



Tionól Réigiúnach
an Deiscirt

Southern Regional
Assembly

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South Coast DMAP,
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6th October 2023

**Re: Submission to the South Coast Renewable Energy DMAP Proposal Consultation
SRA File Ref: G23/004**

A Chara,

The Southern Regional Assembly (SRA) welcome the opportunity to engage with the Consultation process for the South Coast Renewable Energy Designated Maritime Area Plan (DMAP) Proposal.

The SRA's submission is based on the regional priorities as set out in the Regional Spatial and Economic Strategy (RSES) which came into effect 31st January 2020. The RSES sets a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development and aims for the Southern Region to become one of Europe's most "**Creative and Innovative**", "**Liveable**" and "**Greenest**" Regions.

The SRA supports the development of up to 900 MW offshore wind capacity through the DMAP process and the contribution of Offshore Renewable Energy (ORE) to achieving the Government objective of 5 GW of grid connected offshore wind by 2030 and its legally binding path to net-zero emissions no later than 2050, as required by the Climate Action and Low Carbon Development Act (as amended).

We welcome the DMAP Proposal process which is utilising an ecosystem-based approach and seeks to provide comprehensive opportunities for public and stakeholder engagement and has included a focus on local coastal and marine communities.

This submission sets out four recommendations under the following:

- 1) The DMAP should support delivery of green and balanced regional development
- 2) Future ORE should support regional economic development
- 3) Investment in the Region's ports to enable ORE
- 4) RSES implementation initiatives supporting ORE



1.0 The DMAP should support delivery of green and balanced regional development

The delivery of balanced regional development is a core principle of planning policy at all levels. The NPF, RSES and Local Authority City and County Development Plans are aligned in the distribution of growth targets for the Regions and at county and settlement level.

The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities and metropolitan areas (Cork, Limerick-Shannon, and Waterford) to grow by 50%-60% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions. The Southern Region's population is targeted to grow by up to an additional 343,500 persons by 2031 and an additional 225,000 in employment.

Development of the energy grid and integration of renewable sources of electricity production is an essential infrastructure to service targeted growth. Renewable energy produced from ORE sources could supply, the power demand generated from existing and future population and economic growth in the Region in close proximity to our Cities and Metropolitan Areas (Cork, Limerick-Shannon and Waterford), Key Towns and our network of settlements and rural communities which are co-located or in close proximity with ports, harbours and ORE resources off our coasts.

Recommendation 1: The DMAP Proposal should accord with national, regional, and local policy for balanced regional development. ORE has the potential to supply existing and targeted population and employment growth along our south coast, especially centres of scale including our Cities and Metropolitan Areas, and Key Towns which are either co-located or closely accessible to ports and harbours and the coast. Demand centre proximity should be a criterion for the proposed location of ORE to service population and economic growth targets.

2.0 Future ORE should support regional economic development.

The SRA welcome the principles that underpin the DMAP Proposal to ensure the economic, environmental, and societal benefits of ORE are realised for everyone. Developing ORE is a positive proposition for the Region's economic development and is a sector that the Southern Region can position itself to be leader, nationally and internationally.

Research undertaken by the Southern Regional Assembly in 2021 on a regional approach to Smart Specialisation¹ identified innovation in the development of marine renewable energy as one of the region's priority growth sectors and economic specialisms.

The RSES strongly supports the development of the marine economy, Regional Policy Objective 85 "Renewable Offshore Energy" seeks to realise the Regions ORE potential. Harnessing the potential of ORE through infrastructure development and grid connection is central to the Region's low carbon energy future. Developing the capacity of our port assets to service ORE is also supported by several objectives.²

¹ Interreg Europe Cohesion Project, Southern Regional Assembly and BABLE, 2021, Regional Approach for development of a Smart Specialisation Strategy in the Southern Region. Available at:

<http://www.southernassembly.ie/news/news-article/a-regional-approach-to-smart-specialisation>

² RPOs 95-104 Renewable Energy, 146-147 High Quality Connectivity and Economic Opportunities of Ports and RPOs 219-224 Strategic Energy Grid.



Port infrastructure and strategic landside assets of relevance to this consultation include:

- The Port of Cork, a Tier 1 International multi-purpose deep water port facility with strategic assets for the Marine Economy in the South-West including Ringaskiddy, Marino Point, Whitegate and Bantry.
- The South-East contains two ports of national significance in the Port of Waterford and Rosslare Europort (both Tier 2 ports) which have the potential to service offshore wind projects including Helvick Head, Waterford; Celtic Sea Array, Waterford and Kilmichael Point, Wexford. It is an objective of the RSES that these ports achieve Tier 1 status.
- The Eirgrid Celtic Interconnector between Cork and Finistère is due for completion in 2026 and will provide international energy transmission facilities to Europe.

In close proximity to the South Coast DMAP area, our Region also has significant marine resources, port assets and maritime industrial land assets to support the development of the ORE sector including:

- Shannon Foynes Port, a Tier 1 international multi-purpose deep water port facility with significant capacity and potential to lead and service ORE wind production.
- The wider Shannon Estuary, including strategic development lands for marine and renewable energy enterprise identified through the Shannon Integrated Framework Plan in Clare, Limerick, and Kerry.

The potential synergy between ORE development off the southern coast in this DMAP study area with future potential locations further off the South West coast, Mid-West Coast, and Shannon Estuary should be considered so a holistic approach is taken for developing the sector in the Southern Region. This will support economic development opportunities through the marine economy and renewable energy sectors for all our coastal Counties and Local Authorities.

The development of ORE and the DMAP process can support the centres of marine research and innovation, including, the Mobile and Marine Robotics Research Centre hosted at the University of Limerick, the Centre for Marine and Renewable Energy (MaREI) in Cork, and The South-East Technological University (SETU) is home to an emerging marine innovation and sustainable marine research.

The DMAP process should apply a just transition approach. It is an objective of the RSES under RPO 83 to support investment which strengthens and sustainably grows coastal and island communities. It is also an objective to seek the implementation and investment in actions that support the Fishing Local Area Group (FLAG) Development Strategies under RPO 84. It is important that the DMAP process assesses the potential impacts, positive and negative, on coastal and island communities and employment. The land (City and County Development Plans/Local Area Plans) and sea (the DMAP) plans should coordinate to support the social and economic development of coastal communities.

Recommendation 2: The DMAP proposal should maximise the potential for economic growth and local jobs creation which will be generated by the development of ORE in the Southern Region. Regard should be given to the required level of infrastructure investment, project delivery (especially enhanced inter-regional connectivity across multi-modal transport, digital connectivity, and energy grid) and skills development. Opportunities to partner and collaborate with existing and emerging



centres of excellence should be part of the DMAP process and development of ORE. Appropriate supports and mitigation should be delivered by ORE project(s) , especially balancing the use of the marine environment for other important sectors including our fishing , seafood and marine tourism sectors and developing the economic potential for new jobs and inward investment (direct and indirect) for coastal communities arising from the growth of the ORE industry.

3.0 Investment in the Region's ports to enable ORE

The Department of Transport's policy position on the role of commercial ports to facilitate ORE³ recognised the existing ports in Ireland have a significant role in providing the required large-scale port infrastructure for ORE deployment.

The policy recommended a multiport approach to address the needs of the ORE industry and to position Ireland to take advantage of the economic opportunity created by the roll out of both fixed and floating offshore wind in Irish waters. ORE developments will typically require both large-scale port infrastructure for project deployment and smaller-scale port facilities to provide ongoing operation and maintenance services.

This position is advocated by the SRA who have consistently advocated in pursuit of RSES objectives⁴ for greater national policy priority for ports and harbours in the Southern Region. Our cities and metropolitan areas are each interconnected with economic activity of Tier 1 and Tier 2 Ports which play a strategic role in their economic development and growth.

Optimising the capacity of our port and harbour assets for economic competitiveness advances Regional Parity and provides a counterbalance to pressures on Dublin's infrastructure. Improved regional connectivity (multi modal road and rail freight networks) with guaranteed journey times for moving people and logistics to and from our Tier 1 and Tier 2 Port assets (Ports of Cork, Shannon-Foynes, Waterford-Belview and Rosslare Europort), between our regional ports, harbours, and fishery centres and on the EU TEN-T network is vital for our economic resilience. This strengthened connectivity between ports will service the ORE sector.

Through the next phase of the Southern DMAP process, consideration should be given to the location of onshore infrastructure, the capacity at ports, large scale industrial opportunities and green hydrogen potential as important criteria for selecting broad areas of interest to investigate further and develop ORE potential.

This is underlined by the recent publication on National Ports Policy by Wind Energy Ireland 2022⁵ which found there is currently no capacity in place to support floating technology but that subject to infrastructure improvements, this capacity can be secured by our ports. However, there is a gap between the urgency on securing ORE targets and the time needed for ports to develop their capacity

³ Department of Transport Policy Statement on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland (December 2021).

⁴RSES RPOs 140-147 including RPO 144 Port Infrastructure and RPO 147 Economic Opportunities of Ports were cited in SRA submissions to the National Development Plan Review and National Economic Recovery Plan.

⁵ National Ports Study, 2022, Wind Energy Ireland and Gavin & Doherty Geosolutions Available at:

<https://windenergyireland.com/images/files/final-national-ports-study.pdf>



to facilitate the sector. Without a significant and timely scaling up of infrastructure preparation, Ireland may lose out on the economic benefits from construction and servicing the ORE sector.

The opportunities for port development and facilitating ORE is recognised by the port companies. Each of the Tier 1 and Tier 2 Ports either have developed or are in the process of developing ambitious and visionary masterplans to future proof port capacity to service ORE potential.

A cross government commitment for investment in the Region's ports and harbour assets, to support inter regional and intra-regional multi-modal connectivity between ports and on the TEN-T core and comprehensive networks and support implementation port masterplan development is required.

Recommendation 3: The DMAP Proposal should place a strong emphasis on having on shore infrastructure in place, especially port and harbour infrastructure capacity, as a matter of urgency to develop service and maintain our ORE capability and supply chain economic activities.

3.1: There is a need to align government policy and funding to deliver enabling onshore infrastructure, especially port transport accessibility (multi modal), digital and electricity grid connectivity and on-site port infrastructure facilities to support the construction, servicing and on-going operation and maintenance of any ORE location(s). The review of National Ports Policy will be a key opportunity to strengthen support to Tier 1, Tier 2 and regional port and harbour assets in facilitating ORE alongside other key operational activities.

3.2: Further to the publication of the Department of Transport Policy Statement on the facilitation of Offshore Renewable Energy by Commercial Ports in Ireland (December 2021), strengthened support is needed to realise the vision of port masterplans and identify funding pathways on an on-going and longer term basis (such as Connecting Europe Funding facility (CEF) and other funding sources beyond it) to assist the implementation port infrastructure projects facilitating ORE and the transition of ports to a zero carbon future.

4.0 RSES implementation initiatives supporting ORE

The following two initiatives of the SRA have been identified as transformative actions under the Two-Year Review of the RSES⁶ and are summarised below to assist DMAP proposal implementation.

Regional Ports and Harbour Strategy

The SRA are advancing work on preparing a Ports and Harbour Strategy for the Southern Region. The strategy will aim to provide a set of researched, evidence-based recommendations to Government to inform the development of new national ports policy, communicate the economic role of our port assets on our Region's economy and support strengthened national policy prioritisation and funding towards port infrastructure. The individual and combined strength of our port assets (Tier 1, Tier 2, and Regional Ports) is a significant proposition for national and regional growth and the ORE sector which the strategy will seek to convey to assist our port stakeholders.

⁶ RSES Two Year Review Monitoring Report 2022. Available at: https://www.southernassembly.ie/uploads/general-files/RSES_Two_Year_Monitoring_Report_Web_Version.pdf



Regional Renewable Energy Strategy Roadmap and Strategy under the Climate Acton Plan.

The Climate Action Plan gives responsibility to the Regional Assemblies for the preparation of a roadmap for Regional Renewable Electricity Strategy. The SRA are developing this action in conjunction with the Department of Environment, Climate and Communications, SEAI and the other Assemblies. In addition, the SRA have secured support from ESPON (EU Programme conducting EU territorial analysis) to conduct a case study on decarbonisation in the Southern Region. This analysis will inform and support the development of a Regional Decarbonisation Plan. Harnessing the potential of ORE in the Region will be a strategic opportunity supported by the upcoming strategy.

The SRA encourage further engagement with the Department on the development of both these regional initiatives.

Recommendation 4: The SRA will welcome further engagement with the Department of the Environment, Climate and Communications on the preparation and recommendations of the Regional Ports and Harbour Strategy and Regional Renewable Energy Strategy, two initiatives under RSES implementation which will support the implementation of the DMAP Proposal.

Conclusion

The SRA welcome this opportunity to make this submission to the South Coast Renewable Energy DMAP Proposal. Developing the ORE sector is a significant opportunity for Regional economic development in addition to achieving our national target for a zero-carbon energy system by 2050 to meet our Climate Action commitments. These recommendations aim to reinforce and strengthen the Region's opportunities for balanced regional development, support the DMAP proposal process, and facilitate ORE development in the Region.

The SRA welcome follow up consultation to discuss this submission and look forward to further engagement on the 'Draft DMAP'.

Mise le meas,

A handwritten signature in blue ink, appearing to read 'David Kelly'.

David Kelly
Director, Southern Regional Assembly