the Region. This includes, amongst others, the use of wind energy – both onshore and offshore:

RPO 10.24: Support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements.

Designated Maritime Area Plans (DMAPs)

As set out in the National Marine Planning Framework, in order to transition to a plan led spatial system for the future provision of offshore renewable energy infrastructure and technologies, the detailed planning for such uses will be provided through Designated Maritime Area Plans (DMAPs). These will take the form of regional marine spatial plans, and as confirmed in the draft OREDP II, the majority of sub-national forward marine planning will be developed through the DMAP process.

A DMAP is stated to be a management plan for a specific area of our marine waters and can be used to develop multi-activity area plans or to promote the use of specific activities, including offshore renewable energy. DMAPs once adopted will form part of the NMPF and become a binding consideration for marine decision makers and marine plan-makers.

Having regard to the above, the related content of the NMPF, and the provisions of Sections 20 to 29 of the Maritime Planning Act (2021) in relation to the preparation of DMAPs, EMRA would be of the consideration that given the overall scale and scope of the Draft OREDP II, greater clarity is required regarding the overarching preparatory structure for such plans at a regional level. This includes clarity relating to the key organisation(s) and/or agency or agencies that may potentially be designated as a 'competent authority', the role they will provide, and greater detail relating to the relevant stakeholders and public bodies that will be involved in the preparation of DMAP plans so as to achieve the vision and renewable energy targets set at national level over the period of this plan. The EMRA note that the provision of such detail may require coordination with the Department of Housing, Local Government and Heritage.

EMRA also notes that the recently published Policy Statement on the Framework for Phase Two Offshore Wind (March 2023) includes statements in Sections 5 and 8 that are relevant to the above;

'Offshore capacity to be developed under Phase Two will be accelerated through the designation of maritime areas that have been specifically identified for the purpose of offshore energy production by Government and approved by the Oireachtas.'

'Upon designation and approval by the Oireachtas, DMAPs will form part of the NMPF and provide statutory guidance to relevant authorities in the assessment of Phase Two development applications in respect of both offshore wind farms and associated offshore and onshore transmission infrastructure'

'The OREDP II will facilitate the identification of broad areas of interest for further detailed assessment as Designated Maritime Area Plans (DMAPs) as provided for in the MAP Act 2021. These will set out the pathway for the State to take a leading role in managing the development of ORE development.'

As expressed in a previous submission to the draft NMPF (June 2020), EMRA is of the view that Regional Assemblies have a unique role in the Irish planning system and offer an opportunity to provide strong stakeholder engagement across local authorities (including coastal planning authorities) and relevant agencies, and provide a role to strengthen the integration of marine and territorial plans over the lifetime of the RSES. As terrestrial and marine ecosystems are closely connected, the Regional Assemblies and the coastal local authorities have an important role in ensuring integration of land and marine planning within the Region and with Northern Ireland to ensure that management of coasts and marine waters is on an all-island basis.

The RSES Regional Policy Objective 7.1 sets out the significance of integrating marine spatial planning into future land use plans in the Region;

RPO 7.1: To ensure consistency and alignment between the upcoming National Maritime Spatial Plan (due in 2021) and regional approaches to marine spatial planning and to integrate the Marine Strategy Framework Directive and Marine Spatial Planning implementation into future land use plans in the Region in recognition of the opportunity to harness Ireland's ocean potential.

The valuable contribution that sustainable utilisation of marine resources for balanced regional development and quality of life is closely associated with effective engagement and the protection of the marine environment. This is recognised in Regional Policy Objective 7.2 which aims *“To achieve and maintain ‘Good Environmental Status’ for marine waters and to ensure the sustainable use of shared marine resources in the Region, and to promote the development of a cross-boundary and cross-border strategic management and stakeholder engagement framework to protect the marine environment.”*

Section 12 of the Draft OREDP II also confirms the adoption and implementation structure for the OREDP II once adopted. Table 11 provides an overview of implementation and adaptive management including various implementation groups, data sub-groups and environmental groups that will be set up to ensure delivery of the plan objectives. Membership of the groups has not yet been finalised. It is stated that other stakeholders including at a regional and local level may also provide input. With this in mind, EMRA would be supportive of providing input at a regional level where such a role would be found to be beneficial.

Broad Areas of Interest

Section 11 of the draft OREDP II outlines the criteria for the selection of ‘Broad Areas of Interest’. It appears the intention of such ‘Broad Areas of Interest’ is to identify potential areas at a national and strategic level that may be suitable for offshore renewable energy (ORE), to be assessed in greater detail at a regional level or local level through the ORE DMAPs process. In addition, the Assembly notes that the key objectives for the OREDP II are to:

- Assess the resource potential for ORE in Ireland’s maritime area.
- Provide an evidence base to facilitate the future identification of Broad Areas most suitable for the sustainable deployment of ORE in Ireland’s maritime area.
- Identify critical gaps in marine data or knowledge and recommend prioritised actions to close these gaps.

The Assembly notes that three potential Broad Areas of Interest for offshore renewable energy, have been identified and shown in Figure 11-1 of the draft OREDP II. It is noted that none of the three identified Broad Areas of Interest are located off the coast of the EMRA Region. The Broad Areas of Interest are;

- Celtic Sea East Broad Area Floating Wind (off Waterford, Wexford and Cork Coast)
- Mid-West Broad Area Floating Wind (Shannon/Foynes)
- North-West Broad Area Floating Wind (off Donegal Coast)

Having reviewed the criteria for selection, it is considered that;

- Greater detail and explanation are necessary in the plan to explain how the various criteria for selection resulted in the three broad areas of interest selected. While the various criteria used in the process is noted, there is a lack of explanation given as to why the final areas were selected. It should be clear from the selection process how the final indicative boundaries were arrived at.

- Notwithstanding the indication that the OREDP II document relates to the final phase i.e. the long-term or enduring plan-led regime for ORE beyond 2030, in relation to the EMRA region, there are currently 5 no. offshore wind energy projects that have received Maritime Area Consents (MAC) but have yet to receive a planning consent. These are i) the North Irish Sea Array (off Dublin, Meath and Louth), ii) Arklow Bank Wind Park Phase 2, iii) the Kish and Bray Banks (collectively Dublin Array), iv) Oriel Wind Farm (off the Louth coast), and v) Coding Wind Park (off the Wicklow town to Greystones coast). The role of such ORE projects that have a MAC should be further clarified in the OREDP II, and whether it is likely projects that have yet to receive planning consent will be subject to the DMAP process particularly where they are based on fixed turbine technology rather than floating wind technology, or the scenario arises whereby one or more of the aforementioned wind energy projects do not proceed beyond the MAC stage. If confirmed as the case, the Broad Areas of Interest should be amended to reflect the status of same.

It is further noted that the *'Policy Statement on the Framework for Phase Two Offshore Wind'* (March 2023) states on Page 23 that fixed bottom turbines can typically be deployed in water depths of 50-60 metres or less. Depths and technology will be reviewed but consideration in the near-term will have to focus on shallower waters of 60 metres or less particularly for early DMAPs.

Marine and the Economy

EMRA recognises that as an island nation, we are highly dependent on our seas and Ireland's marine sector or blue economy is an important and growing part of the national economy. Recent years have seen significant growth in the sector and increased spending on marine research. It is noted that *Harnessing our Ocean Wealth – An Integrated Marine Plan for Ireland (HOOW)* targets a doubling of the value of the maritime economy by 2030 including; shipping, maritime transport, sea fisheries, aquaculture, tourism and energy.

The RSES recognises the marine sector as a labour-intensive economic activity which is of particular importance to the Region, given its sensitivity for job creation, maintenance and sustainability. Chapter 6 Economy and Employment of the RSES highlights that development opportunities in the marine or blue economy relate to fishing, renewables, new applications for health and medicine, and tourism to name a few. Further, marine resources provide many non-commercial benefits too, for example amenity, biodiversity and climate regulation. Given the increasing demand for marine space, the draft OREDP II should enable stakeholders and the public to ensure a joined-up approach in planning and management, which is supported by the following Regional Policy Objective within the RSES;

RPO 6.22: EMRA support the preparation of the Marine Spatial Plan (MSP) to ensure alignment, and consistency between land use and ocean based planning, and to ensure co-ordination which supports the protection of the marine environment and the growth of the Marine economy.

Effective Integrated Land and Marine Planning is about planning when and where human activities take place at sea, ensuring these activities are as sustainable as possible and engaging stakeholders in the planning of maritime activities. One of the future challenges will be to align 'blue growth' with

conservation of biodiversity and ecosystem health, while adhering to the objectives of the Marine Strategy Framework Directive, Marine Spatial Planning and Water Framework Directives.

Fisheries and Aquaculture

Fishing is a substantial sub-sector in the Eastern and Midland Region, with Howth being one of six National Fishery Harbour Centres and a number of small fisheries clusters along the eastern seaboard including Wicklow, Clogherhead and Dún Laoghaire. While the traditional fishing industry faces challenges in relation to seasonal employment, fish stocks and coastal hazards, there are also opportunities for diversification and development of bio resources including seafood, aquaculture and offshore renewables. The draft OREDP II will need to take account of all potential impacts on fishing industries in the region when selecting areas suitable for offshore renewable energy and any supporting infrastructure required. In addition, the draft plan and any resultant DMAPs applicable to the region will need to take due regard to managing the environmental impacts of 'blue growth' on marine biodiversity, introduction and/ or spread of invasive species and increased pollution.

Ports

The National Planning Framework (NPF) highlights the maritime sector's key role within the economy as an important gateway for the movement of people and freight between Ireland and its trading partners. It is also noted that one of the key criteria for selecting the 'Broad Areas of Interest' in the Draft OREDP II is onshore infrastructure and port development. Both the NPF and the RSES recognise that Ireland's port and shipping services play an important role as enablers of economic growth. Irish ports are critical infrastructure for international trade, with over 90% of our international trade moving by sea and also serve as logistics and distribution hubs. It is also noted that the Eastern and Midland Region is strategically located on part of the trans-European transport network from Belfast to Rosslare Europort and is linked to the U.K. across the Irish Sea.

The Eastern and Midland Region is home to the largest sea port in the Country, Dublin Port, and also contains a number of regional ports of significance and smaller harbours. Dublin Port is recognised in the RSES as critical national facility, a key economic driver for the Region and the nation. As a major trading centre it has seen sustained growth with volumes expected to increase exponentially by 265% over the 30 years to 2040.

The recently published Policy Statement on the Framework for Phase Two Offshore Wind (March 2023) also recognises the crucial role ports will play in facilitating the necessary development of offshore renewable generation and grid infrastructure and their development will be supported through a new National Ports Policy to be prepared which will focus on actions and investment.

The draft OREDP II should recognise the status of Ports in the Region and provide supportive alignment with the following Regional Policy Objectives:

RPO 8.21: The EMRA will support the role of Dublin Port as a Port of National Significance (Tier 1 Port) and its continued commercial development, including limited expansion and improved road access, including the Southern Port Access Route.

RPO 8.22: The EMRA supports ports of Regional Significance that serve an important regional purpose and/or specialised trades or maritime tourism; and the accessibility requirements of regional ports within the Region, from within their regional catchments will be addressed through the provision of improved access routes, where necessary and improved access to the national and regional road networks. Opportunities for the use of rail, where such ports are connected to the rail network is also promoted.

RPO 8.23: The EMRA supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports.

RPO 8.24: The EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs.

Conclusion

The Regional Assembly welcomes the opportunity to engage on the process of preparing the Draft Offshore Renewable Energy Plan II. The officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcomes further opportunities to engage in the process of finalising the OREDP II and the related processes, including DMAPs, as documented above.

Regards,



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Eastern and Midland Regional Assembly
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