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## **Sceirde Offshore Wind Farm**

**Submission on behalf of**

**Coastal Concern Alliance**

**27<sup>th</sup> February 2009**

## Introduction

Coastal Concern Alliance note, and are supportive of, the following concerns and objections raised by certain key stakeholders who were consulted during the preparation of the EIS.

- **Mace Head Management Committee** contends that the development would have a “devastating impact” on the important research work of the Mace Head Atmospheric Research Station.
- **Failte Ireland** state “the wind farm is likely to have a significant negative effect on the landscape character” and that “the primary tourism resource in the area is the distinctive and characteristic landscape and this must be protected”.
- **An Taisce** expresses a number of very serious concerns. These include concerns relating to protection of coastal and marine habitats and of seabirds, many of which are listed in Annex 1 of the EU Birds Directive. They query the site selection procedure. They emphasise the need for preservation of biodiversity, which is one of the cornerstones of sustainable development, and they point out that the proposed development needs to be considered in the context of pertinent EU Directives and the European Landscape Convention. Specifically, An Taisce highlights the fact that Ireland has been warned by the European Commission about the deficiency of our implementation of the EIA Directive, due to activities such as project splitting.
- **Galway County Council planning department** focus on “the importance of the Connemara landscape in the leisure and tourism activities which support much of the economic activity in the area”.

## Observations

Coastal Concern Alliance note that the cable landing site, cable routes onshore, buildings and installations fall within the area of the adopted Gaeltacht Local Area Plan, and are more generally covered by the Co. Galway Development Plan 2003-09.

### 1. Policy context

The Government, acknowledging that current legislation and regulations are outdated and inadequate, has set in train a reform process, under the aegis of the Department of the Environment. It is clearly inappropriate that a decision should be taken in relation to this project under discredited legislation which poorly mediates conflicting interests in the coastal zone.

Support for renewable energy has to be balanced against the need to protect the natural beauty, cultural heritage and wildlife of the area.

### 2. Land & Seascape: Visual Impact

No country in the world has permitted the massive 5MW (140m high) turbines proposed so close to shore – 5km at closest point. We judge the impact of this industrial array of machines to be absolutely visually unacceptable. The proposal would result in significant alteration to the character of the seascape, which would lose its wild aspect.

**An independent professional visual impact analysis must be carried out on this project.** An accurate assessment of visual impact can be made by comparing the proposed development with the “in the field reality” of the Arklow Bank Offshore Wind Farm which consists of seven 3.6MW turbines (124m high), 10km offshore.

The studies carried out by Galway County Council, both in the County Development Plan and the Local Area Plan for the Gaeltacht, rate the landscape of the coast in this area in the highest possible category of importance, ranging from 5 (unique) The Aran Islands, to 4 (special) with some areas as 3, (high sensitivity). These designations form part of the Development Plan and, in accordance with the importance placed on the landscape containing the foreshore on which the development is proposed, the offshore wind farm should not be permitted in accordance with the policies 104 to 107, quoted below-

*104: Include landscape Sensitivity Ratings as an important factor in determining development uses in areas of the county.*

*105: Afford protection to views of amenity value.*

*106: Protect designated areas as both environmental resources and economic assets.*

*107: Preserve the character of the landscape where, and to the extent that, in the opinion of the Planning Authority, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest.'*

- The landscape of South Connemara, which would be changed permanently to accommodate these industrial scale towers 140m high, is of national importance.
- It has unique cultural associations and has been an inspiration to artists and writers including Sean Keating, Paul Henry, W .B. Yeats, and J. M. Synge.
- Unlike many inland landscapes formed by agriculture and human habitation, its natural form of rock and sea, shore and sky, is largely a natural biosphere.

### **3. Nature Conservation Impacts**

#### **Fish and marine life**

- The littoral and benthic communities will be affected during the construction (when huge quantities of silt will be emitted) operation, and decommissioning.
- Studies have shown the electromagnetic field from undersea cabling as well as the sound emitted by the turbine motors and blades can affect certain species.
- In the severe storm events normal in the ocean area, it is highly likely the rock armour proposed for the cables across the rocky sea base will be unstable over time, and sand scouring will occur. This would expose all species to the electromagnetic field emitted, a possibility not addressed in the EIS.
- Galway Bay is a habitat for harbour porpoise and bottle-nosed dolphins, listed on Annex 2 of the EU Habitats Directive. The EIS fails to address adequately the possible impact of noise, electromagnetic fields and displacement of these species.

#### **Birds**

- There is a very real risk of bird collision and mortality in some extremely rare and threatened species (Red Book and Annex 1 lists). The EIS states (p 21 of the non-technical summary) that the risk of collision with turbines is low to medium for certain key species such as divers, terns, and skua. The effects while small may be significant for some Red List and Amber List threatened birds, as some of these species are in steep decline. The 20 year life of the installation may be enough to have a very grave effect.
- The applicant has failed to produce independent monitoring of bird counts in the site area, notwithstanding the obligation under the EU Birds Directive to do so.
- The flight paths of migrant birds may be impacted by the turbine blades and wind disturbance.
- Night lighting of the turbines which would be necessary for air and ship safety has also been shown to increase the risk of bird collision.
- We agree with the rejection in the EIS of the option of a landing in Ards Bay, Cuan ha hAirde, which is within Kilkieran Bay and Islands. Candidate (002111) SAC.

#### 4. Tourism

- The visual impact assessment of the turbine installation shows that the development will affect many of the best known and loved views and prospects of the area.
- We note that the EIS seems to concentrate on the views of the motorist. Bikers and walkers form an additional important tourist and inhabitant group.
- The theory that, at distances of 10km, the impact is minimal is not accepted internationally and is one of the reasons why international practice is moving toward installations at least 20km offshore. (Germany, Belgium and the Netherlands have banned offshore wind farms inside the 12 nautical mile limit (22.2km) to protect the scenic amenity and wildlife of their coastal areas.
- Research, independently funded and validated, should be undertaken to determine whether tourism in the area would find the alteration of the seascape and landscape from locations such as Aran, Gorteen Bay and Mairos a positive or a negative impact. The opinion expressed in most submissions seems to be that the impact would unquestionably be negative.
- The restrictions on the recreational use of the sea area would also be an adverse effect of the development.
- The unique and special character of the pristine landscape, identified by Fáilte Ireland's submission as a key tourist attraction, would be irreparably harmed by this installation.

#### 5. Archaeology, built and cultural heritage.

We note the stated policy (131) in the Co. Galway Development Plan, 2003-09.

*“Support the preservation, conservation and maintenance of archaeological sites, together with the integrity of the setting of these monuments and sites. Development, which would destroy, alter or damage monuments or archaeological sites, or cause inappropriate change to their settings and character will be prohibited.”*

- St Mac Dara's Island is, as the EIS states, “one of the classic early stone church sites that define early Christianity across Ireland”. This church is within 410m of one of the proposed cable landfalls, the turbines are less than 3km away from the island and church. **The importance of curtilage and setting is recognised in the charter of Venice and Granada, both important conservation documents of principle, recognised in the 2000 Planning and Development Act. This site must be rejected on the grounds of irreversible damage to the curtilage and setting of this monument.**
- As noted in the applicant's EIS, the marine component of the development is proposed on a site, as noted in the EIS prepared by the applicant, where the survey revealed significant anomalies underwater which could be remains of importance. **Strong conditions should be attached to any consent concerning the further investigation of same. Chosen cable route should be modified to avoid site of any finds.**
- **All cable landing sites suggested would have significant impact on the existing rich archaeological and built heritage of the area.**

## 6. Other impacts

### Connections

- The chosen site is remote from the national 110kV grid. This line is to be located in an area of landscape graded 4 in range of sensitivity and importance from 1-5, even if just outside SAC boundary.
- Contrary to the statement in the EIS, the cabling and its impact should be included in this EIS as it is an integral part of the project. We believe the line and pylons would be visually unacceptable. We query whether the additional infrastructure cost and possible visual effect of an upgrade line if required from the sub-station to Galway has been taken into account in the proposal.
- We further note that '*a new 38kV overhead line would be initially required to take the power to a new local 38kV substation, where both would have to be upgraded to 110kV in phase 2. An overhead power line of the same voltage would be constructed over land to bring the generated electricity from the substation to Camus.*'

### Maintenance

- We note the comment in the EIS that 'no prudent mariner would go near the area'. How is it proposed, under adverse weather conditions, to access the installation for maintenance?
- We note that the Western Regional Fisheries Board comment on the issue of storms during construction and operation. Weather related downtime could significantly reduce plant availability and output.

### Decommissioning.

- The proposed foundations being of monopile type, 6.5m diameter, drilled 30-35m into the rock, will be so substantial that we do not consider it likely or possible they will ever be removed. The industrialisation of the offshore reef on a permanent basis is not an acceptable form of development.

### Conclusion

In conclusion, may we bring to your attention the Hague Declaration on Wind Power (2004) from the Council of Europa Nostra, the pan-European Federation for Heritage.

*"The Council also considered that many countries have so far tended to focus too heavily on wind-power, whether on or off shore. They have provided heavy incentives for its development, relaxed planning legislation, and failed to make a balanced assessment of its merits and demerits, with the consequence that vast areas of beautiful landscape throughout Europe are now dominated by groups of ever larger wind-turbines - every one of which constitutes a small power station - and are thus being effectively industrialised, with consequent serious damage to the natural heritage."*

**Offshore wind farms must be to a proper scale and properly sited. The proposed project fulfils neither of these criteria. We urge a comprehensive rejection of this application.**

This inappropriate proposal highlights the policy vacuum within which developers are applying for valuable foreshore leases in Irish coastal waters. It underlines the urgent need for introduction of a modern system of marine governance which takes into account, inter alia, the principles in the EU Maritime Green Paper and the EU Marine Strategy Framework Directive.

### Coastal Concern Alliance

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