

Having reviewed the consultation document to Inform a National Grid Development Policy for Offshore Wind I wish to make the following observations in relation to same.

I am a planner/geographer, commercial charter boat owner. I have spent a great deal of time at sea off the south coast of Ireland and thus have been in the relatively unique position of having observed to a large extent the diverse marine wildlife abundance which exists here. There are still extensive information gaps concerning the extent of our aquatic wildlife and other wildlife which regularly migrates into and out of this area. These gaps have been acknowledged in the environmental reports accompany the OREDP 2014 (as updated) and the Draft Marine Planning Framework 2020, amongst other publications by NGO's recently. As a planner I am passionate about quality plan making. Robust evidence based baseline analysis is a prerequisite for quality strategic plan making on land. There is no less a standard for plan making in a marine environment, in fact the quantum of environmental baseline spatial data to be gathered to inform the plan making/ regulate what can and cannot go where is much greater.

It is in the context of these marine environment information gaps that my main concerns lie, and subsequently running the risk of producing light evidence based plans for offshore wind development, which in the mid to long term, are likely to be found as conflicting with European Environmental Directives, misguide developers and ultimately adversely and irreparably alter our marine ecosystem.

The current thrust of government policy towards offshore wind development is clearly the fast tracking of same. Indeed this current consultation document flags the importance of timely decisions being made on which grid delivery model be adopted in Ireland, so that 2030 renewable targets can be achieved. Notwithstanding the merits of such targets, a robust evidence based plan led approach to delivering offshore wind is a must. There are no short cuts, without prejudicing wildlife!! The current consultation amazingly probes the viability of a developer led approach to offshore wind development in Ireland, citing precedence from elsewhere in Europe. First and foremost Ireland's territorial seas are not directly comparable with other European coastal countries, Irelands seas being infinitely more rich and diverse with marine wildlife and thus more susceptible to greater adverse environmental impact. While a developer led approach to offshore wind may have been suitable in a less diverse marine environments elsewhere in Europe, Irelands marine areas off the south and west coast warrants nothing other than robust evidence based plan led approach to grid development for offshore wind

Pardon my scepticism, but the notion of developer led grid development does not resonate well with me, given the quantum of unknowns in Irish waters and reconciling wind farm infrastructure with same. e.g. undersea emf's grid impact on the aquatic species, impact of wind farms beyond protected areas such as foraging areas for marine birdlife, mapping of these foraging areas and the migratory routes of fish, birds and other aquatic mammals. From my experience and observations of aquatic wildlife off the south coast when the 2

foregoing extent of unknowns are determined then the resulting remaining offshore spatial area which would be suitable for windfarm development, may be significantly more limited than currently envisaged.

Having recently reviewed some foreshore consent applications from the private sector for wind farm investigation works off the south coast I would remark that there are still information gaps in the ecosystem analysis accompanying same. I thus submit that there is no substitution for a state/semi-state led strategic critical appraisal of the receiving environment for offshore windfarm generation, and to plan accordingly thereafter given what is at issue around our coast. In light of the foregoing, naturally of the four grid delivery models outlined in the consultation document I am advocating a state/semi state plan led delivery model for offshore wind development in Ireland- anything short of this will fail to achieve any reasonable level of coastal community buy in and public support. Accordingly, option 4 would be my first preference followed by Option 3.

In summary you cannot properly plan without resolving the existing extensive information gaps which exist in our marine environment and should the state proceed to fast track planning for offshore wind in the absence of same , it will find itself at variance with EU Environmental Directives, vis a vis proceeding to zone marine areas for development amidst shortcomings in existing designations and protections, with potential allegations of non-adherence/implementation of appropriate marine wildlife safeguards. Trusting the foregoing is of assistance.