

Response to the draft DMAP June 2024

Blue Horizon

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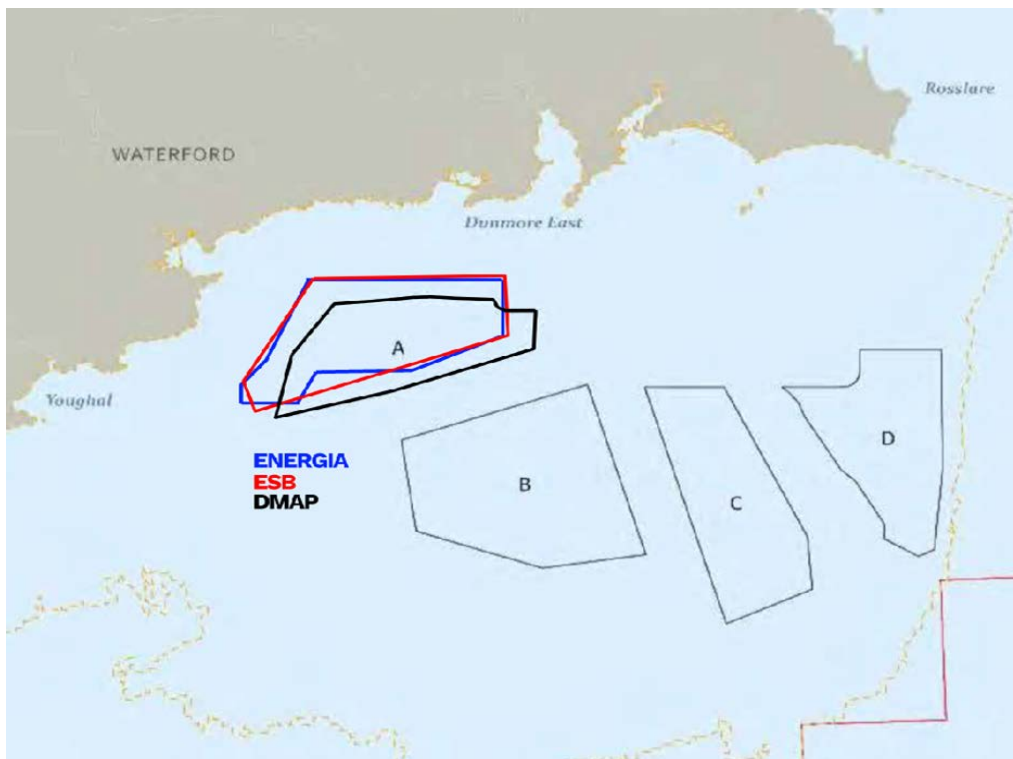
A Chara,

Blue Horizon represents a community group based along the south east coast who advocate for the protection of Ireland's coastline, associated biodiversity and seascapes from large offshore renewable energy developments. We support the development and introduction of policies supporting sustainable planning, development and environmental issues associated with offshore windfarms. We strongly advocate the introduction of offshore floating wind technology. On behalf of Blue Horizon, we would like to make the following observations on the draft DMAP

Offshore wind will play a key role in Ireland's effort to tackle climate change. In relation to the launch of the South Coast DMAP in July 2023, Blue Horizon would like to acknowledge and welcome the move away from a developer led to a State led planned approach to the development of offshore renewable energy projects in Irish waters. Given the significant challenges and obstacles which the government has faced with regard to offshore renewable energy (ORE) development heretofore, it is imperative that the government ensures that areas selected for ORE development within the south coast DMAP proposal area are sensitively located and comprehensively take account of the views of the Waterford public. We are

calling for all offshore wind projects to be placed **at least 22km from the Waterford coast**. Our coastline is going to irreversibly change; politics and profits must in no way influence this change. The decision on where to locate the south coast DMAP and the energy projects within this area, must ensure that our coastline is not industrialised, that biodiversity is protected, and that damage is not caused to our tourism economy. It must also be done in a manner that protects our heritage and our cultural identity including our inshore fishing community. Following considerable input by our members into the DMAP consultation process over the last twelve months, we are very disappointed and concerned by what the Department has produced. It is evident that the voices of over 1,400 Waterford people have been ignored.

In 2023, the government decided, with parliamentary support, that the state should designate areas for offshore renewable energy (ORE) development. The goal was to pre-select suitable zones for developers to apply for through a democratic process. However, the draft DMAP is not truly plan-led. The previous developer-led system, criticized for its lack of oversight and environmental assessment, still seems to influence the process. For instance, in 2020, the government advanced several offshore wind projects without proper site selection or public participation. One of these projects, granted a foreshore license to Energinet, is now included in the South Coast DMAP as Site A, appearing as if it was chosen through a reliable process when it was not.



The Department, during a recent webinar, stated that the draft DMAP has been produced following a planned regime whereby “*specific maritime areas that have been identified **in cooperation** with local coastal communities*”. That is wholly untrue.

The Department also stated that “*public consultation has been and will continue to be a central key pillar to the establishment of the DMAP*”. Again this statement is questionable.

Tonn Nua, Area A, is not acceptable to us or to the people of Waterford. Several thousand members of the public support our petition to remove site A in its current form the draft DMAP (<https://www.change.org/PreserveWaterfordCoast>).

As we have highlighted to you before, ORE developments are underway in water depths of between 65m and 75m (Morven Offshore Wind Project). The continual assertion by the Department that this is not possible leads the public to be sceptical as to the real key drivers behind this draft plan.

The Department stated that an eco-system based approach was used to identify the highest cumulative environmental constraints which was “*assessed through analysis and consideration of data layers including distance from shore*”. The SEA provides little if any analysis with regard to visual impact, the key area which the public highlighted was of immense importance to them.

The Department assert that the environment has come first; it may well have been considered first but it is our view that technical and financial considerations have heavily influenced this draft DMAP and that inadequate environmental assessment has been carried out.

Insufficient Analysis of Alternatives

According to the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC), it is essential to thoroughly analyze and evaluate reasonable alternatives to the proposed action, including different locations and technologies. However, the current proposal falls short in this regard, lacking a comprehensive analysis of alternative locations and technologies. The SEA report predominantly focuses on Area A without providing a detailed comparison with other potential sites such as Areas B, C, and D, nor does it explore alternative renewable energy technologies like offshore floating turbines. This oversight contradicts the SEA Directive's objective to ensure that environmental considerations are fully integrated into the preparation and adoption of plans and programs with significant effects. A more rigorous and transparent examination of alternatives is necessary to comply with the directive's

requirements and to facilitate a more informed and balanced decision-making process. In considering the alternatives in the SEA scoping phase, Table 7.1 refers to different technical mode/ alternatives to achieve the same objectives. Table 7.2 states that the only reasonable, realistic, viable or implementable alternative is fixed foundation turbines in water depths of 70 meters or less. This of course is not true. Floating wind has achieved a TRL of 9 and is ready for commercial deployment. Commercial projects are being developed in South Korea, Scotland, France and the UK amongst others. While this technology is presently more expensive than fixed due to lack of scale, industry has indicated that LCOE will be similar to fixed by 2035. It is shocking that DECC decided in 2022 to ignore a technology that could have given Ireland a significant advantage in developing a means to harness over 85% of our offshore wind resources. It is not acceptable that floating technology is not being considered because of a shore sighted approach to ORE that lacks ambition.

Lack of an Environmental Impact Assessment

According to the European Union's EIA Directive (Directive 2011/92/EU as amended by 2014/52/EU), an Environmental Impact Assessment (EIA) is mandatory for projects likely to have significant environmental effects. Although the draft DMAP is a plan rather than a project, it is our belief that plans designating specific waters for offshore renewable energy development should undergo this crucial assessment to ensure the integrity and transparency of the process. While the Strategic Environmental Assessment (SEA) provides a general overview of environmental considerations, it does not meet the rigorous standards required for an EIA.

A more detailed and comprehensive EIA would include:

- **Site-specific data:** Detailed information about the specific environmental conditions of the proposed site.
- **Baseline environmental conditions:** Comprehensive baseline data to more accurately assess the impacts of future offshore renewable energy activities.
- **Evaluation of alternatives:** Thorough assessment of reasonable alternatives to the proposed site, including their environmental impacts.

The Draft DMAP emphasizes the importance of protecting marine biodiversity and assessing potential impacts on marine ecosystems. However, without a comprehensive EIA, these considerations remain speculative and insufficiently substantiated.

Lack of Visual Impact Assessment

As stated above, the lack of visual impact assessment is alarming. The Department stated that as this is a plan not a project, you cannot provide more detail on what those potential visual impacts may be and that this is because that clarity can only be provided at project level when there will be clarity on windfarm layout, size of particular turbines which can only be provided through an EIA. That is a very poor argument to put forward when visual impact is one of the biggest issues for the affected coastal communities.

Furthermore, the National Marine Planning Framework sets out the key issues for marine planning one which is that the DECC will develop statutory marine planning guidelines to support best practice including the development of a specific visualization assessment in relation to design and layout of proposed developments. Why has this not been carried out?

Landscape/ seascape

The National Marine Planning Framework outlines the following points under Seascape and Landscape Policy 1:

Proposals should demonstrate how the likely significant impacts of a development on the seascape and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference:

- a) avoid,
- b) minimise, or
- c) mitigate significant adverse impacts on the seascape and landscape of the area.
- d) If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding. This policy should be included as part of statutory environmental assessments.

It specifically refers to the European Landscape Convention (2000) and National Landscape Strategy (2015-2025). The Planning and Development (Amendment) Act 2010 specifies that development plans shall contain particular objectives relating to landscape, including objectives in accordance with 'relevant policies or objectives relating to providing a framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention'. The National Landscape Strategy 2015 – 2025 aims to implement the European Landscape Convention (2000) in Ireland by providing for specific measures to promote the protection, management and planning of the landscape. Actions in the Strategy include development of a National Landscape Character Assessment, statutory guidelines on local Landscape Character Assessments and preparation of Landscape Character Assessments at local authority level. Landscape Character Assessment is the process of understanding and documenting the range of factors that contribute to the unique physical identity of a particular geographical area. It acknowledges that distinct areas have different capacities to accommodate change that can impact on that particular landscape character and this is understood as landscape sensitivity.

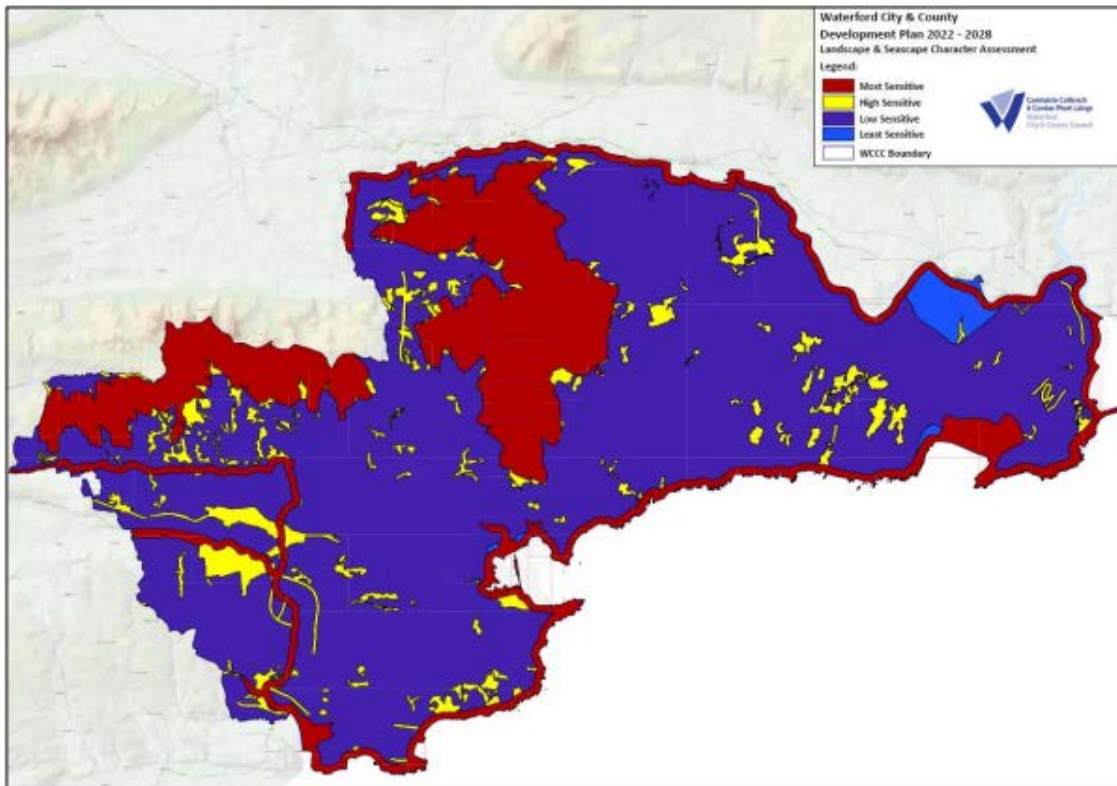
We note that there is reference to the Regional Seascape Character Assessment for Ireland 2020 (Marine Institute, 2020). The study identified gaps in baseline descriptions of seascape character while also contributing to achieving commitments under the European Landscape Convention 1.2(ELC) and Ireland's National Landscape Strategy (NLS) 2015 - 2025. While this is a regional assessment, a more robust Landscape and Seascape Character Assessment is included in the Waterford City and County Development plan 2022 – 2028. The Waterford LCA states 'Skyline ridges, hill and mountain tops, coastlines, promontories, headlands, lake shores and banks of large rivers are all conspicuous features in the landscape. The eye is strongly drawn to such features, principally because strong contrasts of colour and form occur along these lines of contact between the land and the sky or water. New development on or in the vicinity of such natural features has a significant potential to be conspicuous over a wide area. It is accepted that these landscape features have an extremely low potential to absorb new development without causing disproportionate visual impacts'. We would like to draw your attention to the fact that Waterford is the only southern county with a seascape character assessment. While the Marine Institute SCA is a regional level study, the absence of local SCAs, visual resource mapping and lack of a robust review of local SCAs represents a significant data gap which needs to be addressed before any DMAP is approved.

We would also question the approach taken to landscape/ seascape within the DMAP plan. There does not seem to be a standard approach and we would ask the DECC to confirm what guidelines are being used to identify key seascapes and features to inform the SLVIA within the DMAP location process. In the

absence of meaningful government guidelines, it is not acceptable to rely on out of date guidance or best practices from other jurisdictions to consider seascape and landscape in an Irish context. It also may be argued that visual impacts on the coastline will be addressed at project level through an EIA. This is way too late as the DMAP location will constrain any developer to within the boundaries of the DMAP with little scope to mitigate against negative visual impacts on the local seascape and landscape.

We would add the following points on landscape/ seascape:

- Table 5.15 in the SEA report refers to types of Landscape Character Areas/Units in the Onshore Study Area and their Associated Sensitivity. We would question the reclassification of LCAs- to low/medium/high. This was originally carried out to inform the SEA sensitivity mapping webtool but is not accurate. There is no reference to the type of development or activity which the sensitivity mapping is referring to. There is a significant difference between the impacts of aquaculture/ small harbour developments and large ORE developments such as windfarms and associated 300meter+ high turbines.
- We also note there is an inconsistency in identifying landscape and seascape on a national level. This is a significant data gap which must be addressed before any visual impact assessments are undertaken for the south coast DMAP.
- We note at the bottom of Table 5.3.10 Existing Environmental Problems Relevant to the Draft SC-DMAP there is reference to the intensification of coastal and nearshore development and the pressures it places on landscape/ seascape. What mitigation has taken place at strategic environmental assessment level to alleviate these identified pressures?
- We ask that a 22km buffer is applied to any coastal zone which has water depths of 70 meters or below beyond the 22km boundary. This can be reviewed with a view to moving further offshore as technology advances.



Map A8.3. Landscape Sensitivity

Adherence to the National Marine Planning Framework (NMPF)

In May 2021 the Government published the National Marine Planning Framework (NMPF) as a requirement of EU Directive 2014/89/EU; embracing the concept of maritime spatial planning which brings together all marine-based human activities and outlining the Government’s vision, objectives and planning policies for each. The NMPF applies to a maritime area of 495,000km² is considered as the overarching document in relation to marine spatial planning. Considering that any future DMAPS are management plans for specific areas of the ocean or can be used to promote specific activities at sea, any future DMAPS will become part of the NMPF and will, therefore, it is imperative that policies contained within the NMPF are considered by government or public bodies when developing DMAPS.

We note that in section four there are overarching policies applying to all proposals capable of having an impact on the maritime area. These policies must be considered regarding any offshore energy projects in our maritime area. Specifically, projects must demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate significant adverse impacts on the subject matter of the policy. It is also

noted that the seascape/ landscape policy within the NMPF refers to the European Landscape Convention and Ireland's National Landscape Strategy 2015-2025 (NLS) both of which are key in determining how ORE projects will impact our seascapes.

Addressing the seascape, landscape and visual impacts of ORE developments will be the greatest challenge faced by the Irish planning and development processes; although the Minister for Housing might suggest that there are adequate resources and measures in place to guide the planning process with regard to addressing seascape, landscape and visual impacts. It seems there is a lot of work to be done especially when it comes to applying a consistent approach to planning issues. An example of this can be seen in how the County Development Plans for both Waterford and Wexford accord a high degree of sensitivity to their coastal zones including the Hook Peninsula. Waterford also accords a high degree of sensitivity to the Comeragh Uplands.

But there is a lack of consistency between the two County Development Plans. This is unfortunately not surprising because Landscape Character Assessment throughout the 26 Counties has been based on the Draft 2001 Guidelines which were never refined following a consultation process that highlighted many weaknesses at the time and two critical reports commissioned by the Heritage Council in 2006 (Martin & Associates) and 2009 (Minogue & Associates). The EPA Landscape Character Assessment Reframe Study currently in progress has yet to report and will take some time to remedy matters. The planning process addressing landscape/visual impacts has been further weakened by the failure of the Irish State to actively implement the National Landscape Strategy 2015-2025 across all the aims and objectives. It should be noted that the NLS is an action intended to implement the European Landscape Convention 2000 (signed/ratified by Ireland in March 2002).

The state is legally required to ensure that landscape impacts are addressed under its obligations relating to EU Environmental Impact Assessment (EIA) Directives dating back to 1985. Directive 2014/52/EU amends the 2011 codified Directive but does not replace it. It does however provide more clarity regarding landscape and specifically references the Council of Europe Florence European Landscape Convention (ELC) 2000. The fact that the state has failed to provide for adequately addressing landscape/visual impacts arising from development projects places both developers and concerned citizens in an almost impossible position that currently can only be eased by developers or, in this case, the Irish State, going

'the extra mile' to take all necessary steps to minimise and mitigate the landscape/visual impacts of their proposed developments.

We like to draw your attention to the draft Offshore Renewable Energy Development Plan II (ORED II) published earlier in 2023 and the accompanying draft Strategic Environmental Assessment Report with specific reference to landscape management, protection and planning and Ireland's obligations having signed and ratified the European Landscape Convention, Florence 2000 and its legal responsibilities with regard to compliance with the relevant EIA & Strategic Environmental Assessment (SEA) Directives. We would share the aspiration stated on the cover sheet of the consultation process ensure that we do indeed end up with "the right offshore technologies, in the right places". The draft plan and the accompanying SEA might reassure concerned citizens that this admirable aim will be achieved through strategy, research, best practice guidance, design, planning and monitored delivery. BUT there is a problem at the core. The SEA rightly lists landscape as an impact to be considered and assesses that the potential impact will be significantly negative in the absence of mitigation and suggests with mitigation the impact might reduce to 'minor negative'!

The SEA Objective 16 states – "Implement the requirements of the European Landscape Convention through high quality design for sustainable stewardship of Ireland's landscape and by integrating landscape into Ireland's approach to sustainable development". On Pages 111 & 112 the SEA states the following:

Landscape and visual effects to be given due consideration during lower tier (DMAP and/or individual project) assessments and due account should be given to any regulations or guidance on visual assessments by the Minister Housing, Local Government and Heritage [...] Areas included within the environment model should be subject to further, more detailed analysis to understand and appropriately mitigate potential effects in lower tier assessments.

Considering the above there would appear to be a major problem with the SEA and the ORED II Plan which is dependent on the SEA for its credibility.

The European Landscape Convention 2000 (ELC) is identified as the main mechanism to facilitate mitigation. Acknowledging that the National Landscape Strategy 2015-2025 is mentioned in the NMPF, there is no mention of the NLS within the OREDP 11 SEA – which should be delivering on the aims and objectives of the ELC. The problem is that the NLS was not adequately resourced from day one and since 2018 it has stalled with no staff or resources. In the absence of a professional resourced dynamic team the responsible minister – Minister of State for Heritage & Electoral Reform is in no position to offer advice and guidance on how best to mitigate the potential landscape/visual offshore renewable energy developments.

The OREDP II and associated SEA is a high level, national level strategy which seeks to provide a framework within which lower tier assessments may subsequently address site or project-specific details. The National Landscape Strategy 2015-2025 is also a high level, national level strategy. Both will be required to inform any Environmental Impact Assessment (EIA) under the EIA Directive (2014/52/EU) and therefore must be resourced and implemented in parallel, otherwise as a matter of good, honest, integrated governance it is difficult to see how OREDP II can be used as a guiding plan for ORE. To further complicate the issue, the Policy Statement on the Framework for Phase Two Offshore Wind (March 2023) makes no reference to OREDP 11 in the context of the South Coast DMAP or any phase 2 development so it is not clear what plans or policies will inform the designation process.

We acknowledge that an issue for marine planning is the protection of views and impacts on the seascape/ landscape and siting ORE developments in the most appropriate locations. We would suggest that the Regional Seascape Character Assessment undertaken by the Marine Institute in 2020 can only be considered as a baseline study and can no way be used as an instrument to assess the impacts of ORE developments off our coast. We would therefore ask that the Dept of the Environment, Climate and Communications (DECC) take account of both the National Landscape Strategy 2015-2025 and the Council of Europe Florence European Landscape Convention 2000 during their site selections within the South Coast DMAP.

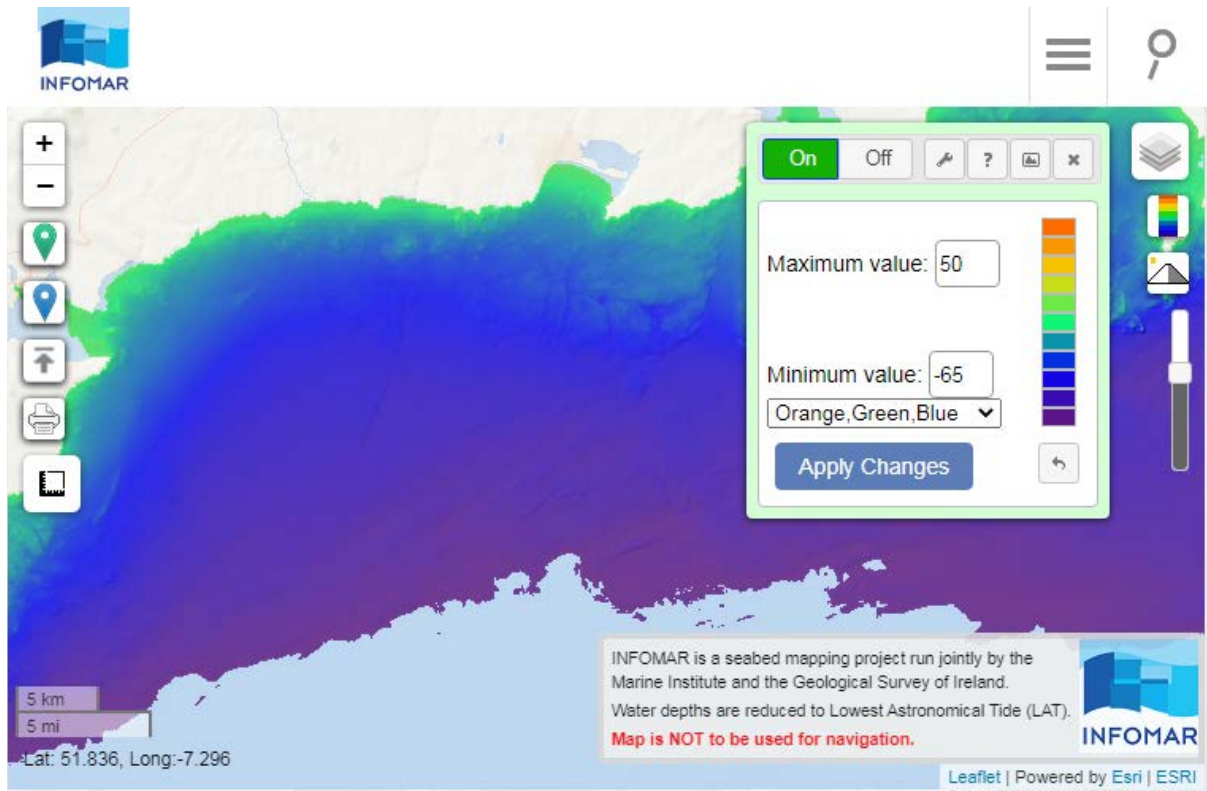
Water depths

The SC DMAP report states how area A has a minimum water depth of 48 m and a maximum water depth of 69 m, giving an overall range of 21 m. This is very similar to the Energia North Celtic Sea Wind Project scoping report which reported depths of between 46 and 68 meters. We note that modern construction techniques are allowing fixed foundations to be constructed in up to 75 meters of water in sea areas where significant wave heights can reach close to 10 meters. Although higher waves have been reported off the south coast of Ireland, there is no reason why fixed foundations cannot be installed in water up to 70 meters. It has been confirmed during the consultation events that any development at site A will be the 'deepest windfarm in the world' and acknowledging that the current deepest foundation is in 59 meters (Seagreen) we will be 'really pushing the boundaries at 10 meters deeper'. Blue Horizon are pleased that DECC has acknowledged that it is possible to install fixed foundations in 70 meters of water. This begs the question as to why Site A is so close to shore and full of technical constraints.

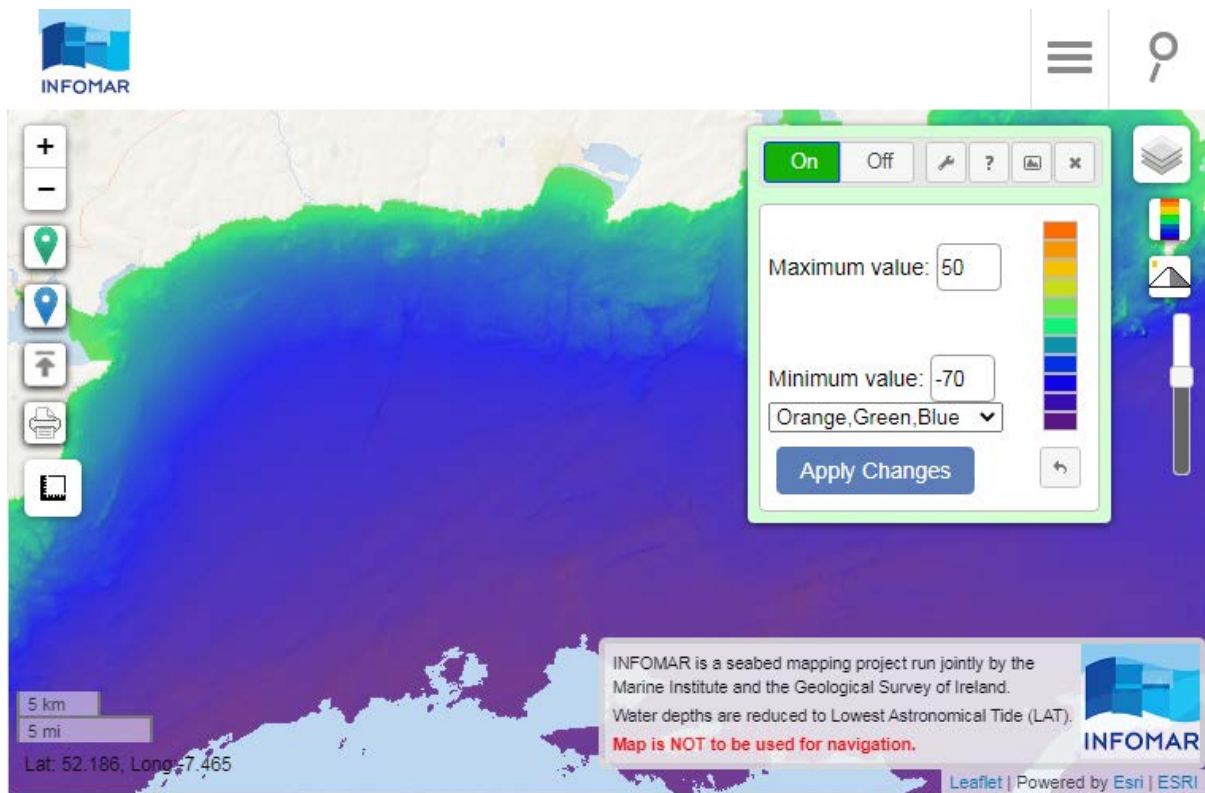
The following images from INFOMAR website illustrate water depths at 65 and 75 meters just off the south coast. We note that there is a considerable area of seabed available at or less than 70 meters up to 25 – 30 km offshore. We acknowledge that placing fixed foundations in this depth will 'really push the boundaries' but, if 75 meters depths can be achieved in Scotland and delivering power by 2030, well why not here? We again request that the minimum distance of any ORE infrastructure is 22km from the coast.

Area B,C and D

We acknowledge that areas B,C and D have been placed on the back burner until sometime beyond 2030 and will possibly never happen. We would note that Area B has been selected as a possible development area by SSE. Water depths average at 71 meters and minimum depths are 66 meters. This would suggest that there is plenty of scope to build a 900mw wind farm in the more northern portion of this site. SSE have already acknowledged that they have the technical wherewithal to develop a fixed foundation windfarm on this site. Cable runs to shore are not an issue considering that the Seagreen export cables are between 27 and 30 km in length carrying HVAC to onshore substations along the Scottish coast. There is no reason why a 900 mw windfarm cannot be developed at this site.



And 70 meters...



Public and Stakeholder Engagement

Public consultation and stakeholder engagement are integral components of the EIA process, as emphasized by the Aarhus Convention and integrated into EU law through the EIA Directive. Article 6 of the Directive ensures that the public is given an early and effective opportunity to express their opinions on the draft plan and the accompanying environmental report before the adoption of the plan. The current DMAP consultation process, without a comprehensive EIA, lacks the necessary depth and detail to facilitate meaningful public participation. An EIA would provide a structured framework for addressing public concerns, ensuring transparency, and fostering trust in the decision-making process.

This is particularly important for projects with high public interest and potential **for social conflict**.

Public opinion

As part of our awareness campaign, and as mentioned above, we undertook a survey of the Waterford public. In addition to the findings mentioned above, the survey also highlights that

- 81% of respondents do not believe the Irish Government will protect our environment from inappropriate wind farm development
- over 75% of respondents stated that it was very important that the most up to date technology is being used in the deployment of offshore wind farms off the Waterford coast
- Over 68% of respondents stated that they were willing to pay more for renewable electricity to ensure wind farms are located **at least 22km from shore**.

In addition to undertaking our survey, we encouraged the Waterford public to express their own views on the draft south coast DMAP given the importance of this matter. We understand that there has been a very significant response from the Waterford public (over 1,250 individual submissions) requesting that wind farms **be located at least 22km from shore**.

Proposed Alternative Solutions to Using Site A for Offshore Wind Farm Development

The Draft South Coast Designated Maritime Area Plan (DMAP) currently favours Site A for the development of offshore wind farms. However, given the significant environmental, legal, and procedural concerns associated with this site, it is prudent to consider alternative solutions that align better with EU environmental directives and principles. Here are some proposed alternatives:

Alternative Sites (B, C, and D): The SEA report's heat maps and environmental constraints analysis identify several alternative areas, namely Sites B, C, and D, which present lower environmental constraints compared to Site A. These areas have fewer interactions with protected marine and bird habitats, making them more suitable from an ecological standpoint.

- **Environmental Suitability:** These sites are situated further from designated Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), reducing the risk of disturbance to sensitive species and habitats.
- **Technical Feasibility:** The SEA report's technical exclusions map indicates that these sites are feasible for wind farm development, with suitable water depths and seabed conditions for turbine installation.

Use of Floating Wind Turbines: Floating wind turbines are an emerging technology that allows for wind farms to be situated further offshore, where environmental and visual impacts are minimized.

- **Reduced Visual Impact:** Floating wind turbines can be placed beyond the horizon line, significantly reducing their visual intrusion on coastal landscapes.
- **Minimized Ecological Disruption:** Being located farther offshore, these turbines are less likely to interfere with nearshore marine ecosystems and bird habitats.

Phased Approach: Instead of a full-scale immediate development, a phased or incremental approach to wind farm development could be adopted.

- **Initial Small-Scale Projects:** Begin with smaller pilot projects to gather more data on environmental impacts, particularly in less sensitive areas.
- **Comprehensive Monitoring:** Implement robust monitoring systems to assess real-time impacts on marine biodiversity, water quality, and seabed integrity. This data can inform subsequent phases of development, ensuring adaptive management practices.

Inclusive Planning Process: A more inclusive and transparent planning process involving local communities, environmental NGOs, and other stakeholders can lead to more acceptable and sustainable solutions.

- **Public Consultation:** Conduct thorough public consultations to gather input and actually address concerns from all concerned parties.
- **Collaborative Decision-Making:** Establish collaborative platforms where stakeholders, including members of the public, can contribute to the decision-making process, ensuring that the chosen sites and technologies reflect a consensus-based approach.

Two 450MW Wind Farms: Instead of developing a single 900MW wind farm in Site A, consider building two 450MW wind farms in separate locations. This could involve placing one farm in the southern area of Site A (22km from shore) and another in a suitable location within Sites B, C, or D.

- **Balanced Environmental Impact:** Distributing the capacity across two locations would spread the environmental impact, reducing the stress on any single area.
- **Operational Flexibility:** Smaller, separate farms could offer more flexibility in operation and maintenance, potentially enhancing reliability and resilience against environmental disruptions.

Relocating Site A: Another option would be to move Site A further south (22km from shore), away from the most sensitive marine and coastal habitats.

- **Reduced Proximity to Protected Areas:** Shifting Site A southwards would place it further from the SPAs and SACs, thereby minimizing the potential for habitat disruption and species disturbance.
- **Improved Stakeholder Acceptance:** Relocating the site could address some of the visual and ecological concerns raised by local communities and environmental groups, leading to broader support for the project.

By exploring these alternative solutions—lower impact zones, offshore floating wind turbines, a phased approach to development, enhanced public participation, splitting the development into smaller projects, and relocating Site A further south—the DMAP can align better with the principles of the Marine Strategy Framework Directive (Directive 2008/56/EC) and achieve a more balanced, sustainable development of offshore wind energy. These alternatives not only mitigate environmental impacts but also enhance legal compliance and public acceptance. Implementing these strategies will help ensure that the development of offshore wind farms is both ecologically responsible and socially equitable.

Furthermore, by adopting these alternatives, the likelihood of legal action against the development would be reduced. Failure to comply with EU directives, such as the Marine Strategy Framework Directive and the SEA Directive, could result in legal challenges based on non-compliance with environmental laws. Potential legal actions could include infringement proceedings initiated by the European Commission, judicial reviews by environmental NGOs or local stakeholders, and challenges based on violations of the Habitats Directive (Directive 92/43/EEC) and the Birds Directive (Directive 2009/147/EC). Addressing these legal risks proactively by considering alternative solutions will ensure a smoother and more legally sound path forward for offshore wind development in the South Coast DMAP.

Moreover, adopting these alternatives would likely increase the feasibility of delivering the projects on time and ensure that there are no further delays in their implementation. By ensuring comprehensive environmental assessments and securing broad stakeholder support, the projects can proceed more smoothly through the regulatory and planning processes, thus enhancing the likelihood of timely and successful completion.

Conflict of interest

We have noted that RPS have compiled a significant portion of the reports associated with the draft south coast DMAP. We also note that RPS represented Energia and their North Celtic Sea Wind Project and authored the associated EIA scoping report in May 2023. If RPS has represented Energia as a consultant and now works for the DECC in compiling the key reports and consultation findings, it would appear that a conflict of interest may arise in the event that Energia, or companies associated with Energia, take part in any ORESS auctions associated with the broad south coast DMAP, site A or any site in the near vicinity.

Conclusion

In conclusion, while the development of renewable energy infrastructure is critical for achieving climate goals, it must not come at the expense of environmental integrity and visual landscape quality. This proposal urges the government to reconsider the selection of Area A for the wind farm development, advocating for alternative locations that present fewer environmental and visual impacts. Such a decision would demonstrate a commitment to sustainable development principles and compliance with European environmental legislation. The careful selection of wind farm sites is crucial for balancing energy needs with the protection of our environment and our natural and cultural heritage.

On behalf of Waterford's Blue Horizon

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Directors

14th June 2024