



Marine Institute – Galway Bay Marine and Renewable Energy Test Site Assessment of Application for Foreshore Lease

Introduction

Coastal Concern Alliance (CCA) is an independent citizens' group set up in 2006 to campaign for reform of the Foreshore Act 1933 and the introduction of a democratic system of planning for our marine and coastal areas to ensure that our coastal environment is protected for future generations. CCA is a community group with no political affiliations. The impetus for the setting up of our group was the inappropriate manner in which developers were awarded valuable foreshore leases for construction of the biggest offshore wind farms in the world close to the East coast under outdated legislation during the Celtic Tiger era without any public tender, policy for offshore wind, proper environmental assessment, stakeholder engagement or cost/benefit analysis.

We have been calling on government to review and update coastal zone management since our foundation and have made detailed submissions to over a dozen pertinent public consultations over the past ten years. These submissions are available on our website at www.coastalconcern.ie. In the ten years since our foundation the concerns we have raised about the impact of inappropriately sited offshore wind farms on marine wildlife and landscapes have become mainstream. Throughout the EU, Governments are addressing this issue and have reformed legislation and regulation to take account of public concerns.

Galway Bay Marine and Renewable Test Site

It is clear from the current controversy over the Galway Bay test site that an outdated and undemocratic permitting system is still being used to permit developments offshore which could have damaging consequences for our coastal zone. While the Marine Institute's proposed test site in Galway Bay is of a different scale to the large scale offshore wind developments permitted and progressed off the East coast, the concerns expressed by our group relating to inappropriate governance in our coastal zone apply equally to this case.

We object to the awarding of a Foreshore lease for the Galway Bay Marine and Renewable Test Site due to Ireland's inadequate marine governance and consent process. Specifically:

- The outdated and undemocratic nature of the legislation governing the awarding of foreshore leases in Irish waters (**The Foreshore Act 1933**) which confers sole authority on the Minister to award foreshore leases for construction in Irish waters with no statutory involvement of local authorities and no right of appeal against the Ministers decision.

- The absence of an affordable **public right of appeal** contrary to the Aarhus Convention.
- The fact that large tracts of our sensitive inshore zone (including the test site in Galway Bay) have been leased to developers for construction in the absence of any **marine spatial planning or integrated coastal zone management**.
- The lack of importance and value attached to the **conservation and protection of the coastal landscape and seascape** of Galway Bay, a vital part of Ireland's natural heritage. The test site development is to be located 2km off the Galway coast. This is much closer to shore than the other EU funded FORSEA test site for floating wind turbines i.e. Sem Rev in Nantes, France which is over 12km from shore. .
- The lack of **independent, professional assessment of visual impact** of the proposed development (which includes the introduction of wind turbines 2km off the Galway coast). **Galway County Council** has no statutory role in assessing the visual impact of the proposed development on shoreline views and prospects listed for protection in the County Development Plan. Their submitted comments relate solely to water quality.
- The application will be assessed by the **Marine License Vetting Committee** which is chaired by the Marine Institute and has no independent landscape professional as a member
- The absence of a democratically agreed **Marine Policy Statement** setting out policy for the marine which could provide the context for coastal conservation and development.
- The **Offshore Renewable Development Plan** drafted in 2010 and adopted in 2014 is clearly developer-led and is due for review in 2017. It cannot be viewed as providing a democratic rationale for this development.

Coastal Concern Alliance
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