



COMHAIRLE | CLARE  
CONTAE AN CHLÁIR | COUNTY COUNCIL

Future Framework consultation  
Offshore Environment and Future Development  
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### Re: Submission to ORE Future Framework Consultation

A Chara,

Please find attached a submission from Clare County Council's Economic Directorate which also includes observations made by Elected Members on the ORE Future Framework Consultation.

Clare County Council welcomes the opportunity to input to the development of the new Policy Statement for Ireland's offshore renewable energy (ORE) future, especially given our geographical advantages to facilitate offshore renewable energy development. It is critical that the communities most affected by the future development of the ORE sector are consulted at a local level and the policies around this need to include for public consultation in the coastal communities most impacted in the future.

If Ireland's strategy for tackling climate change and ensuring a Just Transition away from fossil fuels in a timely manner is to be achieved, then Ireland needs to ensure offshore wind and in particular Offshore Floating Wind is *fully embraced* in our future plans.

### Designated Marine Area Plans (DMAPs)

The Future Framework Consultative Document fails to provide a meaningful plan or roadmap for progressing fixed bottom offshore wind outside of the South Coast or floating offshore wind in any location. The recently launched Shannon Estuary Economic Taskforce Report highlighted the significance of the Shannon Estuary and the ambition to become world leaders in development of Offshore Wind Energy off the west coast. The Shannon Estuary is home to key infrastructure (including but not limited to a Tier-1 port, six main terminal facilities and significant deep-water quayside and zoned industrial landbanks and 1.5GW of existing electrical transmission capacity connecting Moneypoint and Tarbert power stations to the national grid). Appendix 5 of the Shannon Estuary Economic Taskforce Report lists as a specific action for a DMAP for 'Mid-West (Shannon/Foynes area)'

**An Stiúrthóireacht Forbairt Gheilleagrach**

Áras Contae an Chláir, Bóthar Nua, Inis, Co. an Chláir, V95 DXP2

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*to be commenced to encompass existing projects in development and an extension of the maximum depth to 100m+ (up to 200m). DMAP should be completed within a 12-month period.”.* The draft Framework should prioritise the area around the Shannon Estuary as a priority in terms of developing a DMAP in line with the findings of the Shannon Estuary Economic Taskforce Report.

Clare County Council has a long history in advocating for a Plan-Led approach to the sustainable planning and development of not only our terrestrial lands but also our maritime space through the preparation of the first integrated strategic plan for the Shannon Estuary, the SIFP.

Government has now set ambitious goals and targets to achieve a climate neutral economy which can only be achieved through a plan-led approach to the emerging offshore wind, wave, and tidal energy sectors.

The sense of urgency to deliver on these ambitious climate action targets has never been higher and the scale of the resource available to capitalise on, is hugely significant. If Government is serious on delivering the ambitious programme for government which includes the delivery of 5 gigawatts of offshore wind by 2030 it is our view that Coastal Planning Authorities should be designated as a matter of urgency and a clear timeline as to the planned role out of the required DMAPs laid out within the Framework.

Table 2 of the Framework outlines the plan-led process components during the ORE development stages. However, many of these stages are dependent on the preparation of a DMAP or require a DMAP as a precursor. In the absence of a timeline for the preparation of a relevant DMAP how can Ports, developers, innovators, and investors proceed with exploring the potential for the ORE sector in terms of development consent without a clear timeframe within which a DMAP will be developed? In addition, Coastal Planning Authorities or Local Government have not been included in this table despite having a consenting role and a clearly defined function as outlined in the MAP Act.

At the Seafarers Conference recently held in Limerick on the 22<sup>nd</sup> of February Minister for Enterprise, Trade and Employment Simon Coveney in his opening address indicated that DECC were looking at how we can accelerate a West Coast DMAP including costs. A timeline for this acceleration should be included within the final Framework. Minister Coveney further added that the DMAP/Plan-led approach would de-risk the sector and ensure the vast potential would be realised by 2030. However, given the significant lead in time required to prepare these strategic plans and their associated environmental assessment unless the selection of DMAPs is based on the work already done under OREDP II and data collected under data procurement rounds then it won't be possible to achieve or realise our national targets by 2030. The priority should be for the development of DMAPs in locations which have access to sufficient grid and/or opportunities for alternative route to markets and to significant energy demand and/or can accommodate industrial development to create this demand, (e.g., Shannon Estuary on the west coast). While we fully appreciate the need to move away from a developer led approach to a plan led approach the identification of sites within the DMAP while being technologically agnostic should have known depth profiles. Identifying project areas will improve pipeline visibility and give investor confidence in the Irish market in terms of future site locations. It

will allow a more robust SEA process which could account for the cumulative impacts of the overall project areas.

### **Marine Data**

With respect to data acquisition, we cannot underestimate the urgency in commencing surveys, field work and the acquisition of technical data to inform the DMAP process and any projects that may arise. There is a vast deficit within our marine environment in terms of environmental and socio-economic data that will take years and significant resources to acquire. Strategic Plans such as DMAPs together with Planning Applications must be based on up-to-date ecological reports and survey data. While it is difficult to set a specific timeframe over which reports or survey data should be considered valid, as this will vary in different circumstances, it is generally accepted that reports and survey data more than 3 years old will be unlikely to be still valid and would most likely need to be updated. This is in line with recommendations from CIEEM – the Chartered Institute of Ecology and Environmental Management. Data ranging from 18 months to 3 years may need a site visit and an update of desk study information. The key issue here is in ensuring both the DMAP process and the data acquisition happen in tandem to ensure the validity of the data in the associated environmental assessments together with ensuring there is a reduced risk of challenge or judicial review based on the validity of the data at least. Notwithstanding that other challenges may be brought.

### **Existing Infrastructure**

Ireland's coastline is covered in a necklace of smaller fishing ports, harbours, jetties and piers all of which can play a part in the enabling infrastructure required to facilitate the operation and maintenance associated with the establishment of the ORE sector. Building on the National Marine Planning Framework and the Marine Atlas an analysis/audit of these key pieces of infrastructure and their associated zoned lands should be undertaken to plan for their potential role into the future. Policy should look at protecting the existing port network along the coast to ensure all future opportunities are availed of regardless of the technology proposed or the energy source targeted.

### **Community Benefits**

The analysis in terms of the return to the State and community benefits is welcomed by Clare County Council and its members. In particular, the variety of uses as outlined under section 4.1 to include for improving local infrastructure, skills and training within the community or other community support programmes is seen as a key positive under the Community Benefit Fund. While Action 21 is welcomed, further Actions should be included around mandated contributions to ensure all sectors of society and communities can benefit in a fair and transparent manner. The administration of these funds will need to be centrally managed given the potential scale of the economic benefit over the operational life of the project. Of key interest to Clare County Council is the mention of skills and training within the community. Any Community Benefit Fund should be linked with transitioning sectors of the community most affected by change as well as the reskilling/upskilling of areas to be economically available to new forms of employment linked with ORE. There is also an opportunity now for the State to lead out on a new approach to such Community Benefit Schemes away from the approach which has been seen associated with terrestrial windfarms which are centred on financial gain, important though it is. A new model or approach to include for policy which looks to create

alternative job opportunities based around the key areas identified for ORE which could look towards the co-location of industries and stakeholders such as inshore fishing and tourism or recreation such as heated outdoor pools to name a few.

**Jobs and Skills**

ESB Moneypoint has most recently signalled its advancement in a transition away from heavy carbon producing fossil fuels with its application to An Bord Pleanála for Strategic Infrastructure Development (SID) to convert Moneypoint from a coal-burning power generating station to one powered by HFO for the years 2024-2029. The transition will see a 12 per cent lower emissions intensity than the existing coal-fired plant and present lower emissions through transition to HFO than a ‘do nothing’ scenario with continued use of coal. However, this transition is part of Ireland’s “security of Supply” and therefore will run for limited hours from late 2024 until the end of 2029.

The ethos behind a Just Transition is that no community should be left behind. The communities in West Clare and those surrounding the Moneypoint facility have supported it since its inception in 1985.

Early engagement with our local communities to understand how people will be affected by this transition to a low carbon future and how best we can “*build back better and ensure Just Energy and Climate Transitions*” for all is vital as part of any Future Framework.

Initially the focus should be on the retention of the direct jobs at Moneypoint which would require retraining, upskilling, or new qualifications to perhaps third level standards. The new opportunities which are emerging on the Atlantic seaboard largely centred around decarbonising our energy supply system and harnessing the vast resource that exists in renewable energy will involve marinization of the existing workforce into a field they previously have had no experience or knowledge of. The opportunity exists to establish a maritime training facility in West Clare within proximity to Moneypoint to meet the demand which will arise, create additional in-direct jobs, and fulfils the requirement to marinize the workforce. The Shannon Estuary Economic Taskforce (a commitment in the Programme for Government) developed a list of key recommendations following extensive consultation with regional, national, and international stakeholders. Amongst its key objectives the report calls for the expedited delivery of Atlantic Offshore Wind, and highlights the importance of a thriving research, education and training ecosystem which can assist in driving this specific economic opportunity. Specific objective around the establishment of a Maritime Training Centre of Excellence in Kilrush by 2025 are outlined within the report as follows:

The Shannon Estuary Economic Taskforce, 2021		
• Establish a Maritime Training Centre of Excellence in Kilrush by 2025, with funding supported by government through existing funding routes.	CCC	Q4, 2024

Over the long term this maritime training facility can also service the offshore renewable energy sector as it ramps up. Funding should first be targeted at the needs and requirements of the existing work force to provide this training and to establish such a facility to accommodate their needs. Early consultation with the National Maritime College of Ireland and the Limerick Clare Educational Training Board would be critical here.

Subsequently the workforce may require upskilling or additional qualifications/education which may need to be facilitated through the relevant third level institutes. Liaison with the University of Limerick in the first instance will be paramount. *Building our Potential – Ireland's Offshore Wind Skills and Talent Needs* was published by Green Tech and Skillnet Ireland in January 2024. This study is a comprehensive analysis of the opportunities for Irish businesses to be part of delivering the target of 37 GW of offshore wind energy by 2050. The recommendations outlined in the report include that significant investment in training and skills development will be needed to maximize the economic benefit to Ireland from the development of offshore wind farms. Clare County Council would ask that specific policy is included with regards to education to ensure the development of training and upskilling is undertaken close to where the ORE sector is looking to establish off the county Clare coastline.

The report clearly highlights the shortage of health and safety expertise, particularly offshore health and safety. Ireland's health and safety training schemes are currently aimed at onshore activities due to the country's significant installed onshore wind capacity. Access to Basic Safety Training is critical.

A key recommendation from this report is:

Help ensure maritime training and skills are readily available in Ireland, through:

- o Working with the NMCI to help recruit seafarers and ensure the training provided is appropriate for offshore wind. NMCI currently provides training from the GWO, and other providers should do the same to ensure qualifications are applicable internationally.

A specific Community Benefit Fund should include for the funding of this skills deficit and the training needs surrounding the ORE sector which should be provided at a local level.

## Conclusion

Clare County Council would welcome the opportunity to engage further in the development of this emerging Strategy given the significant opportunities that exist off the County Clare coastline and in that regard Clare County Council looks forward to a follow up consultation and engagement over the coming months.

  
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Clare County Council