



Future Framework Consultation
Offshore Environment and Future Development
Department of the Environment, Climate and Communications
29-31 Adelaide Road
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19/02/2024

via: FutureFrameworkpublicconsultation@decc.gov.ie

RE: DRAFT OFFSHORE RENEWABLE ENERGY FUTURE FRAMEWORK POLICY STATEMENT 2024

A Chara,

I refer to the public consultation in respect of the Government's Draft Offshore Renewable Energy Future Framework Policy Statement 2024 (herein referred to as the "draft Policy Statement"), and I herewith make a submission to it on behalf of the Northern and Western Regional Assembly.

This submission sets out the position from the Northern and Western Regional Assembly's perspective concluding with recommended Regional Asks of the Department to consider in the final Offshore Renewable Energy Development Future Framework Policy Statement. The Northern and Western Regional Assembly would also ask that transboundary consultation is undertaken, in particular with Northern Ireland, in advance of the Statement being finalized.

1: THE NORTHERN & WESTERN REGION IN CONTEXT AND THE REGIONAL SPATIAL AND ECONOMIC STRATEGY 2020-2032

The development of the offshore renewable energy sector will be essential to supporting the delivery of balanced regional development in line with the vision and objectives of the National Planning Framework (NPF)^[1] and the Regional Spatial and Economic Strategy (RSES) of the Northern and Western Region^[2]. Utilising these economic opportunities could not be more important for the Northern and Western Region considering the underperformance of the region's economy in recent years, with this challenge directly leading to rising regional inequalities in Ireland.

The scale of this challenge is evident across a host of socio-economic indicators, particularly in terms of disposable income per head of population^[3] and the regional distribution of

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population growth^[4]. According to the latest finalised figures from the CSO^[5], the difference between the Northern and Western Region and the Eastern and Midland Region – as a percentage of the State average – amounted to 18 percentage points in 2021, with the CSO’s latest preliminary estimates suggesting the gap is around 13 percentage points as of 2022^[6]. This is much wider compared to the corresponding gaps in the mid to late 2000s, when the relative performance of the two regions ranged from 9 to 10 percentage points. Likewise, the Eastern and Midland Region accounted for 55 per cent of all population growth in Ireland between Census 2016 and 2022, with the Northern and Western and the Southern Regions collectively accounting for 45 per cent of growth during this period. Given that the NPF acknowledges that the Greater Dublin Area has witnessed an overconcentration of population and employment, it is clear that the distribution of this growth is contrary to its stated objectives, specifically National Policy Objective (NPO) 1a which aims to ensure that the “projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined”^[7].

Considering the infrastructure and natural assets of the Northern and Western Region of Ireland, the region is strongly positioned to capitalise on any opportunities associated with the development of the offshore renewable energy sector. The scale of this potential was evident in the Assembly’s recent submission on the National Ports Policy^[8], with this document highlighting how the region possesses an array of ports that have the potential to either act as staging ports during the construction of offshore wind energy projects or to serve as operational and maintenance bases. Amongst other ports, the Port of Galway, Killybegs Harbour and Ros an Mhíl were considered to have the greatest capabilities in supporting offshore wind energy projects. These ports are regional assets, and their role, including additional diversification should be incorporated into any Offshore Renewable Strategy in order to effect geographical balance, and ease of access for expansion of renewable energy into the North Atlantic Ocean.

Furthermore, the region has an abundance of natural assets that are likely to aide any future investments in the region’s emerging offshore renewable energy sector, thereby supporting the ambitious targets outlined in the proposed framework. These would include – but would not be limited to – the fact that some of the fastest average wind speeds in Europe are found along the coast of the Northern and Western Region of Ireland, while the region also has appropriate water depths for both fixed and floating wind turbine projects, as evident from the latest draft of the Offshore Renewable Energy Development Plan^[9].

Considering this potential, the Northern and Western Regional Assembly included several “Regional Policy Objectives” in the RSES (see below) to highlight the sector’s importance in supporting future economic opportunities in the region. The RSES provides a high-level development framework for the Northern and Western Region that supports the implementation of the National Planning Framework. The vision of the RSES is “to play a leading role in the transformation of this region into a vibrant, connected, natural, inclusive

and smart place to work and live.” This is supported by five Growth Ambitions which in the context of this submission, explicitly refers to sustainability, energy supply and the ability to use renewable energy.

Across the Region there is evidence of thriving sectors and emerging sectors and clusters across many areas, including marine and blue economy, renewable energy and low carbon future.

At the interface of the Atlantic Ocean, seven of the nine local authority areas in the Region are located within six coastal counties. Development and test site infrastructure for offshore wave and wind power technologies are located in the Region - the Galway Bay Test Site and the Atlantic Marine Energy Test Site (AMETS) - part of an International Regime of Tests Sites (including Hawaii, Ireland and Scotland). The AMETS site will consist of onshore and offshore components. These sites illustrate the unique strategic position the Northern and Western Region has in relation to offshore renewable energy. Action Items 1-4 on p16 of the draft Policy Statement, while not explicit, refers to test sites.

In pursuing a path towards a low carbon future and access to affordable and reliable energy, offshore renewable energy and supporting infrastructural investment forms part of this journey. The RSES contains several Regional Policy Objectives (RPOs) supporting this, including RPO 4.17, RPO 4.18, RPO 4.19, RPO 4.22, RPO 4.33, RPO4.37, RPO 8.1, RPO 8.3, RPO 8.4 as set out in Appendix 2.

Aligned with the pursuit of a low carbon future and renewable energy is sustainable development and the protection of our environment. The Region contains numerous coastal SAC, SPA and NHA/pNHA sites. In this context RPO 5.5 and RPO 5.6 are also of significant relevance as set out in Appendix 2. Page 17 of the draft Policy Statement addresses environmental concerns.

To realise and support an emerging sector, research and development; education and training; and advanced technology play important roles. Page 18-19 of the draft Policy Statement touches on these matters. The RSES supports the development of these areas through the recognition and support of developing our third level education providers and the concept of a Smart Region. The RSES contains several Regional Policy Objectives (RPOs) supporting this, including RPO 6.42, RPO 6.43, RPO 6.44, RPO 6.45, RPO 7.1, RPO 7.4 and RPO 7.5 as set out in Appendix 2.

The recent designation of the Atlantic Technological University across the Northern & Western Region has the potential to foster added sectoral expertise around Marine Engineering and Marine Technology. The ongoing supply of skilled graduates in this area is an opportunity for the Region, and specialisms in the field should form part of a holistic all of Government approach to the State meeting its Climate goals as set out in the revised Climate Action Plan 2023. The Offshore Renewable Strategy should provide focus in this regard.

It is evident that the RSES for the Northern and Western Region supports the development of offshore renewable energy in a sustainable manner, which will add employment and investment opportunities to communities across the country, alongside securing a low carbon and sustainable future. Accordingly, it would be appropriate for the Department of Environment, Climate and Communications to develop the 'Future Framework' for offshore wind energy in a manner that supports the RSES.

2: THE NWRA POSITION PAPER ON MARINE SPATIAL PLANNING FRAMEWORK & PREPARATION OF DMAPs.

The NWRA would highlight the publication by the NWRA of a *Position Paper on Marine Spatial Planning Framework and the preparation of Designated Maritime Area Plans (DMAPs)* by Dr Cormac Walsh which was presented to Members of the Northern and Western Regional Assembly at its June monthly meeting 2023. This position paper was endorsed by the Elected Members of the Assembly.

The main aspects of the Position Paper are summarised below:

- Marine Spatial Planning Framework is a public-sector-led process of analysing and allocating the spatial and temporal distribution of human activities in marine areas to achieve ecological, economic, and social objectives. EU member states were required to prepare marine spatial plans by March 2021. In Ireland, the National Marine Planning Framework – 2021, (NMPF) fulfils this purpose.
- Designated Maritime Area Plans (DMAPs) are necessary to ensure coordinated and strategic marine and coastal planning at regional and local (sub-national) levels.
- DMAPs which apply exclusively to the nearshore area may be prepared by and adopted by a single coastal local authority or by a number of local authorities working together. Additionally, there is potential role for the Northern and Western Regional Assembly to become a designated competent authority for the preparation of DMAPs.
- Based on international experience it is possible to identify distinct models for the regional-scale governance of marine spatial planning. Regional governance options may include a Lead Authority Single-Plan approach, a Nested-Multilevel Governance, the preparation of a Strategic Regional Framework and DMAPs for Hotspots.
- The increasing importance accorded to the blue economy and the emergence of marine spatial planning as a regulatory framework create opportunities for sustainable economic development and innovation.
- The marine economy of the Northern and Western Region is diverse and builds on both long-established traditional industries and key strengths in emerging sectors.
- Two strategic pathways for the sustainable economic development of the marine economy in the Northern and Western Region are outlined:
 - 1) knowledge-intensive product development, testing and innovation; and

2) place-based sustainable tourism and flagship protected areas. Both build on existing assets and anticipated future opportunities.

- DMAPs can help in providing a coordinated, strategic approach to the development of the coastal and marine economy of the NWR. This task will require extensive stakeholder coordination, cross-sectoral and cross-boundary working and an assessment of the cumulative impact of any proposals on the marine environment.
- Coastal planning authorities will be responsible for the deciding on applications for planning permission within their nearshore areas, irrespective of whether DMAPs are prepared or not.
- MSP at the local and regional levels will require dedicated staffing and commitment of resources to allow for the recruitment of the necessary expertise to meet this complex challenge.

The position paper identifies regional governance options for the rollout of DMAPs and outlines a series of recommendations on practical steps to be taken to progress MSP in the Northern and Western Region. This is the first study to address the regional dimension of marine spatial planning in Ireland. It is the position of the Assembly the Regional structures in place across terrestrial planning (3 Regions) should be replicated for the purposes of DMAP planning, which would allow for an effective alignment at sea and on land.

Section 7 of the Paper issues recommendations in relation to the MSP and DMAPs and is of relevance to the ORE Future Framework at this juncture.

The role of the Regions, Local Authorities and the community level engagement should be an essential part of the Future Framework.

Section 7.0 Recommendations is of relevance to this discussion and **Paragraph 7.2** is of particular relevance, where it states *the NWRA should encourage and where appropriate facilitate the formation of marine / coastal partnerships as informal fora for structured stakeholder engagement. Such partnerships may be established at regional or local level or in response to particular issues in most cases it is likely that of local focus will be most effective.*

3: REGIONAL ASKS

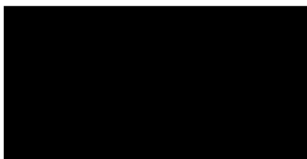
The Northern & Western Regional Assembly would request the following be factored into the Offshore Renewable Energy Future Policy Framework Statement:

- (i) Adopt a Regional approach for the Offshore Renewable Energy Future Framework Policy Statement, ensuring the economic opportunities associated with the development of the offshore renewable energy sector are spread evenly across the NUTS 2 Regions of Ireland and support the delivery of the National Planning Framework and the Regional Spatial and Economic Strategy of the Northern and Western Region.

- (ii) That the future Offshore Renewable Energy Framework places a clear emphasis on the utilisation, and developmental diversification in the Marine Sector for the ports of the Northern and Western Region of Ireland in supporting the development of the offshore renewables, with a particular focus on the Port of Galway, Killybegs Harbour and Ros an Mhíl.
- (iii) That the Document reflects the status as Regional assets of Education and Training bodies – in particular the Atlantic Technological University, the University of Galway and the Education and Training Boards (ETBs) of the Northern and Western Region – in providing the requisite training and skills programmes relevant for the offshore renewable energy sector.
- (iv) Provide adequate resources to research centres across the Northern and Western Region of Ireland, with the view of supporting efficiencies, innovation and technologies relevant to the offshore renewable energy sector.
- (v) That the Policy on Offshore Renewables clearly identifies any potential issues of capacity in the Electrical Grid infrastructure of the Northern and Western Region of Ireland, advocating a collaborative approach towards ensuring the region is capable of facilitating a scaling up in Offshore Renewable Energy projects off the West & North West Coastline.
- (vi) Commission a feasibility study examining the potential economic and social benefits associated with developing floating and fixed wind turbines off the coast of the Northern and Western Region of Ireland.

Finally, I hope that the above is of assistance in finalising the Statement and do not hesitate to revert should there be any queries concerning this submission.

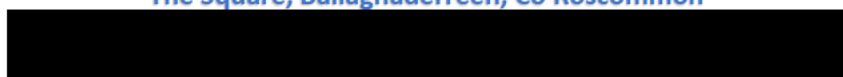
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Endnotes

^[1] <https://www.npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

^[2] <https://www.nwra.ie/pdfs/NWRA-RSES-2020-2032.pdf>



^[3] <https://www.cso.ie/en/releasesandpublications/ep/p-cirgdp/countyincomesandregionalgdp2020/data/>

^[4] <https://www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/populationchanges/>

^[5] **Table 5.1a:** <https://www.cso.ie/en/releasesandpublications/ep/p-cirgdp/countyincomesandregionalgdp2021/data/>

^[6] CSO have noted the 2022 figures will be subject to review

^[7] <https://www.npf.ie/wp-content/uploads/Project-Ireland-2040-NPF.pdf>

^[8] <https://www.nwra.ie/news/nwra-makes-submission-on-national-ports-policy/>

^[9] <https://www.gov.ie/pdf/?file=https://assets.gov.ie/248270/7338cf63-e174-4932-8c61-6b840e447f3d.pdf#page=null>

APPENDIX 1

REPORTS COMMISSIONED BY DECC

WS1 – Market Analysis: create relevant power market scenarios with varying ORE capacity and interconnection targets for elaboration in subsequent workstreams

WS2 – Interconnection: assess the technical and financial viability of electricity export via interconnection predominantly to France, the UK, and other northern European countries

WS3 – Renewable hydrogen: analyse the potential hydrogen future in Ireland including maximising cost-competitiveness

WS4 – Export viability: evaluate the export viability and implications in terms of Gross Value Added and employment benefits as well as policy, trade, and investment considerations

WS5 – Societal return: provide commentary on the financial and economic return to the State and local communities including recommended regulatory mechanisms.

APPENDIX 2 – RELEVANT REGIONAL POLICY OBJECTIVES FROM THE NORTHERN AND WESTERN REGIONAL SPATIAL AND ECONOMIC DEVELOPMENT STRATEGY

TABLE 1 - RELEVANT REGIONAL POLICY OBJECTIVES (RPO) WITHIN THE NORTHERN AND WESTERN REGIONAL SPATIAL AND ECONOMIC STRATEGY 2020-2032

RPO NO.	RPO TEXT
RPO 4.17	To position the region to avail of the emerging global market in renewable energy by: <ul style="list-style-type: none"> • Stimulating the development and deployment of the most advantageous renewable energy systems. • Supporting research and innovation. • Encouraging skills development and transferability. • Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy business. • Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.
RPO 4.18	Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.
RPO 4.19	Support the appropriate development of offshore wind energy production through the adequate provision of land-based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.
RPO 4.22	Safeguard and support the strategic role and function of existing test and development sites, for example, the Atlantic Marine Energy Test Site (AMETS). The test site forms part of Ireland's Ocean Energy Strategy and is being developed following the Offshore Renewable Energy Development Plan.
RPO 4.33	To facilitate where possible Marine Renewable Technology Projects off the West and North West coasts of Ireland, and subject to environmental and amenity considerations (feasibility studies), and where applicable, enable National Grid connection
RPO 4.37	To examine the potential of the region's other main ports to expand, and enhance facilities to enable them to become ports with enhanced regional significance in a range of areas, including trade, fisheries, marine tourism and renewables. This will be done in conjunction with all relevant stakeholders, including the relevant Local Authorities, and within the context of the NMPE.
RPO 5.5	Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage area. Conserve and protect European sites and their integrity.
RPO 5.6	Ensure that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.
RPO 6.42	Encourage policies that promote effective resource management through the application of new technologies, data and environmental management.
RPO 6.43	Encourage, pilot and collaborate with stakeholders to adopt technologies that improve energy and resource sustainability across the region.
RPO 6.44	Encourage the adoption of digital technologies and service platforms across the region to improve asset management and service delivery.
RPO 6.45	Leverage the Smart region approach to secure EU and private financing to accelerate business growth and economic development.

RPO 7.1	Support the co-ordination of employment skills and support in the region through the alignment of needs as identified by the Regional Skills Fora to include facilities and opportunities for disadvantaged areas and groups in the community.
RPO 7.4	Support the implementation of the STEM program in Irish Education out to 2026.
RPO 7.5	Ensure that the requirements of emerging sectors are reflected in the regional skills needs and resourcing.
RPO 8.1	The Assembly support the development of a safe, secure and reliable electricity network and the transition towards a low carbon economy centred on energy efficiency and the growth projects outlined and described in this strategy.
RPO 8.3	The Assembly support the necessary integration of the transmission network requirements to allow linkages with renewable energy proposals at all levels to the electricity transmission grid in a sustainable and timely manner.
RPO 8.4	That reinforcements and new electricity transmission infrastructure are put in place and their provision is supported, to ensure the energy needs of future population and economic expansion within designated growth areas and across the region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs. Ensure that development minimises impacts on designated areas.