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To: ORE Consenting

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RESPONSE FROM KILLINEY BAY COMMUNITY COUNCIL TO THE OFFSHORE RENEWABLE ENERGY MARITIME AREA CONSENT (MAC) ASSESSMENT FOR PHASE ONE PROJECTS

In this Response we request a Cost-Benefit analysis in regard to the proposed siting of multiple large wind turbines within and near to Killiney Bay, 9 km. from the shoreline. This analysis should take into account the financial value of our coastal ecosystems, (sandbanks, marine and avian inhabitants), and factor in the value of our pristine bay, local scenery, water sports, tourism, and public enjoyment, in the context of the operational definition of Marine Protected Areas. In particular, we request the measurement of the financial value of the Kish and Bray sandbanks as spawning grounds for fish and molluscs, and feeding grounds for seabirds.

We seek a formal valuation of the natural capital inherent in our coastal and sea biogeography: a calculation which connects effective marine protection planning in the context of, and related to, Maritime Area Consent Phase One Projects.

Costings are an essential condition for a public understanding and appraisal of the profit and loss balances deriving from the installation of multiple wind turbines within and near the Killiney Bay area. We request a valuation of the natural capital inherent in our local biogeography. We request the measurement of the capital value of our maritime environment, via a system of accounting based on data evidence of present and future financial value gain, or loss. Economic metrics make it possible to integrate ecosystems into economic price ratios compatible with market finance. Consistent with this measurement of eco-value, we request an appraisal of 'ghost death' from damage by trawling on the seafloor and to dependent sea stock.

We seek the inclusion of a national capital accountancy of the impact assessment in Phase One Projects, covering the installation of wind turbines nearshore at 9 km. This means that there will be a requirement to factor the monetary value of, offset by the damage to, the benthic ecosystem proximate to the Dublin Bay Biosphere and proximate Special Area of Conservation Rockabill to Dalkey, which extends along Killiney Bay southward. This valuation should be considered in the context of over 200 large wind turbines to be located adjacent to this SAC

Effective Marine Planning in the context of Phase One Projects:

An effective Marine Protected Area policy must ensure that there is a sustainable provision of protection for existing ecosystem sources of value in the context of the installation of wind turbine generation services.

This protection includes:

1. Consideration of coastal protection in the light of natural erosion and rising sea levels, together with the effect of further erosion caused by industrial development.
2. The need for a scale of measurement of the possible detrimental effects of nearshore wind farm turbine construction affecting marine biosystems at 9 km, in view of EU policy preference to locate off-shore wind energy generation at the 22 km mark.
3. Increasing protection of the Irish shoreline and coastal sea area from 10% to 30%, according to the Pristine Ocean concept, to allow the regeneration of breeding capacity of fish and crustaceans, who are depleted by bottom trawling and dredging.
4. Taking account that MPA refers to a defined area which include permanent shallow marine waters, sea bays, straits, lagoons, estuaries, shallow marine waters, and subtidal aquatic beds. Sandbanks in the Irish Sea should be considered in the context of the renewable energy sector. Marine biodiversity and productivity in near shore sandbanks may be considered as equal priorities as managed renewable energy locations for near shore wind turbines.
5. Taking account that Marine Planning Assessment policy should be designed to be compatible with Ireland's commitments under international instruments such as the EU's Marine Strategy Framework Directive, OSPAR Convention, UN CBD and Aichi Targets (11) and UN Sustainable Development Goals (14).
6. Taking account of increasing pressures which inhibit the development of protected marine space; there is an evident risk of a reactive, development-led regime emerging by default, which operates via imposition of legislation with an adverse effect on ecosystems. There is a risk that legislation enacted in favour of wind farms will be without accountability for the protection of the nearshore environment.
7. Taking note that although underwater sandbanks are not listed in the EU Habitats Directive, neglecting these environments may lead to the lack of protection of biodiversity. Extending the MPA network thus becomes a civic requirement to enact an ecosystem-based marine spatial protection plan, supported by appropriate legislation.
8. Taking note that there is no definition of MPA in Irish law specifically designed to protect off-shore biodiversity in conjunction with the installation of off-shore wind turbines. Either biodiversity is excluded from legal protection, or, legal compatibility is a necessary adjunct, as cited in the Ecological Study of the Kish and Bray banks for a proposed off-shore wind farm development.
9. Clarification of language: The absence of a definition of 'Relevant' now used as a legally binding concept. We find no definition of this term in the Glossary provided in the document, Offshore Renewable Energy Maritime Area Consent (MAC) Assessment for Phase One Projects.
10. Accepting that the government is obliged to define, contextualize, and connect language used in statements of intention inherent in policy, and particularly, in reference to scientific objectives. Terminologies must be clear

in the legislative text addressing the simultaneous effects of turbine installation on ecosystems, and vice versa.

11. Accepting that rules and responsibilities involved in the planning process must be clearly defined, so that public understanding of the stakeholder participation process provides context, objectives, constraints and codes of conduct, (and consequences of not complying), in the context of the imposition of wind farms on ecosystems.
12. Resolving conflict among interests of stakeholders could be managed via Community Voice methods. The National Marine Planning Framework will enable the installation of near-shore wind energy generation, however, the need for wind energy must be balanced in connection with the adverse effects on identified biodiverse in-shore sandbanks adjacent environments. We are glad to note this statement in the National Marine Planning Framework/Project Ireland 2040, Appendix D: Sub-National Planning and Spatial Designation:

"As Marine ecosystems continue to contribute to the sustainable use of marine goods and services by present and future generations, the capacity of marine ecosystems to respond to human-induced changes will be monitored to ensure that this capacity is not compromised. There is a role for the NMPF in terms of ongoing monitoring of collective pressure of all activities and this will inform marine planning and management activity to help ensure activity is kept within levels compatible with the achievement of good environmental status."


Killiney Bay Community Council
January 18th, 2022

Sources:

Maritime Area Planning Act 2020. Expanding Ireland's Marine Protected Area Network

OECD Expert Group on Marine and Coastal Protected Areas

Marine ecological study of the Kish and Bray banks for a proposed off-shore wind farm development. Commercial fisheries Report prepared for Saorgus Energy Ltd., Kerry Technology Park, Listowel Road, Tralee, Co. Kerry, June, 2011. Prepared by Ecological Consultancy Services, Ltd.

