



South East Coastal Protection Alliance DAC



7th March 2022

Phase Two Consultation
International and Offshore Energy Division
Department of Environment, Climate and Communications
29-31 Adelaide Rd, Dublin
D02 X285

By email to phase2@deccc.gov.ie

Re: Offshore Wind - Phase Two Consultations – Dec 21

Sir,

We (SECPA) are an interested party concerning the development of the policy framework for Phase 2 Consultations ORE Developments. We note that the deadline for responses has been extended to 7th March 2022.

A major issue with this document is that it erroneously states that OREDP 1 was reviewed. This is not the case. An interim review of the actions laid out in OREDP 1 was carried out in 2017, but the required FULL REVIEW of the plan and its SEA that was due to be completed in 2020 has not been initiated. This is a serious breach of the requirements.

The link you provide (page 4) of the Consultation document brings you to the Offshore Renewable Energy Development Plan (OREDP) Interim Review May 2018 which references the need for a full review

“The OREDP commits to an interim review of the plan and associated Strategic Environmental Assessment (SEA) in 2017, with a full review of both to be carried out in 2020.”

It appears this full review was never carried out.

Examination of the Interim Review shows the following references to Environment. Under Action 9 (Page 23) of the Interim Review it says

“Challenges · Lack of ORE development – There is an absence of environmental data or monitoring results to indicate potential significant environmental impacts arising from the development of ORE installations.

This is a true statement and with respect to development of Wind Farms on the East Coast sandbanks is a serious shortfall.

The Recommendation under environmental Monitoring is: -

R.24: Investigate the development of a seascape/landscape character assessment.

“The OREDP commits to an interim review of the plan and associated Strategic Environmental Assessment (SEA) in 2017, with a full review of both to be carried out in 2020.”

Was an investigation with respect to a *landscape character assessment* on sandbanks ever carried out with reference to the fact that Sandbanks are an Annex 1 Habitat, and which should in any event be a Marine Protected Area?

The failure to carry out this review is a serious breach of the requirements.

With respect to the SSE Renewables/Sure Partners current application to build a Wind Farm on the Arklow Sand Bank, it is noted that their application is for an extension of the lease that they once held. That lease no longer exists as it has expired.

As the lease has expired on the Arklow Sand Bank and if such a development is to be further considered by the Dept then -a “*landscape character assessment*” must therefore be carried out to establish the suitability of this location for seabed disturbance and wind farm construction. Such an assessment should be carried out on all Wind Farm developments on sand banks as they were conceived under outdated and now redundant legislation.

Whilst we welcome wind farms to be built off the east coast of Ireland, we are perplexed why there is so much reliance on building an enormous industrial complex on a recognised EU habitat. Sand dunes, sandy beaches and sand banks are all part of a complex and integrated system that should be protected, not destroyed with miles and miles of underwater cables and construction of 62 enormous turbines whose footprint is bound to change forever the tidal flow and with a real risk of stripping the beaches of sand and cause a significant hazard to the many birds (some on the endangered red list) that fly over and feed on the sandbank.

The Department should have the courage to stop this development and insist that the turbines are built on floating platforms further out to sea where they will do less harm.

The Format of this Consultation with its restricted (or directed) terms of reference preclude any meaning full consultation or submission from non-energy player parties. The whole consultation is therefore not fit for purpose and needs to be withdrawn, redrafted, and relaunched with adequate public notice

We make the following further submission considering the restricted format allowed: -

Question 4 assumes that Phase 1 is a done deal which it clearly is not as outlined above.

There appears to be no obligation on Power generators to supply only the Irish Grid.

Eir Grids Roadmap appears to have been prepared with a focus on the proposed East coast windfarms rather than an objective assessment, minimising the South / West element in spite of the grid's premier supplier Moneypoint, being located in that region with all the associated heavy grid networks.

The whole state approach to licencing is flawed from start to finish, The Irish approach is a Developer led whereas the correct approach is seen in other jurisdictions. I.e. Plan led.

E.g., The US Bureau of Ocean Energy Management (BOEM) has completed the country's biggest offshore wind auction after three days and 64 rounds, and the six offered lease sites gathering a total of USD \$4.37 billion that will go to the US Treasury.

Ireland could certainly Benefit from such an approach

Innovation Categories, this section (7) is given a fleeting reference while any study of offshore wind developments clearly show that floating technology has advanced rapidly with green hydrogen production rapidly gaining progress. Wind Farms on Sand Banks is old and outdated technology and is not suitable for the East Coast of Ireland.

Sure Partners promise to supply enough power for 450,000 homes is a myth, what happens when there is no wind, especially so close to the shore. It is well known fact that there is better wind further out to sea. Another issue is how much of this power will go to keep the data centres going?

The public should be better informed about the risks and dangers posed by placing a wind farm on a sand bank and this project placed on Sand Banks so close to shore should not be permitted. There is very little information about these wind farms and in the case of the Arklow Bank, Environmental Assessment Reports are not available to the public. Another major concern we have is how will these applications be assessed and will the reasoning behind these decisions be made public and accountable.

Will the experts involved be prepared to stand over a possible positive decision, especially as many of the other sandbanks further down the coast are already SAC's (Blackwater, Lucifer, Moneyweights and Long Bank)? There is no material difference between the Arklow sand bank and these other sandbanks.

Ireland is suffering an enormous threat to its biodiversity from many angles, and this is just one more. In fact, Ireland is being taken to court by the European Courts of Justice and the European Commission has claimed that Ireland is failing to manage its network of protected Natura sites in line with EU law in proceedings lodged before the European Court of Justice. In records just published, the Commission claims that Ireland "*generally and persistently failed to comply with [the Habitats Directive]*".

There are seven existing turbines on the Arklow Sand Bank and no work has been carried out to see what impact these turbines have had on this habitat. A dumping at sea licence has been granted to the operators to remove 100,000 tonnes of sand and dump this material at sea. This must ring alarm bells as to the impact that the proposed 500/600 turbines to be built off the east coast will have.

South East Coastal Protection Alliance DAC ('SECPA') is a voluntary group composed of local residents and concerned individuals who are worried about the possible devastating impact that developing a wind farm on the Arklow Bank will have on the coastal environment. The primary objectives of our organisation are to ensure protection of all ecosystems along the shorelines including all sand dunes, fens and SAC/SPA areas, to ensure protection of offshore habitats including sandbanks, natural flora and fauna, marine habitats including all fish species, birds, seals and dolphins and to prevent further coastal erosion.

We believe that wind farms should be built on floating platforms further out to sea where there is better wind. It is both technically and logistically possible to place these turbines on floating platforms as is planned by the ESB at Moneypoint.

Yours sincerely,



Chairman & Director



Secretary

South East Coastal Protection Alliance 

