



Mr Phil Hogan
Minister for the Environment
Department of Environment, Community & Local Government
& Local Government
Custom House
Dublin 1

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Re: Providence Resources: Application MS 51/4/541

Dear Sir,

Coastal Concern Alliance (CCA) is an independent, voluntary body established in 2006 to campaign for reform of the Foreshore Act 1933, governing construction in Irish waters, and the introduction of coastal and marine spatial planning. We have written to successive Ministers for the Marine and Ministers for the Environment on numerous occasions highlighting the deficiencies in the current planning framework and the urgent need to:

- Reform the undemocratic, outdated Foreshore Act 1933
- Introduce a system of Marine Spatial Planning to balance competing interest in our seas
- Introduce Integrated Coastal Zone Management to ensure a dovetailing of planning between the coast and adjoining waters.

The Providence Resources application for a Foreshore Licence to explore the potential for an oil or gas prospect, 6km off the coast of Dublin in the Kish Basin is being considered under the Foreshore Act 1933. This legislation is acknowledged to be unfit for purpose. Under this Act, the Minister has total control over development in the coastal zone. There is no statutory involvement of local authorities and no public right of appeal against the Minister's decision. It is clear that this outdated legislation is inadequate to properly and democratically assess the large scale industrial development currently proposed in Ireland's valuable inshore area. We have already put on record to your Government our concerns about the manner in which foreshore leases for extensive offshore wind farm development (420 turbines 10/12 km off Wicklow) and foreshore licences for initial exploration for large scale offshore wind farms off Dublin, Louth and Galway were awarded to private developers during the Celtic Tiger era under this outdated legislation without proper public scrutiny.

We are concerned about the following issues in relation to the Providence Resources application:

- Deficiencies in the current planning framework rendering it unfit to properly assess large-scale industrial development in sensitive near shore zones.

- The national and local importance of Dublin Bay, arguably the country's highest amenity area and the impact of development on the character and quality of coastal landscape/seascape and "views and prospects" listed for protection in Dun Laoghaire Development Plan.
- The proximity to shore (6km) of the proposed development. (We understand that this is the first application for a foreshore licence for oil/gas exploration inside Ireland's 12 nm (22.2km) zone.
- The inadequacy of environmental baseline data (e.g. distribution and relative abundance of cetaceans in prospect area)
- Scientific uncertainty about the impact of drilling, noise and seismic surveys on marine life.
- The inadequacy of oil spill contingency plans and the potential impacts of a spill on the natural heritage, economy and international reputation of the country.

Public Inquiry

The Foreshore Act 1933, (Section 3.9) states that whenever an application is made for a licence the Minister "*may if he thinks fit hold a public inquiry in regard to the granting of such a licence*". This clause provides the only semblance of democracy in an otherwise deeply undemocratic piece of legislation. **In view of the serious concerns listed above, Coastal Concern Alliance urges the Minister to hold a Public Inquiry so that the risks and benefits of the proposed Kish Basin exploration can be fully and transparently examined.**

Conclusion – Coastal Planning and 22km Buffer Zone

The mis-management of Ireland's coastal zone, particularly evident during the Celtic Tiger era, has now reached crisis point. Extensive, developer-led projects have been permitted and progressed under outdated, undemocratic legislation with no overall vision for our seas, no marine or coastal planning, no coastal landscape/seascape protection and inadequate survey and designation of Natura 2000 sites to protect vulnerable marine wildlife and habitats.

The potential for serious damage to Ireland's coastal zone is now very real. We urge the FG/Labour administration to:

- Ensure that no large scale industrial development is permitted in Ireland's near shore zone, until a modern, democratic system **of marine and coastal planning** is introduced, in line with EU policy.
- Introduce a **12 nm (22.2 km) buffer zone** around our coast, in line with emerging best international practice, to protect Ireland's precious coastal landscapes and wildlife into the future.

Yours sincerely

Helen Gelletlie
CCA Policy Team

www.coastalconcern.ie