



*Making renewables Ireland's primary power source*

## Offshore Renewable Energy Development Plan – Mid Term Review Consultation Response

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18<sup>th</sup> December 2017

Now Ireland,  
  
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## Introduction

The National Offshore Wind Energy Association of Ireland (NOW Ireland) was established to promote the development of Ireland's substantial offshore wind resource and to ensure that our island leads the way in building a green energy economy. NOW Ireland was established by companies that have offshore wind farm projects under development in Irish Waters who were joined by national and international companies operating in the offshore wind supply chain sector.

The members of NOW Ireland welcome the mid-term review of the Offshore Renewable Energy Development Plan (OREDPA), and commend the significant level of consultation that has been a part of the review. NOW Ireland have been involved in the Offshore Renewable Energy Steering Group as an external stakeholder and were interviewed as part of the preparation of the consultation documents. In our response to the consultation we wish to make the following specific points in relation to the development of fixed offshore wind as a commercial technology available to make use of Ireland's significant offshore wind resources.

Recent offshore wind technology development has seen the commercial introduction of large capacity turbines with correspondingly high capacity factors that have significantly reduced the LCOE for fixed offshore wind projects, as evidenced in recent auction results in the UK and Europe. These technology developments combined with the ability to construct large scale projects offshore where land access and environmental constraints are less of a problem than onshore, means that Offshore wind offers scale that can be delivered quickly. This creates the following opportunities which should be advanced as part of the OREDPA.

- Reduced community opposition to renewable energy infrastructure roll out due to reduced environmental and social impacts of projects at remote offshore locations.
- Reduced requirement for multiple grid connections and the associated infrastructure required for multiple smaller scale onshore wind and solar projects.
- Strategic project locations close to demand centres, enables connections to the existing transmission system, avoiding the need for large scale grid upgrades and new high voltage transmission lines.
- Unlocks a new industry that will create a significant boost to the economy and job creation in the Irish Marine sector. A recent report undertaken by the Offshore Wind Catapult group in the UK found that the Gross Value Added (GVA) per GW of offshore wind deployed in the UK is £1.8bn for current projects and is expected to increase to £2.9bn/GW by 2030.

The mid-term review of the OREDPA presents an opportunity for the clarification of Ireland's policy in relation to the development of fixed offshore wind. The OREDPA report published in February 2014 suggests that the development opportunity for offshore wind to 2020 and beyond, is the potential to export energy to the United Kingdom in the first instance, with the possibility in the future of participation in the North West European energy market.

NOW Ireland suggest that the OREDPA be updated to include actions to develop fixed offshore wind energy projects in the near term to help Ireland achieve its 2020 and 2030 renewable energy and

emissions reduction goals. This will serve as a kick start to the development of the wider opportunities that our offshore renewable energy resources offer including technology development, energy export and the early development of supply chain opportunities.

## Specific Comments in Relation to Offshore Wind

### *Support Tariffs for Offshore Renewable Energy*

NOW Ireland has submitted a detailed response to the recent Renewable Energy Support Scheme (RESS) consultation which we have appended to this response. NOW Ireland is a founding member of the newly established Renewable Energy Consumers and Producers (RECAP) group established to promote the development of Ireland's renewable energy resources across the full spectrum of technologies. We have also attached the RECAP group's response to the RESS consultation which outlines the need for greater ambition in the development of renewable energy policy in Ireland.

### *Renewable Energy Export*

The OREDP and accompanying SEA has identified Ireland's huge untapped offshore wind resource, which can be delivered with existing technology with no significant social or environmental impacts. The Strategic Environmental Assessment (SEA) of the potential for the development of 4,500MW of fixed offshore wind energy in Ireland concluded that it would be possible to develop this capacity without any likely significant adverse effect on the environment. Including wave and tidal technologies and floating offshore wind off the West coast there is the potential for an additional 20 to 30GW of renewable energy generating potential. This is a vast resource for a country the size of Ireland and exceeds the likely demand required on the island for the foreseeable future, notwithstanding the increase in renewable sourced electricity generation which will be needed to meet increasing demand and the electrification of transport and heat.

With additional interconnection to the UK and continental Europe together with the roll out of an integrated electricity market following the introduction of I-SEM, Ireland is well positioned to capitalise on its offshore renewable energy resources. The development of additional interconnection should be a priority for electricity policy in Ireland, it is key to enabling an increasing penetration of non-dispatchable renewable power onto Ireland's grid system and will provide the infrastructure needed to enable exports.

To kick start the development of this export potential Ireland should incentivise the initial development of offshore wind capacity needed to meet national renewable energy and emission reduction targets for 2020 and 2030.

### *Supply Chain development*

The initial work undertaken as part of the OREDP action plan has identified the potential for the development of a supply chain sector for marine renewable energy in Ireland. Enabling early mover, fixed offshore wind projects will act as a clear signal that Ireland is open for business in terms of the

development of its offshore renewable energy resources. This will act as a stimulus to the multi-billion Euro supply chain opportunity that exists in the development of Irish marine renewables.

#### *Planning and Consent*

NOW Ireland welcomes the commitment of the Department of Housing Planning and Local Government to improve the consenting process for development in the marine area and in particular the process for the consent of Irish offshore renewable energy projects, which are a significant as yet underutilised indigenous energy resource. The delays that have been encountered by projects in the current system highlight the need for a more streamlined system to be implemented. We would however note that projects that have progressed or are progressing under the existing Foreshore Acts should continue under that legislation, which is no less comprehensive than the proposed MAFA bill in terms of environmental impact assessment and public participation. In fact, the Foreshore Acts are more onerous for developments in that there are no set timelines for the consideration of applications.

#### **Conclusions**

Overall, the mid-term review of the OREDP is welcome and presents an opportunity for the clarification of Ireland's policy in relation to the development of offshore wind. The members of NOW Ireland have identified some specific issues in the proposed policy as outlined in this response. We would welcome further engagement with the Offshore Renewable Energy Steering Group and the Department prior to the finalisation of the review. NOW Ireland is currently reconfiguring with new and former members joining the organisation, reflecting the renewed interest in Offshore wind in Ireland. We would welcome the opportunity to meet with the Department in the New Year to discuss the potential for the development of Ireland's offshore wind resources.