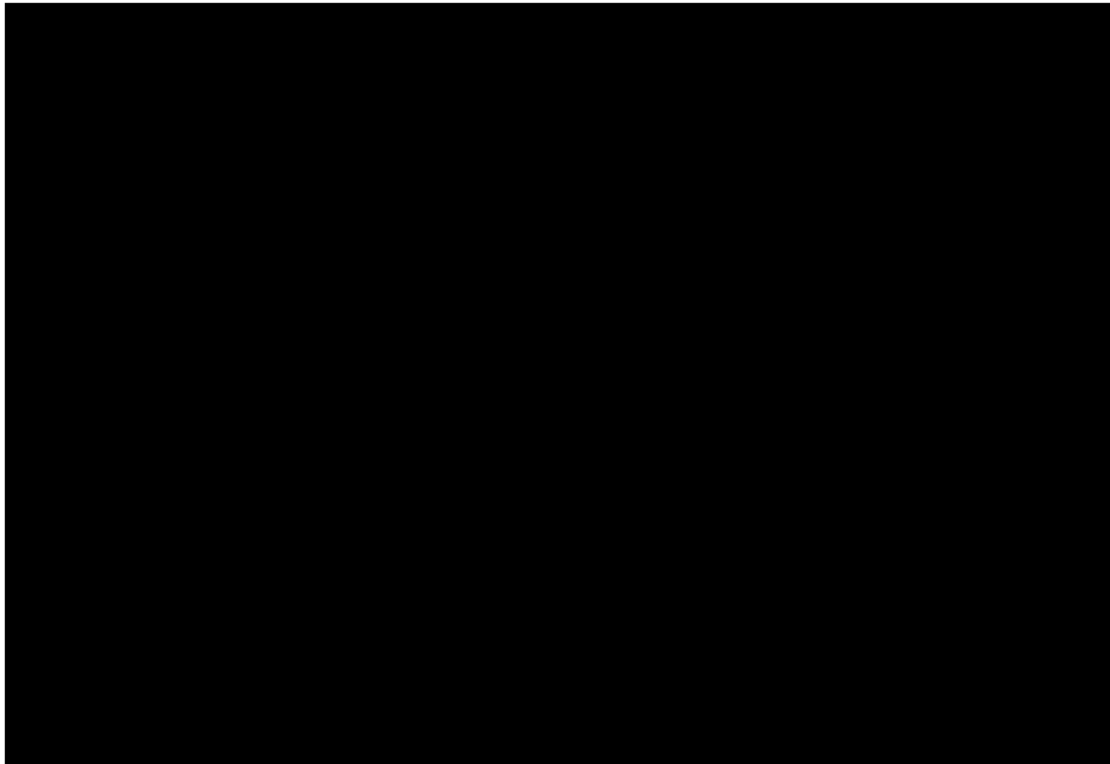




**Response to the Future Framework Public Consultation
February 26th, 2024**

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1 Introduction

Valentia Island Energy (VIE) appreciates and recognises the opportunity presented by the Future Framework Public Consultation and is keen to participate fully. The Draft Offshore Renewable Energy Future Framework policy statement has articulated an ambitious objective, aiming to implement up to 20GW of offshore wind generation by 2040, with an extension target of at least 37GW by 2050.

VIE Ltd represents a collaborative endeavour between Valentia Island Energy Co-op (VIEC) and Energy Co-operatives Ireland, operating a community-led model. The primary objective of this partnership is to enhance community involvement while deriving maximum benefit to assist Ireland in meeting its commitments under the Climate Action Plan through development of offshore wind resources adjacent to the Island of Valentia.

In 2018, the community of Valentia Island collectively recognized the potential of renewable energy to catalyse social and economic progress as well as ensuring energy security for the island and the wider South Kerry region. The community's aspirations can be summarized as follows:

- Establishing a framework for community-owned energy systems to facilitate access to locally produced, affordable energy.
- Creating substantial, sustainable local employment opportunities.
- Retaining the annual energy expenditure of an estimated €1.2M within the local island economy.
- Facilitating the decarbonisation of communities in South Kerry.

Several of these aspirations resonate with the Draft Offshore Renewable Energy Future Framework policy statement with particular emphasis on:

- Decarbonizing the Irish economy in alignment with legally binding national and international climate targets.
- Ensuring long-term energy security.
- Fostering green industrial opportunities for domestic energy consumption and export markets.

Given the modest population of 655 individuals on Valentia Island¹, establishing a community-owned energy system poses inherent challenges. Undeterred, the voluntary group looked to the market for ways of realising this ambition. A community-led approach to developing offshore wind, while not easy, but with patience and perseverance will ultimately lead to great rewards. The innovative community-led approach to developing an offshore wind array west of Valentia has proven attractive and a viable proposal several wind energy developers to date. The distinctiveness of the community-led model has served as a key attraction for developers, underscoring its significance in the absence of a conventional framework. In light of the foregoing, VIE respectfully urges continued engagement during and beyond the consultation process to delineate a clear pathway for the inclusion of the Valentia Wind Array in a Designated Maritime Area Plan (DMAP). Further engagement will be

¹ <https://visual.cso.ie/?body=entity/ima/cop/2022&boundary=C04167V04938&guid=2ae19629-2239-13a3-e055-000000000001>

instrumental in realizing the shared vision of a sustainable and community-centric energy future for Valentia Island and its wider environs.

2 Community Benefit Model

Through completing the initial steps of this project, site selection, constraint analysis and initial stakeholder management, VIE became the sole developer of this project. By partnering with an established industry body, VIE will ensure compliance with Marine Area Consent (MAC) licence application requirements and provide a mechanism to transfer capital from the project enabling further investment by VIEC and Energy Co-ops Ireland in community-led energy initiatives. For VIEC and its members, this capital will be used to realise the long held ambition of creating a 100% community owned renewable energy system. Such a development could include solar power generation incorporated with a micro grid for the Island.

Further growth of this project can be achieved following on from the success demonstrated of the community-led model, by inviting membership from neighbouring communities and replicating the model and its principles across the wider South Kerry area. Enabling community ownership of renewable energy will garner the following additional benefits to the community on realisation of this project:

- Access to Community Benefit Funds as mandated in the governments ORESS model. These funds will be accessible to community groups and societies.
- As part of the partnering process, the community may have the opportunity to retain a small ownership of the project and in doing so could generate dividends for the community.
- Valentia Harbour is a naturally deep harbour, a resource that is underutilised in the absence of fishing. Recently the development of a marina in the harbour has begun and the infrastructure could facilitate crew transfer and maintenance vessels for the proposed offshore wind farm.
- The opportunities for job creation as a result of offshore wind development are widely documented and understood.

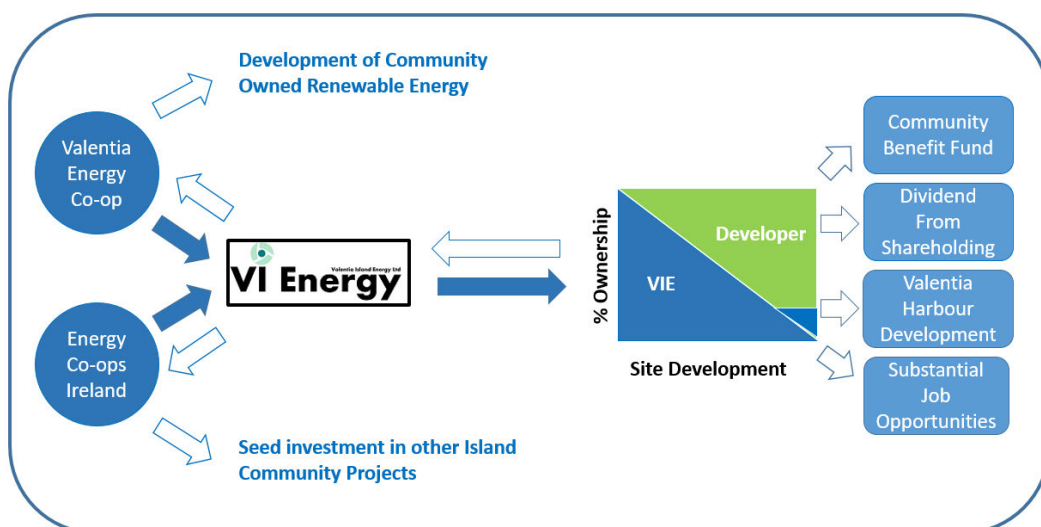


Fig1: Value Exchange Model for the community led VIE offshore project

3 Right Technology, Right Time, Right Place

The scoping document for this consultation states,

“Selecting the best location for offshore renewable energy projects involves a comprehensive assessment of technical feasibility, environmental sustainability, socio-economic impacts, and regulatory compliance. Collaboration between developers, government agencies, local communities, and environmental organizations is essential to ensure that offshore renewable energy projects are sited and operated responsibly.”

We firmly believe that this project will address the main themes in this statement. In the previous section, the positive socio-economic impacts to Valentia and South Kerry were highlighted. In this section, we respectfully argue that the area of investigation is the best location for the targeted technical solution whilst ensuring environmental sustainability remains paramount. VIE believes this site presents the ideal opportunity for the right technology, in the right place, at the right time.

The strategic selection of this site by VIE is based on excellent wind resources and minimal constraints. Consideration for the lack of capacity on the grid in the South West as to the viability of hydrogen production in this area were also taken into account.

The IEA’s report “Hydrogen in Northwest Europe, A Vision Towards 2030”² analysis states
“In combination with declining costs for electrolyzers, hydrogen production costs from offshore wind could fall to EUR 2.5-3.5/kg H₂.”

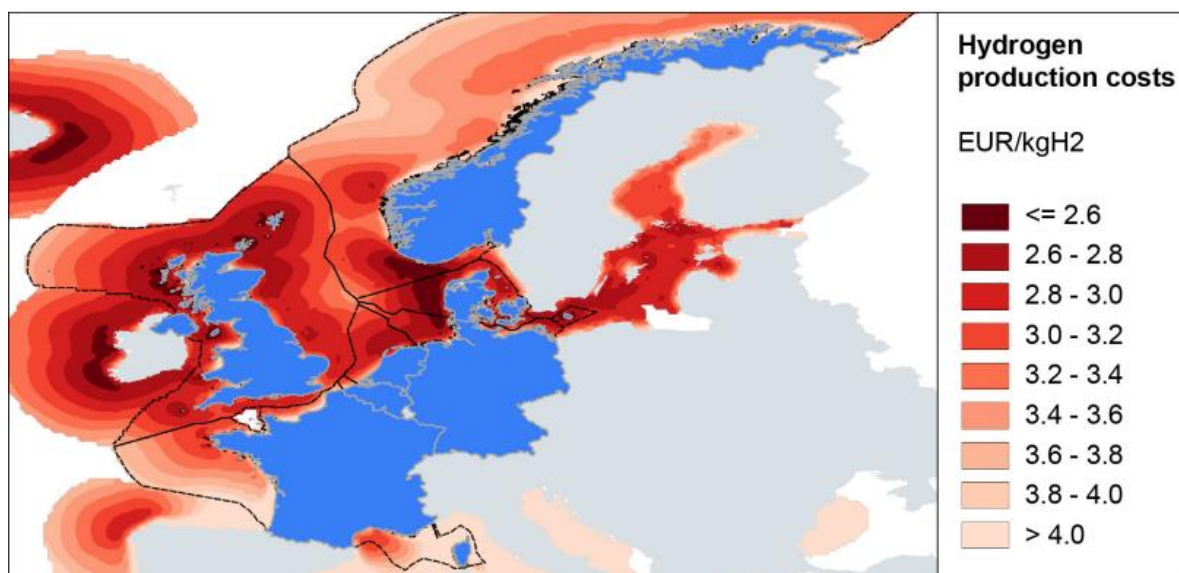


Fig2: Hydrogen Production Costs From Offshore Wind (Accelerated Scenario, 2030) Source: IEA, Hydrogen in Northwest Europe, a Vision Towards 2030

² [https://iea.blob.core.windows.net/assets/ccbc3b01-7403-4c15-90a2-af11dfb92c62/Hydrogen in North Western Europe.pdf](https://iea.blob.core.windows.net/assets/ccbc3b01-7403-4c15-90a2-af11dfb92c62/Hydrogen%20in%20North%20Western%20Europe.pdf)

In September 2023, the Energy Futures Lab of Imperial College London published “Enabling the UK to become the Saudi Arabia of Wind? The cost of green hydrogen from offshore wind”³. This report examined and assessed sites in the North Atlantic for their competitiveness in terms of Levelised Cost of Hydrogen (LCOH). The findings demonstrated the South West coast of Ireland to be one of the best and economically competitive sites for LCOH not only in Northern Europe, but globally.



Fig: Hydrogen Production Costs From Offshore Wind (Accelerated Scenario, 2030) Source: IEA, Hydrogen in Northwest Europe, a Vision Towards 2030

While the southwest coast of Ireland is known for its exceptional biodiversity, it is essential to recognise that biodiversity is distributed across the entire island of Ireland, with each region offering unique ecosystems and species. The constraint analysis conducted on behalf of VIE included consideration of the location of special areas of conservation (SAC). The area of investigation for this project, located either side to the 12 nautical mile line, provides sufficient separation from all SACs including the Skellig Islands. Every offshore wind project has a responsibility to identify risks to the relevant areas of biodiversity and provide appropriate mitigating measures.

³ <https://www.imperial.ac.uk/energy-futures-lab/reports/briefing-papers/paper-12/#:~:text=This%20briefing%20paper%2C%20produced%20by,UK%20and%20its%20territorial%20waters>

Floating offshore wind has the potential to promote biodiversity in several ways:

- **Reduced Habitat Disturbance:** Unlike traditional offshore wind farms, floating offshore wind turbines have a smaller environmental footprint and can be located further offshore, reducing habitat disturbance along coastlines.
- **Artificial Reefs:** Floating offshore wind installations can act as artificial reefs, providing habitats for various marine species. The structures can attract fish and other marine organisms, creating new ecosystems where they can thrive.
- **Minimal Seabed Impact:** Since floating wind turbines are not anchored to the seabed like traditional offshore turbines, they have minimal impact on the seabed and benthic habitats. This allows marine life on the seabed to remain undisturbed.
- **Reduced Noise Pollution:** Floating offshore wind turbines typically produce less noise compared to traditional offshore wind farms, which can benefit marine mammals and other sensitive species that are sensitive to underwater noise.
- **Maintaining Migration Routes:** Floating offshore wind farms can be designed and located in ways that allow for the maintenance of important migration routes for marine animals, helping to preserve their natural patterns of movement.
- **Potential for Coexistence with Fishing:** In some cases, floating offshore wind farms may even provide additional opportunities for fishing, as they can act as artificial reefs attracting fish populations.

4 Conclusion and Recommendations

For 100 years between 1866 and 1966, Valentia Island was the centre of global communications following the laying of the first transatlantic telegraph cable. This was realised through great endeavour, ambitious innovation and bravery. The technical feasibility of the laying and operation of the cable was not clear, however significant investment and constant belief in the project, the cable was laid and the world was forever changed. For the 100 years of operation the cable station enabled a thriving community to grow and realise socio economic benefits. The success of the Valentia cable station resulted in cable stations opening in Waterville and Ballinskelligs along with the establishment of a telegraph operator educational college in Cahersiveen allowing the benefits of the project to be realised across South Kerry. South Kerry trained telegraph engineers and operators progressed to grow and establish telegraph operations globally.

Since the closure of the cable station in 1966 and the gradual decline in fishing from Valentia Harbour, the fabric of the community has slowly declined. With reducing numbers in our schools and an ageing population, Valentia and South Kerry need something to change their destiny. This proposed offshore wind development can replicate the significance and impact of the transatlantic cable project. Unlike the cable project however, the technical feasibility of the floating offshore and hydrogen technology is much more advanced and understood than that of the cable project. The location of the area of investigation meets all the criteria for this to be one of the best sites globally to produce hydrogen from offshore wind, and this is recognised by the significant interest from the industry to partner with VIE in the development of the site.

Upon successful development, this project will be a springboard for sustainable social and economic development in Valentia and South Kerry. The opportunity to develop community owned renewable energy infrastructure is the stand out benefit, but the hundreds of jobs that could be realised through the further development of Valentia marina, harbour and economic spin-offs would alter the demographics of the South Kerry area. This project can also enhance a developing tourism industry. Offshore energy developments have become sustainable tourism attractions.

Every offshore wind development, no matter where it is developed must consider biodiversity. We believe this project can be developed in a safe and responsible way in relation to biodiversity, and in fact can be a way to enhance biodiversity, and not risk it.

This project is truly unique. It is a community-led offshore wind development. Given its uniqueness, we respectfully request that beyond this submission, we could further engage with the consultation so as to understand our ambitions fully. This would be an opportunity to have a multi-disciplined conversation on the potential of this site and how potential risks could be mitigated.