



By Email: southcoastdmap@decc.gov.ie

Re: Draft South Coast Designated Maritime Area Plan (DMAP) for Offshore Renewable Energy (May 2024)

Dear Sir/Madam,

Waterford City and County Council welcomes the opportunity to engage with the process of preparing the Draft South Coast Designated Maritime Area Plan (DMAP) for Offshore Renewable Energy (May 2024) and would comment that the information included in the draft has been very useful and informative. The documentation provides a strong base on which to develop the plan led approach to ORE development which will ultimately lead to the country attaining its renewable energy targets through private sector investment and the associated progress towards meeting our international obligations to reduce carbon emission globally and the associated climate impacts. The time afforded to engagement with the local authority on the Draft DMAP has been useful and further such engagement opportunities will be welcomed. The following comments should be given due consideration in preparation of the final DMAP.

The administrative area of Waterford City and County Council stretches for a distance of c. 100km, making up the central element of the northern boundary of the maritime area. Local coastal communities have evolved over time with associated marine dependencies, historically focussing on fishing but more recently on tourism and associate service industry.

The Waterford City & County Development Plan 2022 – 2028 recognises the importance of certain rural coastal clusters such as those at/along Waterford Estuary, Copper Coast UNESCO Geopark, and Gaeltacht na nDéise for their diversity, and capacity to create unique, multi-purpose employment opportunities which will secure long-term sustainable social, economic, and environmental development within their respective communities. Most specifically, renewable energy and ORE are supported through the main policy objective UTL13 wherein Waterford City and County Council will promote and facilitate a culture of adopting energy efficiency/ renewable energy technologies and energy conservation and seek to reduce dependency on fossil fuels thereby enhancing the environmental, social, and economic benefits to Waterford City and County. In terms of offshore this will be achieved by:



- Facilitating and encouraging, where appropriate, proposals for renewable energy generation, transmission and distribution and ancillary support infrastructure facilities including the necessary infrastructure required for the development of offshore renewable energy developments developed fully in accordance with the Waterford Renewable Energy Strategy, the wind energy designation map (Appendix 2 of the RES), the Waterford Landscape and Seascape Character Assessment undertaken to inform this Development Plan, and the National Wind Energy Guidelines, or any subsequent update/ review of these.
- The Council recognizes and supports the role that the County can play in facilitating the onshore infrastructure required for the construction, operation, and maintenance of offshore wind farm developments. This infrastructure includes but is not limited to construction facilities, storage and lay-down areas, cable landfalls, onshore cable routing to substations, port and harbour infrastructure and coastal operations and maintenance bases, as well as use, reuse or repowering of existing infrastructure where appropriate.
- Promote and encourage the use of renewable energy, and low carbon resources, namely solar photovoltaic, geothermal, heat pumps, district heating, solar thermal, hydro, tidal power, offshore and onshore wind, biomass as well as micro-generation among business, agriculture, education, health, and other sectors.
- To support in conjunction with other relevant agencies, wind energy initiatives, both onshore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner.

The potential for offshore wind is also recognized in CCDP Appendix 7 – Renewable Energy Strategy (Sections 8.1 & 8.2). It is noted here that Fixed turbines (i.e. turbines constructed on the seabed) are typically suited to a seabed depth of up to 50m which would cover a distance of 8km approximately from the coastline. Floating turbines are most suited thereafter, whilst also recognizing that offshore



wind presents challenges in terms of construction costs, grid connection, development planning and visual/environmental impacts, requiring the input of a wide range of stakeholders.

Waterford City and County Council welcomes the commitment as evidenced throughout draft DMAP preparation process to date, and as stated throughout the document, to fully engage with the local communities most impact by potential development. Waterford City and County Council would particularly note the coastal communities (including Gaeltacht na nDéise) in close proximity to Area A - Tonn Nua. In this regard it is considered that the text of policy objective **CE 1** should be enhanced to ensure there is greater clarity provided by holders of MAC / prospective developers on how the Community Benefit Fund will be provided, administered, governed, and delivered as an essential part of the requirement for a Public Engagement Plan for the local communities most effected by a prospective development. It is critically important that the community benefit fund assists in community building and not division so clarity around the types of projects supported, and governance of the fund will be important issues to be considered in the early stages of any ORE project. Therefore, the issues of **fund provision, fund administration, governance and project identification** should be clearly stated as a requirement of the Public Engagement Plan under **CE 1** while there will be a requirement for a **strategic framework** to deliver of the fund over its lifetime. It is suggested that local authorities, at both political and executive levels, would be key stakeholders in preparing and implementing such strategic frameworks. Finally, taking cognisance of the ongoing demise of fishing and the associated reduced capacity for income generation locally, and that ORE development will have a positive impact on reducing our national carbon emissions, it is considered that a proportion of any Just Transition Fund could supplement and augment the Community Benefit Fund so as to assist local communities.

Policy objective **EC 1** in section 9 of the draft is welcomed by Waterford City and County Council. However, in support of local communities most effected, **EC 1** should include reference to embedding research, innovation, skills development, enterprise, jobs growth etc within those local and proximate communities to each DMAP area as a preference, while recognising the importance of agglomeration and scale. This could be supported by environmental monitoring and further marine specialisation locally through the third level education sector. SETU is ideally placed to support such specialisation given its regional dimension.



Finally, the policy objectives **LS 1** and **LS 2** are vitally important to ensuring an integrated and coordinated approach to ORE delivery to the grid network. It is considered that the stated commitment in the second sentence of **LS 1** to statutory environmental assessment should also be reiterated/repeated in **LS 2**.

Signed



Senior Executive Planner

13th June 2024