

Future Framework consultation
Offshore Environment and Future Development
Department of the Environment, Climate and Communications
29-31 Adelaide Road
Dublin 2
D02 X285

19 February 2024

RE: Draft Offshore Renewable Energy Future Framework Policy Statement

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 (SDGs), five of which have been identified by the Chambers Ireland network.

It is very positive to see developments and this level of forward planning in Offshore Renewable Energy (ORE) space that will strengthen the sector and propel Ireland forward on a clear trajectory to harness the advantages and opportunities that ORE offers. This draft Future Framework Policy Statement should provide a robust foundation for Ireland's ORE development, outlining targets, procedures, resourcing, data strategy, domestic and industrial considerations, export potential, and economic returns. It is essential that a clear framework is developed to enable the collaboration necessary to enable this sector.

There are however some areas that require further attention in particular the geographical area being covered by the next Designated Maritime Area Plan (DMAP) and the skills needs that will emerge as ORE develops in Ireland.

Further to this, our industry members have voiced their concerns that additional time and more extensive consultation is required to support the Draft Future Framework and respond to the accompanying questions sufficiently. In support of their concerns and concerns raised by Wing Energy Ireland, Cork Chamber is specifically calling for DECC to provide:

1. An extension to the consultation period.
2. Consider publishing a high-level action plan in March which is agreed upon by both Government and industry, setting out the immediate priorities in the near term. The more in-depth and robust plan can then be further worked on in partnership over the coming months.
3. Joint Government and industry forum to deliver the Future Framework.

Cork Chamber welcomes the opportunity to contribute to this consultation, our submission has been guided by feedback from our members based in the offshore renewable energy sector, and we therefore ask that the below observations are duly considered.

We also remain at your disposal to share any additional insights from our member businesses.

Yours Sincerely,

A large black rectangular redaction box covering the signature area.

Two lines of black rectangular redaction boxes covering contact information.

Cork Chamber's Response

Re-instilling Investor Confidence

Throughout 2023 there were changes in policy that shook investor confidence. This framework is therefore critically important to re-establishing confidence in the Irish market. To have such an effect, certainty and a clear plan with realistic targets and a deliverable regime for offshore renewable energy (ORE) planning and deployment is required. A consistent, cohesive and planned approach regarding the respective Designated Marine Area Plans (DMAPs) in delivering the 2040 and 2050 targets and accompanying timelines must be delivered.

The only and current South Coast DMAP is limited to facilitating fixed bottom only with depths of less than 80m, thus limiting Ireland's capacity. There is an urgent need for DECC to accelerate the development of the planned DMAP roadmap (action 5) and the associated ORESS auctions with clear timelines for delivery to ensure the national targets can be met. The next DMAP should at a minimum unlock the supply chain and route to market opportunities available in Cork Harbour and the south coast.

Industry expertise should be utilised at every turn in the delivery and planning of ORE, the associated DMAPs and, within the cross departmental Offshore Wind Task Force (OWTF) chaired by DECC. The development of 37GW of ORE by 2050 is a huge undertaking that poses numerous risks and thus requires industry input and engagement from the start and at every turn thereafter.

The UK has become a leader in ORE due to long standing political commitment, an enduring framework of auctions, deep collaboration at a national policy and strategic level and joint initiatives between Government and industry. Specifically, the UK Offshore Wind industry Council¹, which is chaired by Industry and Government, has been hugely beneficial to the industry and to instilling investor confidence. It is vital that the state leverages industry expertise and the UK structured is a best practice that Cork Chamber and our members would urge to be adopted.

The framework should outline a detailed plan to reach the targets for 2040 and 2050. However, the Draft Future Framework simply presents a collection of separate actions and ongoing initiatives managed by the government's OWTF. This lack of coherence fails to provide clear direction on future leasing arrangements such as maritime area consent (MAC), marine spatial planning, development consent, market access, or grid arrangements needed to secure the planned additional 9.5GW of capacity between 2026 and 2030 or to achieve 20GW of deployment by 2040.

The presented Draft Framework and lack of a coherent plan risks further damaging investor confidence and exacerbating uncertainties and integration regarding planned-led development, seabed allocation, grid connection, development consenting and a route to market. The final version of the Future Framework must set out a robust roadmap bringing together these processes in a coherent and unified manner. To enable this, it is vital that

¹ [UK Offshore Wind Industry Council](#)

industry's voice is heard in the OWTF as has been done in successful international models and in Ireland's other successful industries such as the financial services sector.

Successor ORESS Scheme

The proposed updates in the Draft ORE Future Framework aim to enhance the pre-development process for ORE projects, reduce risks and bolster investor confidence. These updates include actions such as creating a roadmap for future plans, streamlining consent procedures, establishing competitive processes, scheduling tenders, devising successor schemes, and exploring infrastructure investments.

Currently, there are challenges with the timing of certain activities, particularly regarding auctions which are held at very early stages thus requiring supply chain projections to be predicted 5 to 6 years in advance. A more linear approach post-Phase 2, seen in other successful international models, could mitigate these risks by aligning capacity procurement or route to market confirmation closer to financial close. This approach would allow the successor to ORESS to be decoupled from seabed exclusivity allocation via a competitive MAC process and scheduled after securing planning consent and grid capacity.

The current model lacks flexibility to address project attrition effectively. To mitigate these risks and ensure value for money in the next ORESS, a strong pipeline of viable development opportunities should be established. A continuous programme of regional DMAPs, beginning with the south coast to activate Cork Harbour, would aid in addressing project attrition and ensure national targets are met.

Grid Infrastructure

The delivery of offshore grid infrastructure is vital to enabling the development of the ORE industry and achieving Ireland's climate targets. Solutions and advancements are needed regarding the innovation of grid infrastructure and management systems to effectively integrate intermittent offshore wind energy into the national power grid, and the development of cost-effective energy storage solutions to store excess energy. Developers need to know the availability model, cost base and penalties for non-delivery of grid far in advance of any auctions for seabed allocation, ORESS or planning.

Private wires should be facilitated via Corporate Power Purchase Agreements. These initiatives would stimulate local industry growth and attract inward investment, thereby diversifying and sustaining Ireland's industrial base and overall appeal. This is particularly crucial for regional development, given that the initial ORE projects will be based in the east and southeast coasts during Phases 1 and 2.

Export Potential

The future framework needs to provide further context in how greater electrical connection via interconnectors will be achieved. Clarity is still required regarding the delivery of interconnector projects within this framework in terms of seabed, MACs and planning.

Clarity and predictable consenting and regulatory frameworks can be provided by prioritising the streamlining of consenting processes for interconnector projects alongside ORE development.

Port Development

Ports are key enablers for the development of the ORE industry, supporting the supply chain, forming industrial clusters and meeting national targets. They are essential for the construction and deployment of ORE and maintenance and decommissioning activities throughout the project lifecycle.

Currently, Belfast is the only port on the Island of Ireland fully ready to service offshore wind farms. Ports across Ireland, including Cork, have or are preparing operational plans and new facilities to serve the ORE sector. Proactive port investment and clarity in relation to funding must be provided for these projects.

Cork Harbour, including Bantry, are nationally important for delivering our climate and energy targets. The energy, port, grid access, education, and research infrastructure is already in place in Cork. Cork Harbour's strategic location as a gateway to the EU and Ireland's enormous maritime jurisdiction, and the complementary scale and location of Bantry Bay with its deep water combine to make Cork a designated national renewable energy hub and a central plank towards delivering Ireland's and the EU's climate action targets.

With its unique position as the world's second-largest natural harbour, the Port of Cork has a key role to play in Ireland's offshore wind and hydrogen industry. The Port of Cork is unique as the only Irish Port that has full planning permission and foreshore lease for two additional quayside berths in Ringaskiddy which need to be accelerated to facilitate the deployment of the country's first ORE projects for 2030 and beyond. Investment in the Port must be delivered to capture this potential.

A failure to move quickly to upgrade our ports for this capacity could see us lose out on the major investment and job creation that will be generated by offshore renewables, to ports in neighbouring countries. Government needs to move quickly to ensure investment in our major ports to deliver both on our climate targets and the economic growth associated with renewables development.

Without the necessary infrastructure in place in advance, ORE developers will not sign up to a contract to use a port for development. This is a chicken and egg situation as no lender will fund such port infrastructure developments without a guaranteed repayment mechanism. In these circumstances the State should consider providing funding or a loan guarantee.

We have a number of recommendations based on input and direct feedback from the Port of Cork that would best support ports to develop the necessary infrastructure for the facilitation of ORE:

- A more flexible approach in terms of how the port sector is funded. Urgent change is required to current National Ports Policy as Government funding is required to build

out infrastructure to support the ORE sector in line with State Aid exemptions under Art.45 (EU) No.1315/2013. Infrastructure required includes quayside, laydown area and storage areas for marshalling and assembly of ORE components. Such port infrastructure will not only facilitate Ireland meeting its climate action targets around ORE, but it will also contribute to the significant opportunities outlined in the Government's Industrialisation plan around this sector. New ORE revenue streams will also significantly contribute to the regional economy and local employment. Irish ports are, due to their commercial semi-state status/lack of State Aid exemptions, placed at a disadvantage compared to other EU member states and other national non-commercial ports in competing to provide port infrastructure to support ORE in Irish waters.

- Turnaround timelines on decisions to grant foreshore leases, licences and MACs urgently needs to be improved to allow ports to develop infrastructure in a timely fashion.
- A new MARA provision to be introduced whereby ports with planning permission already in place can apply for a MAC.
- Government to resource the various planning authorities and the statutory consultee agencies to ensure that planning applications are assessed within the statutory planning timeline to allow ports to develop infrastructure in a timely fashion, Ports being strategic assets.
- A dedicated foreshore planning policy to include timely consents to foreshore licences, leases and dredging permits would increase the port sector's ability to respond to the changing infrastructure needs caused by ORE and climate change more efficiently.
- To facilitate ORE, the Government needs to ensure Irish ports designated as EU Core TEN-T Network ports have adequate hinterland connectivity, such as the M28 to Ringaskiddy and R624 to Belvelly Cobh.

Skills

Developing a skilled workforce is essential for the successful development of offshore renewable energy projects. It can drive innovation, ensure safety and compliance, stimulate economic growth, and create opportunities for local communities. The establishment of development sites should therefore consider access to key components of the supply chain, such as jobs and skills. This includes a particular emphasis on educating and empowering a greater proportion of the local Irish workforce, thereby fostering innovation.

An anticipated surge in the Irish maritime sector, driven by the expansion of offshore renewables, underscores the need for Ireland to be prepared to provide an abundant talent pool to support this growth.

Cork Harbour, the second-largest natural harbour in the world after Sydney, boasts a rich history of shipping. This heritage positions both Cork and Ireland as prime beneficiaries of

the burgeoning maritime business ecosystem. In addition, the presence of the National Maritime College of Ireland (NMCI) (located within the Munster Technological University) in Ringaskiddy further supports the need to consider the Cork area as an area of great potential for the growth of the ORE space. In addition, the NMCI is already considering their role in supplying the education facilities wherever they are needed across the country via satellite education facilities on the east and west coast². It is essential therefore that this draft framework considers the need for funding for the education sector around Offshore Renewable Energy.

The BVG Associates Skills Needs Report (Jan 2024)³ report recommends that the government takes an industry-led approach to skills development in the offshore wind sector. This would involve using the participation of the offshore wind industry to guide any interventions in skills development. This report reiterates the need for government funding in the development of a skills base as it could reduce the risk associated with investing in skills and encourage companies to invest in local talent.

This report recommends this approach which it says will lead to better employment outcomes by ensuring that the necessary skills are available when needed. The report also suggests several short, medium, and long-term recommendations to address skills shortages in the offshore wind sector. These include establishing a skills development fund, attracting workers from abroad, building industry and market confidence, ensuring offshore specialisms are covered in public education and private training providers, and monitoring local content levels over time to help enable an adaptive skills response. It is essential therefore that these considerations are taken into account in the development of this framework.

² [Maritime College head: Ireland must seize opportunities presented by major offshore projects](#)

³ [Building our Potential Ireland's Offshore Wind Skills and Talent Needs](#)