

## **Submission in response to Consultation on draft Regulations to transpose the Maritime Spatial Planning Directive into Irish law**

### **Comment - Regulation 7.2.**

Given the importance of tourism and particularly coastal tourism to the Irish economy. The **promotion of sustainable tourism** should be specifically mentioned in the regulation text as it is in the Directive 5(2)

### **Comment - Regulation 7.3.**

*“A competent authority shall have due regard to relevant existing and future activities and use and their impacts on the environment as well as to natural resources and shall also take into account the following: Land / Sea interaction”*

### **Regarding “existing and future activities” and “Land / Sea Interaction”**

With regard to the East coast of Ireland, large tracts of environmentally sensitive coastal waters in the near shore areas of Louth, Dublin, Wicklow and Wexford have already been picked out by developers for large scale offshore wind farms on “a first come first served” basis with no spatial planning and indeed no plan for use of the energy generated.. Foreshore leases for construction and foreshore licences for initial investigation were awarded to private developers during the Celtic Tiger era under the Foreshore Act 1933 on the sole authority of the Minister for the Marine with no public right of appeal, no statutory involvement of local authorities, no public tender and no independent professional assessment of land / sea interaction. Public consultation has been totally inadequate. For example with regard to the Codling Wind Park permitted in 2005 in full view of Bray Head, Killiney Bay, Greystones and Wicklow not a single submission was received by the public who, throughout Europe, have shown themselves to be deeply concerned about impact of offshore development on adjoining coasts. All these permitted and proposed developments were rubberstamped in the OREDP, drafted in 2010 and adopted in 2014. The regulations provide no mechanism for dealing with this key issue of existing activities about which there has been inadequate consultation. In fact, very few citizens or the public representatives are aware of the scale of development permitted and proposed.

If the MSP for the East coast is based on “existing and future activities” then private offshore windfarm developers availing of outdated legislation and inadequate regulation, will have determined the future of nearshore area of Ireland’s East coast before any MSP has taken place. This is totally at variance with the purpose of the MSP Directive and out of line with good international practice.

**Coastal Concern Alliance** is an independent voluntary group, set up in 2006 to campaign for reform of the outdated and undemocratic Foreshore Act 1993 governing construction in Irish waters and the introduction of coastal and marine planning to protect the marine environment and balance competing interests in our seas. Email: [coastalconcern@gmail.com](mailto:coastalconcern@gmail.com) [www.coastalconcern.ie](http://www.coastalconcern.ie)