Chambers Ireland response to the Marine Planning Policy Statement consultation

August 2019

Introduction

Chambers Ireland is the largest business network in the State. With members in every geographic region and economic sector in Ireland, we are well positioned to represent the views of businesses and understand their concerns. We welcome the opportunity to engage in the Department of Housing and Local Government's consultation on the recently published Marine Planning Policy Statement. (MPPS)

The development of a strategic scheme for managing, maintaining, and enhancing Ireland's marine territories is a welcome step. Ireland's extensive marine territories exceed our land mass area by an order of magnitude. This vast area offers us great economic opportunities, but these opportunities also come with a complementary duty to protect these regions so that they might benefit both future generations and the people with whom we share the shores of the Atlantic Ocean. These duties are heightened when we consider that the biodiversity crisis[1] that affects every part of our globe and which is particularly pronounced in the marine environment.

It is therefore essential that Ireland establishes a single overarching policy framework which clearly delineates departmental responsibility and jurisdiction over our marine environment. If we are to achieve a "Good Environmental Status" for our marine territories, protecting our aquatic and avian wildlife, then creating an effective policy environment, such as the MPPS, is essential.

Marine Planning Policy Statement

The ambitious vision of the MPPS, which seeks to integrate fisheries policies with habitat protection and the Sustainable Development Goals, in combination with the overhaul of the marine planning environment (through the creation of new legal constructs such as the 'near shore' and 'land-sea interactions'), into a single clear policy framework will transform how Ireland sees, and interacts with, our seas.

The MPPS will not only support Ireland to meet our EU regulatory responsibilities regarding the Marine Spatial Planning Directive, but also lays the groundwork for creating the legal and

[1] https://www.nature.com/articles/d41586-019-01448-4

regulatory framework that facilitates our State acting upon its environmental responsibilities regarding climate change and permits Ireland to fulfil its duties to the international community by reducing carbon dioxide emissions. The delayed implementation of a legal framework that supports the construction of offshore energy construction will lead to us overshooting our 2020 CO_2 emissions targets and will result in significant fines which are of great concern to our member chambers. Furthermore, without this framework, it may not be possible for us to meet our 2030 targets, which will come with additional fines and sanctions.

Decarbonising our electricity supply is an essential element of the All-of-Government Climate Action Plan. This plan foresees the creation of 'at least 3.5 GW of offshore renewable energy' as part of mix which is necessary for us to successfully transition our electricity supply which is at least 70% renewable by 2030. This makes the MPPS central to the Climate Action Plan and heightens the importance of offshore energy generation far beyond the ambitions of the 2014 Offshore Renewable Energy Development Plan[2].

The opportunity cost for the delayed development of offshore renewable energy has been enormous. Not only are we delaying the day when Ireland becomes energy independent, but past inaction has meant that Ireland will be obliged to not only pay significant fines for exceeding our CO_2 emissions targets, but the economy will also lose out on thousands[3] of construction related jobs in many of our most economically disadvantaged regions. Had we commenced and continued the development of onshore and offshore wind generated electricity, then SEAI models[4] argue that we would, by 2030, have achieved sufficient supplies of wind sourced electricity to exceed total domestic demand.

In the twenty year time frame from the commencement of a sustained offshore wind generation development programme, the SEAI[4] claim that over 10GW of electrical capacity, sourced from fixed offshore wind turbines, will be available to the Irish grid. In addition, there is likely to be another 20GW of electricity to be derived from floating wind turbines, and additionally, there would be in excess of another 10GW of onshore wind generated electricity. Combined this would put the wind generated electricity output of the Irish grid at more than 40 GW, over three times the current total potential output, and eight times EirGrid's 2022 projected demand[5]. Given the near-zero marginal cost of wind generated electricity and turbines which have lifespans of decades, this surplus electricity has the potential to be a hugely valuable national export.

[2] https://www.dccae.gov.ie/en-ie/energy/topics/Renewable-Energy/electricity/offshore/offshore-renewable-energy-development-plan-/Pages/Offshore-Renewable-Energy-Development-Plan.aspx
[3] https://www.seai.ie/resources/publications/Wind_Energy_Roadmap_2011-2050.pdf
[4] https://www.seai.ie/resources/publications/Wind_Energy_Roadmap_2011-2050.pdf
[5] http://www.eirgridgroup.com/site-files/library/EirGrid/Draft-Grid-Implementation-Plan-2017-2022_for-consultation.pdf

Potential delays in the legal and planning processes around the construction of offshore renewable energy sources risk not only postponing the day when we become a net exporter of electricity, but in the medium term, the energy security threats which we face will be amplified; undermining our economy in the process. With the downgrading of traditional thermal electricity generation plants, Ireland will see our range of energy supply sources narrow. This will make us ever more dependent on fossil fuels sourced from politically volatile regimes. Having significant offshore renewable energy generation as part of our energy mix is key to our electricity network becoming resilient and is fundamental to our being an attractive target for investment. The construction and servicing of offshore wind turbines will create decades of skilled work for those in coastal communities, and the ports development which will support these construction efforts has the potential to enliven depressed economies, while also allowing individuals from these areas to develop skills which will allow them to diversify from primary industries.

Within the overarching confines of protecting and tending to our marine environment, the Marine Planning Policy Statement, through the National Marine Development Plan, the Marine Planning and Development Management Bill, the Maritime Jurisdiction Bill, and the National Marine Planning Framework, must at every turn facilitate the speedy integration of offshore wind powered electricity generation into the national grid.

This aim is vital not only to our economic interest but also to our national interests, as the reduction of damage to the global environment it will be of direct benefit to the Irish people. Furthermore, it will demonstrate our commitment to the international obligations toward sustainable development which we have undertaken.

With the above in mind, we ask that the Department take into consideration the following recommendations which we believe will support the objectives set out in the MPPS.

Chambers Ireland Recommendations

- Of primary importance, is the speedy passage of the Marine Planning and Development Management Bill. We are at least seven years behind where we hoped we would be in terms of offshore energy development and we are also behind in our commitment to reduce greenhouse gas emissions, there isn't room for further delays.

- To avoid a hiatus in the construction and integration of offshore energy, a transition period should be incorporated into the MPPS structure relating to offshore energy that

allows projects which were developed under the previous planning regime to be grandfathered into the updated schemes.

- The existing EirGrid Grid Implementation Plan runs to 2022 and does not involve significant investment in creating infrastructure that allows for the landing of offshore produced electricity. Based on this plan, even if the projects which are being proposed were green lit, then there would be no capacity for EirGird to commence the construction of the infrastructure which will be necessary to support offshore derived energy until 2023. Furthermore, given the likelihood that the offshore regulatory framework will not be finalised until late 2020, and that the lead-in time for projects is likely to be considerable, it is possible that many proposed electricity generation fields will not be sufficiently advanced to allow for their inclusion into EirGrid's 2023-2028 round of infrastructure development. Therefore, it is essential that EirGrid is sufficiently resourced to be able to commence the construction of new infrastructure to integrate offshore energy into our energy grid, including the upgrading of the existing network, at the earliest opportunity. Delays in this could see us missing our 2030 targets. Given the change in policy that the Climate Action Plan requires, the upgrading of our electricity networks and the rapid integration of offshore and onshore renewable energy supplies is fundamental to the plan's success.

- Offshore windfarm development does not feature as an element of our National Development Plan (NDP). While this scheme envisages that the National Marine Development Plan (NMDP) will align with the NDP, the NMDP should do more than that and be fully integrated into the NDP. In addition, while all three of the Regional Economic Spatial Strategies reference offshore energy supply, but do not treat the issue in depth. Consequently there remains the risk that new Local Area Plans could be drafted in ways that either do not take into account the landfall of offshore generated energy, or hinder the integration of this energy into the national grid through planning mechanisms which prevent the construction of new grid infrastructure, or by making such development uneconomic (by, for example, requiring that such infrastructure be subsurface etc.)

- While it is envisaged that the Office of the Planning Regulator will have oversight of the National Marine Development Plan, this should occur at the earliest opportunity so that Local Area Plans can be modified, if necessary, to facilitate offshore energy supply.

- As the necessary landfall infrastructure and the grid integration infrastructure, will cut through Local Authority managed 'near shore' areas (as defined by the proposed MPDM

bill) and Local Authority areas which are within the domain of Local Authority council Local Area Plans, we suggest that for offshore energy projects, there should be a strategic investment planning channel, made directly through An Bord Pleanála, and in consultation with the Local Authorities, which ensures that planning permissions include not only the offshore energy generation sources, but also all the landfall and grid integration infrastructure which is necessary to support the development.

- While the Climate Action Plan foresees 3.5 GW as a target for offshore renewable energy generation by 2030, we argue that this should be considered a lower bound for the purpose of planning. Industry estimates that 4.5 – 5 GW of offshore wind generated renewable energy is achievable in the coming decade with a suitable planning environment and appropriate grid investment.

- We support the broad region zoning model of the 2014 Offshore Renewable Energy Development Plan[6] and would be concerned if the Department was to commence pre-assessing the suitability of sites for offshore energy generation as this would create a bottleneck in the approval process which would inevitably result in Ireland missing our 2030 CO_2 emissions targets. As all sites will be subject to environmental impact assessments, the Marine Planning Policy Statement should assume that all areas are open to development unless there is a particular reason, e.g. shipping lanes, security, wildlife reserve designation, for not permitting development, where the environmental impact assessment of the site does not argue against the development.

- Given that the great benefit of offshore renewable energy generation is in the scale of the proposed developments, once the grandfathered schemes are connected to the grid, we argue that all Renewable Energy Support Schemes for offshore energy generation should be of scale, for example minimum auction bundles of 400 MW.

[6] https://www.dccae.gov.ie/en-ie/energy/topics/Renewable-Energy/electricity/offshore/offshore-renewable-energy-development-plan-/Pages/Offshore-Renewable-Energy-Development-Plan.as