

Department of Environment, Climate and Communications 29-31 Adelaide Road, Dublin 2, D02 X285 Fitzgerald House, Summerhill North, Cork, T23 TD90, Ireland, +353 (0)21 450 9044 info@corkchamber.ie CorkChamber.ie

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RE: Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy

To whom it concerns,

Cork Chamber represents 1,200 members together employing 120,000 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 five of which have been identified by the Chambers Ireland network.

On behalf of our members, we welcome the opportunity to contribute to this strategically important consultation that will shape Ireland's renewable energy future. In particular we commend the department for positioning the first Designated Maritime Area Plan off the South Coast (SC-DMAP) where the existing infrastructure in Cork Harbour makes it the ideal location for offshore renewable energy (ORE) development to take place.

Government has made good progress over the last number of months, with significant policy progress and milestones being made for the ORE sector. The publication of key documents by the Department of Environment, Climate and Communications (DECC) including the final Terms and Conditions for the Fourth Competition under the Renewable Electricity Support Scheme (the RESS 4 Terms & Conditions); the draft Terms and Conditions on the Offshore Renewable Electricity Support Scheme 2.1 auction; the Future Framework for Offshore Renewable Energy; and the subject of this submission, the draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy (the Draft SC-DMAP), have been most welcome. It is important now that this momentum that has built up over the last number of months continues.

There has been good and meaningful engagement from Government throughout the SC-DMAP consultation process and we urge that this level of collaboration between all stakeholders continues on an on-going basis. By tapping into available technical expertise, we can better grasp the necessary steps to achieve our climate and renewable energy goals.

We ask that you consider our observations and comments on the SC-DMAP consultation, which has been formed by our members.

Yours sincerely,





Introduction

The development of this SC-DMAP and the wider ORE industry is of strategic national importance. The benefits will be shared across broader society in terms of delivering an affordable supply of energy to consumers. There is also incredible potential for economic growth and employment opportunities which will enhance Ireland's attractiveness to FDI.

Providing certainty across all aspects of ORE development is essential to the success of developing the industry at the pace needed to meet our legally binding climate and energy targets. Certainty and a well-constructed plan can only be achieved through meaningful stakeholder engagement.

It is vital that once this draft plan goes through the public consultation process, that it is presented before the Oireachtas Committee in a timely manner. Any further delays to the development of the sector will significantly impede Ireland's ability to achieve its legally binding obligations. We urge than any delays to its approval are avoided.

The following paragraphs will outline the key priorities for our members active in the ORE sector and stakeholders in relation to the draft SC DMAP for ORE.

Identifying Maritime Areas for Offshore Wind Development

1. Do you agree with the four maritime areas identified for future offshore wind development in the draft SC-DMAP? If not, why?

With respect to Maritime Area A, Tonn Nua, we agree that it is appropriately positioned as the first site for auction.

However, further clarity on the sequence of subsequent ORESS auctions and MACs beyond Tonn NUA for Maritime areas B, C, and D is needed. Certainty over timescales and sequencing of deployment is essential to cementing investor confidence. Currently the Draft DMAP indicates they may be either grid connected or off-grid. Given that the onshore infrastructure to support both options requires a decade to plan and deliver we believe that there is a requirement to progress the route to market in tandem with the DMAP and this should be accommodated in relevant regional plans. Clarity on the programme, timescale, and non-grid guidelines should be a crucial part of the SC-DMAP process.

Under Maritime Areas B, C, and D, which have higher water depths, the deployment of floating wind technology should be seriously considered. Contrary to some perceptions, floating wind technology is capable of handling high waves and has been successfully deployed in other regions. For instance, the WindFloat Atlantic project¹ demonstrates the viability of this technology in challenging marine environments. Public awareness of such advancements should be increased to build confidence in the feasibility and reliability of floating wind solutions.

Wake effect

One aspect which does not appear to have been included in the selection criteria is the assessment of 'wake effects' between sites. We recommend that this is considered in advance of any auction process so that losses from site to site will be understood and compensated for in the auction mechanism.

¹ WindFloat Atlantic

Clarity on grid availability and development

It is essential that the SC-DMAP and future DMAPs clearly support grid infrastructure and that any ambiguity in this regard is clarified. The development of an offshore grid and substations, particularly by EirGrid, must be accelerated. Without a robust and modernised grid, the energy generated by ORE projects cannot be effectively transmitted and utilised, undermining the entire initiative.

Port of Cork Funding

Port facilities are referenced in the draft plan as integral to facilitating the installation and servicing of ORE development. Cork has the potential to be a major renewable energy hub, contributing to national targets and Ireland's energy security, attracting Foreign Direct Investment, and eventually becoming a net exporter to Europe. Home to the only Irish port with planning permission to build the essential structures to support the development of the sector by 2030, it is evident that Cork will be the first region to support the ORE sector. However, to deliver on this potential, immediate funding for the Port of Cork is needed before the current planning permission expires in 2025.

Decisive action is needed now to unlock Ireland's full wind energy potential, creating jobs and establishing itself as a leader in the clean energy transition. We are in direct competition with other countries for investment, equipment, talent, and suppliers, and it is a contest we cannot win without immediate Government investment. Without this funding, the efforts being made across all Government departments, developers, and stakeholders will prove futile. This funding must be a top priority and considered a strategic national priority.

Sustainable Development and Environmental Protection

2. Do you agree that the draft SC-DMAP policy objectives and governance approach, including for environmental protection, will support and guide its sustainable and coherent implementation?

As the SC-DMAP is likely to be the template for future DMAPs, it is essential that it is progressed with that in mind. The SC DMAP development should be contextualised within the overall DMAP rollout. Timelines for and the progression of the DMAP programme with a clear route to market, including grid connections and regulatory frameworks, should be produced as part of a roadmap for delivery.

The validity time of 6 years is not long enough and should be extended to 10 years as this aligns with national decarbonisation policy, planning and development legislation, and will better enable ORE project development. This is essential for developers and supply chain operators based in Cork.

Promoting Shared Use of the Sea

3. Do you agree that the draft SC-DMAP includes sufficient provisions for co-existence between offshore renewable energy and other maritime activities?

We actively support the need for co-existence, but this should be expanded to include not just traditional industries (fishing), but also designation for Marine Protected Areas (MPA), shipping, and other maritime activities.

The work of the Seafood-ORE Working Group (WG) needs to be recognised with respect to dispute resolution and compensation for displacement to deliver co-existence between these industries. We recommend that the outputs from this WG are incorporated into future management of DMAP areas, especially during surveying and construction phases. This is essential for ORE to work synergistically with important maritime sectors across the Cork Region.

Maximizing Benefits for All

4. Do you agree that the plan-led framework set out in the draft SC-DMAP will effectively support and drive economic and employment opportunities, including opportunities along the south coast?

The Draft SC-DMAP outlines a strategic framework poised to significantly enhance economic and employment prospects along the South Coast. It is projected to attract billions of euros in investment into Ireland, creating thousands of long-term, sustainable jobs, especially within coastal communities. According to the BVG Associates Regional Economic Impact study² accompanying the Draft SC-DMAP, Ireland will benefit from €4.4 billion in gross value added (GVA) and 49,000 full-time years of employment. The South Coast region will capture between 66% and 70% of these benefits, with projections of up to €3.1 billion GVA and 34,300 FTE years respectively.

In addition, the SC-DMAP could facilitate the development of ORE projects capable of providing up to 5.6GW of energy, equivalent to Ireland's current national peak electricity demand. Delivering offshore wind energy at this scale will drastically reduce CO2 emissions, ensure energy security, and support the decarbonisation of the sector. Furthermore, it positions Ireland to become a key exporter of clean renewable energy to the EU market.

The BVG Associates report confirms that aligning the SC-DMAP with supply chain development across the Cork Region will yield significant economic benefits. Cork, through UCC, MTU, and the NMCI, along with centres of excellence such as the SFI MaREI Centre, plays a crucial role in upskilling the current workforce and training the next generation of ORE professionals.

Overall, this DMAP will deliver the clean, affordable, and secure energy that Irish families, communities, and businesses need.

Community Engagement and Benefit Sharing

Community support is critical for the success of ORE projects. As seen in countries like Scotland³ and Denmark⁴, legislating for communities to be shareholders in ORE projects can drive local support and ensure that the benefits of renewable energy are widely shared.

Positive experiences from other jurisdictions show that local communities welcome economic benefits and contributions to decarbonising energy supply. Projects offer direct benefits through Community Benefit Funds (CBF), mandated for government-supported projects under ORESS, providing significant annual funding to local areas. The SC-DMAP should establish CBFs for South Coast projects, even if the requirement transitions from ORESS to Maritime Area Consents (MAC).

² Regional economic impact of offshore wind development

³ Community Ownership in Scotland

⁴ Community Ownership in Denmark

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Clear guidance from DECC on this transition is needed to manage community expectations effectively.

Implementing similar mechanisms in the SC-DMAP could help ensure that communities and taxpayers hold a stake in ORE projects, benefiting directly from the generated energy. This approach would not only foster local support but also align with the goals of energy security, decarbonisation, and economic development.

Additionally, there should be provisions to ensure that surplus energy, which might otherwise be wasted, is redirected to alleviate fuel poverty within the catchment areas.

Conclusion

In conclusion, the draft SC-DMAP is a crucial step towards realising Ireland's renewable energy potential. However, to ensure its success, it is vital that the plan addresses the outlined concerns and recommendations. Clarity, stability, and proactive investment are necessary to transform Cork into a renewable energy hub, driving economic growth and establishing Ireland as a leader in the global clean energy transition.

We look forward to the continued development and refinement of the SC-DMAP and are committed to supporting its successful implementation.