



An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreacht
Department of Housing,
Local Government and Heritage

Unique Reference Number: DHLGH-C1-152

Author: Dublin City University

Status: Submitted

Submission:

Enabling Ireland's Offshore Renewable Energy (ORE)
& Renewable Energy Targets: A National Plan for
PORTS & The conundrum of funding for Ports in
Ireland - a new national plan led policy needed to
enable ORE development

Consultation:

Date Created: 12.09.2024 - 12:06

Draft First Revision to the National Planning
Framework

Observations:

9. Climate Transition and Our Environment

Chapter: 9. Climate Transition and Our Environment

In a number of paragraphs across the document and in Chapter 9 terms of "offshore renewable energy" & "off-shore renewable electricity generating" & "renewable energy" & "renewable electricity generating" seem to be used interchangeably. This is misleading for this document.

The term that should be used consistently is "offshore renewable energy" or "ORE" & "renewable energy" as these denote a range of technologies that could be deployed, all which will produce renewable energy, energy carriers, etc, adding to achieving energy targets and some of which will produce just electricity, connected to shore or to the grid with a cable.

7. Realising our Island and Marine Potential

Chapter: 7. Realising our Island and Marine Potential

This consultation on the National Development Framework emphasises a shortcoming when it comes to the development of Ireland's Offshore Renewable Energy (ORE) - which is the absence of a national plan lead approach for the development of strategic Ports.

Ireland does not currently have any Port Infrastructure to deliver the **plans and commitments** that Government have promised to the nation and to its global and EU partners. This will result in Ireland missing its targets, losing investment and pushing higher energy prices onto customers and ultimately being required to pay fines for late development of ORE, which could have been money well spent to deliver the required infrastructure.

As an example on Page 103 of the draft document reads: *"In recent years significant investment has been made to position Ireland's ports for future growth and this has resulted in significant improvements both in terms of capacity and capability. The ports are largely guided by **individual** long-term plans and strategic visions which ensures a plan-led approach."* If ports are acting individually within their own plans and visions how does this sum up to a **plan-led approach**? Strategic Ports competing for limited resources and investment is the ingredients for unnecessary chaos.

Also on page 103: *"The five Ports of Regional Significance identified in the policy have been transferred to local authority control, to ensure that these assets can continue to meet local and regional needs."* "Local and regional needs" are very important and this is commended, however *there are a known limited number of ports, only about 5 Ports of any significance capable of managing and assembling and deploying* Ireland's Offshore Renewable Energy (ORE) and this is the entire country's responsibility, the Nations activity and has national implications if not deployed, not a regional problem and therefore should be led and planned nationally.

In section 7.3 Ports, it is evident the 2013 National Ports Policy is the guiding policy, but it is deficient in the fact that there is no provision for treating the approach to ports as a national infrastructure project to ensure Ireland maximises the ability to deliver the required ORE in a timely manor and utilise, to the benefit of the economy, our ports and our own skilled workforce.

The draft NDF says the following: on page 117 chapter 8 *"Realisation of our offshore energy potential requires a joined-up approach between land and marine spatial planning. New economic opportunities looking to capitalise from ORE."* This is certainly correct but the emphasis is on reinforcement of the grid infrastructure and the development of the interconnector routes, which are important as, besides being import conduits, they are also export avenues for electricity outflow from the ORE if and when it is delivered. As in Powering

Prosperity, ORE is a major development in our economy with the ability to deliver employment opportunity over the next 50 plus years and tap a natural resource that we have. But we need a port infrastructure. The NDF offers nothing in the way of funding and a plan to deliver it.

Through the significant positive work in its legislation, policies and strategies, mentioned in the NDF, around ORE, the Government has adopted a plan-led approach in other aspects of ORE development, but this plan led approach comes to an abrupt stop, when it comes to ports. Why? Ports enable ORE! The reality is, supported by research, there is a very small, finite, number of ports suitable for this rollout. The potential challenge is "investment" which is urgently required (order of magnitude of the day to day spending) . This investment does not affect the approach taken under the current Ports Policy to connectivity, but is required for this new departure, urgently. Unfortunately there is little in the way of solid funding lines and the creation of plan-led central government policy to create the port element of the critical port infrastructure model. However, **a plan is required**, as the delivery of a suitable port infrastructure is a national project and funding needs to be allocated from the NDP and implemented through the NDF.

Published Articles to support the case:

Ireland has no plausible plan to deliver offshore renewable energy

<https://www.irishexaminer.com/opinion/commentanalysis/arid-41472373.html>

Offshore wind could be worth €69bn to Ireland if harvested correctly

<https://www.irishexaminer.com/opinion/commentanalysis/arid-41442757.html>

Ireland needs to develop ports to take advantage of our vast offshore wind potential

<https://www.irishexaminer.com/opinion/commentanalysis/arid-41422483.html>

Ports present 'monumental challenge' to Ireland hitting offshore wind targets

<https://www.irishexaminer.com/news/arid-41403770.html>

Attachments:



DHLGH-C1-152-319 - Article 1-4 - Offshore Wind Energy - 11092024.docx



DHLGH-C1-152-341 - Overcoming Challenges in Delivering Offshore Wind Development for Ireland - Rev 0 - Du...

7. Realising our Island and Marine Potential

Chapter: 7. Realising our Island and Marine Potential

As clearly spelt out in the 2013 National Ports Policy "The policy outlined in the 2005 Ports Policy Statement states that the **ports sector should receive no further Exchequer funding for infrastructure development** or otherwise will be maintained."

In 2013 this policy was fine; what are ports used for in Ireland; fishing, roll-on & roll-off traffic, ferries, containers, milk, beef, pharma, livestock, etc. Ireland does not have heavy steel industry or ship building and not expecting the need for new ports. While the financing of ports can be maintained from the charges on goods and services of the port - all positive for business, competition and less money from taxpayers to pay for port operations.

But we are now in 2024, Ireland has co-signed the Paris Agreement, declared a climate emergency, in-acted laws to decarbonise our energy system and have mandated targets by the EU for the deployment of Offshore Renewable Energy. Noting there are currently no ports in Ireland that are capable of deploying ORE & recognising that to deploy Offshore Renewable Energy, at any scale over the next few years, needs a full re-think and redevelopment of our aging, unsuitable existing strategic ports that will cost money.



- In the North Seas Offshore Wind Port Study 2030-2050, commissioned by the Netherlands Enterprise Agency and done by Royal HaskoningDHV, it found that "Considering the timeline of the offshore wind ambitions, and the fact that institutional development (policymaking, application procedures, governing body) is still in progress, significant investment is required for ports to realise these ambitions, with all large-scale plans indicating cost estimates of more than €100 million per site."
- In a study for the Dutch Embassy in Ireland, Royal HaskoningDHV (RHDHV) estimated that, if Ireland wants to do all the main offshore wind activities in its own ports, a total investment of €2-3 billion would be required.
- If the focus is just on O&M and partial construction support, the investment needed is expected to be closer to €1 billion.

But surely we can get UK or France to accommodate Ireland... The short answer is maybe not, recognising that every country will be deploying ORE and will need their own ports and moving structures hundred of kilometers by boat instead of tens of kilometers will cost huge money ultimately pushing up the end electricity for customers.....

In reality there is NO short-term or medium-term plausible strategy or plan to cover the development of key infrastructural items like ports to deliver offshore renewable energy at scale! The result will be delays delivering offshore renewable energy, delays in electrification of our economy, delays in achieving decarbonisation, inadequate investment in strategic locations, poor economic return to local communities as well as more expensive electricity for customers.

There is also no way that Irish ports can access the level of investment needed, from day to day activities, and nor is there a central plan to do so, with the 2013 Port Policy, the guiding document, which is being reviewed after consultation, needs to be amended to support the rollout of port infrastructure. Funding within the NDP and now the NDF should be made available to support the climate action and while ports play a leading role in connectivity, ports are a co-location for the facilities to enable the rollout of ORE.

Attachments:

-  DHLGH-C1-152-327 - Article 1-4 - Offshore Wind Energy - 11092024.docx
-  DHLGH-C1-152-340 - Overcoming Challenges in Delivering Offshore Wind Development for Ireland - Rev 0 - Du...

Boundaries Captured on Map: No