



Submission to Citizens' Assembly

How the State can make Ireland a leader in tackling climate change

11th August 2017

Ireland could make an impact in ensuring that the introduction of renewable energy to combat climate change is done in a democratic manner with proper strategic planning and democratic involvement. This applies to the introduction of renewable energy on land and at sea

Coastal Concern Alliance is an independent voluntary citizens' group set up in 2006 to campaign for the introduction of coastal and marine spatial planning to protect our coastal environment in line with good practice in other EU countries

The impetus behind the setting up of our group was the realisation that private developers were availing of outdated and undemocratic legislation (Foreshore Act 1933) to obtain foreshore leases for vast offshore wind farm development in the near shore zone of Ireland's East coast in a planning vacuum without the knowledge or involvement of the majority of Irish people or their public representatives. Under the foreshore legislation drawn up before offshore wind farms were envisaged, foreshore leases for construction were awarded in 2002 for 520MW Arklow Wind Park (200 turbines) and in 2005 for 1100MW Codling Wind Park off Bray Head (220 turbines) on the sole authority of the Minister for the Marine. Leases were awarded on a "first come first served" basis. There was no prior selection of sites by government, no public tender, no statutory involvement of local authorities, no independent professional assessment of visual impact and no ban on the sale of foreshore leases before construction. The obtaining of a foreshore lease for minimal outlay represented a fantastic windfall for developers who could "flip" the lease before construction at a price based on the size of development permitted.

Other private developers moved to stake their claim to large sections of inshore coastal waters, applying for foreshore licences to investigate potential projects with hundreds of turbines off Dundalk (Oriel Wind Park), Dublin (Dublin Array) Wicklow (Codling Wind Park 2) and Galway Bay (Sceirde). All this activity took place in the Celtic Tiger era of speculation and inadequate regulation. The handing over of large tracts of national near shore waters to private developers without any strategic plan is surely one the biggest planning failures in the history of the State.

The Offshore Renewable Energy Development Plan 2014, drafted by Minister Eamon Ryan in 2010, is a clear case of retrospective planning, serving to accommodate all the offshore wind projects permitted and progressed with no Plan and no Strategic Environmental Assessment in the previous decade. Officials and indeed most politicians are well aware of this legacy. In 2008, Simon Coveney then Fine Gael Energy spokesperson issued a press release (attached) calling for reform of the Foreshore Act stating "*the planning system as it currently exists is entirely inadequate for what are major projects to construct enormous turbines within clear sight of the Irish coastline.*" That press statement was issued ten years ago and still no reform has taken place.

There is now a welcome move to introduce Marine Spatial Planning in Ireland , necessary to conform to a new EU directive. However the problem remains that some of the biggest offshore wind farms in the world have already been permitted and progressed close to Ireland's East coast in manner which is totally out of line with good international practice. Unless this legacy is acknowledged and

addressed, then a handful of developers will have succeeded in shaping the future of our beautiful, high amenity East coast with no involvement of local communities or local authorities.

There is widespread acknowledgement that offshore wind farms must be to a proper scale and be properly sited to avoid damage to marine wildlife and coastal landscapes. Other EU counties have introduced 22km buffer zones to protect their sensitive in shore zones, wildlife and coastal landscapes. The average distance from shore of offshore wind farms under construction in the EU in 2016 was 40km. The average distance from shore of offshore wind farms permitted and progressed off Ireland's East coast during the Celtic Tiger era is 10km. The visual impact of this massive construction on "coastal views and prospects" listed for protection in county development plans has not been independently assessed. (See attached)

In contributing to resolving the problem of global climate change, Ireland must ensure that we protect our own environment and heritage. Our coastal zone is still largely unspoiled. It is central to our quality of life and our tourism. To provide global leadership in environmental protection, we must work to keep it that way and ensure that any development that takes place is democratically assessed and is truly in the national interest.

In support of our submission we attach

1. Assessment of the Visual Impact on Preserved Shoreline Views, 2013.
2. Fine Gael Press Release 2008
3. Offshore Wind: Ireland's regulatory regime out of line with other NSCOGI countries

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