

Coastwatch submission On the South Coast DMAP Proposals

Prepared by [REDACTED]

Date: October 10th 2023

EMAIL SUBMISSION to "southcoastdmap@decc.gov.ie" southcoastdmap@DECC.gov.ie

Summary

This submission focusses on the current South Coast DMAP proposal which we see as a pilot from which we can learn when developing further DMAPs.

We welcome the move from developer led to State led approach on Offshore Wind Development (OWD). For the State led approach to adequately address the many challenges faced by Ireland, a new interdisciplinary approach, with adequately resourced team and full transparency of approach, are required.

We would like to raise a number of concerns with the first DMAP proposal:

1. Timing;
2. Public Information and Participation in the first DMAP proposal;
3. Integration of Biodiversity goals and objectives.

We believe that these core points must be addressed in planning future DMAPs and warn that the current South coast DMAP proposal will require significant work to retrofit this information into a useful draft DMAP.

Introduction

We fully agree with the **concept of** a State led approach to managing activities in our last great commons. Sea life produces most of the oxygen we breath and the blue carbon stored in our oceans is vast. Human activities and greed have led us to harvest and use many resources unsustainably. Ireland is among one of the EU's largest countries when our marine territory is also considered. Therefore, we have a huge moral responsibility for the stewardship of this area not just in the context of the European Union, but in a planetary context. Adding offshore wind (and other energy infrastructure) to the activities to be managed means we need to plan much better, be much wiser, do much better risk assessments, monitor and control much better to avoid further deterioration.

Government has our mandate to lead the way, delivering on all 17 Sustainable Development Goals (SDGs), Biodiversity strategy and EU Nature laws. We appreciate that it is exceptionally difficult to do that and create a whole new energy sector. That is why the State led approach must be adequately resourced, with interdisciplinary teams of staff, working with the public to achieving a **complete** ecosystem-based approach to Marine Spatial Planning.

We acknowledge that the State is making an effort to introduce informed public participation with the Public Participation Statement and also providing workshops and joint public meetings with EirGrid and DECC DMAP displays as experienced in Kilmore Quay.

1. Timing

The DMAP proposal was published in August 2023 after a bewildering set of overlapping OWD exploration applications had already been lodged (see Figure 1 below) and some granted. This is before the designation of MPAs or even publication of the MPA bill to start the process. The reversed time order has resulted in impactful exploration where no license is likely to be granted. An unnecessary assault on our marine ecosystems.

The current development of the Southern DMAP is incredibly fast, while the MPA bill is progressing slower than expected.

The indicative timescale shared by Government in workshops (see Figure 1, below) foresees publication of the DRAFT DMAP, SEA and AAs next month and statutory consultation on that draft running in November and December 2023. This provides inadequate time for the public to consider and participate in these processes, while legal nature protection won't catch up with development plans.



Figure 1: Timing of DMAP Processes

Recommendations:

1. Add a time and action planned framing note to the Draft DMAP when it is being published so the public are aware of the timeframes for public participation.
2. Review and extend the time scale for public consultation considering the asks we have set out in our submission below.
3. Either wait until MPA bill has been passed and MPAs in this area identified or at a minimum take a precautionary approach when drawing up the DMAP proposal omitting Fair Seas Areas of interest and known feeding, migrating and breeding areas.

2. Public Information

2.1 The high-water mark and the 80m depth contour

When introducing the DMAP proposal to the public, a blank DMAP proposal area is shown and explained as running from the high-water mark to the 80m depth contour. In public displays and webinars, we are told that the basis of the map is a good wind area where fixed offshore wind could be positioned or will, soon as the technology has sufficiently advanced. While wind turbines would hardly sit at high water mark, we believe the landward limit is useful and should include the seashore (as defined in the Foreshore Act) to cater for cable landfall points.

The challenges arise when we examine the applications submitted so far in this area. When mapped (see figure 2 below) we see that several applications go well beyond the 80 m depth contour off the Cork coast, while off Wexford/Waterford there is no applicant interest to go out anywhere near the 80m depth.

We are also told without adequate reasons that the DMAP is for fixed base turbines only. Why has the State decided not to consider the floating OW applications when these are being developed and going into operation now in several countries?

Recommendations:

4. Widen the scope for public participation. Explain the DMAP area – why does it end at high water and why does the area differ from the area covered by current applications and why floating is not considered.

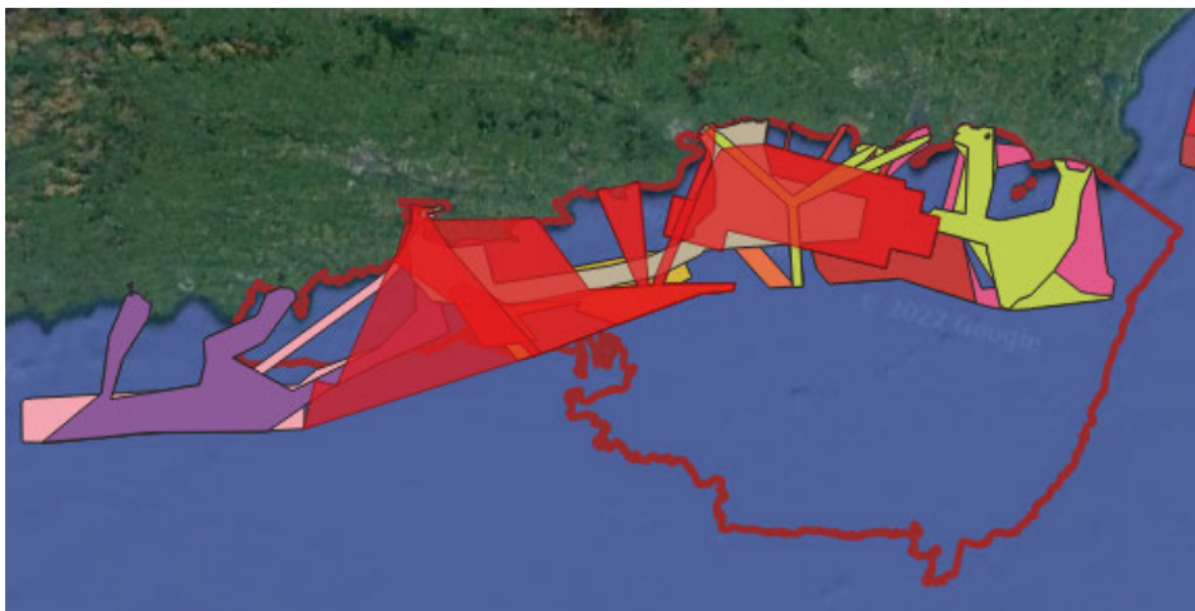


Figure 2: Applications for offshore wind development in the DMAP proposal area (Map by Dr Owen Clarkin).

2.2 Public participation - but only in a selection of decisions

The offshore wind capacity to be brought into the grid is well explained and set out. One map also shows the locations of the EirGrid foreshore license applications.

The choice that the public has to make is: either one big offshore farm or 2 smaller ones. The average interested citizen who wants to participate would have no idea what the benefits or drawbacks of one larger or 2 or indeed 3 smaller ones would be. What does it mean for nature, for square meters dredged, for landfall lines and maintenance vessel traffic and noise? Unless that is known, we cannot talk about informed public participation.

2.3 Incorrect and missing information and responsiveness

The interconnectors are shown on the published DMAP proposal. The 'Green line' is shown running through the coastal zone of county Waterford and over to Great Island SSE station in county Wexford. In reality, the landfall is at Baginbun in Co Wexford and then runs due north. Such position mistakes are significant for local people and should be simple enough to correct online once pointed out. The public should feel that they are genuinely participating and contributing. If the incorrect route remains, then mistrust sets in in the wider information provided.

Recommendations:

5. Design future DMAP proposals to be more responsive to public edit comment. Update to correct information where needed, acknowledge contributions and keep old versions accessible online.

2.4 Inclusion of essential ancillary works

There is a lack of information about developments beyond the wind turbines which are essential to the OW project. Which ports need to be enlarged or dredged more often or deeper? How many maintenance vessels are required, what are their characteristics and what do they need? As there are several port development plans and applications in hand, even a reference to these and a promise that they will be presented in more detail at the Draft DMAP stage would be useful.

This is the area where the maximum gain in nature protection and avoidance of damage can be made. It needs to be included and the concern about project splitting avoided.

Recommendations:

6. Provide sufficient correct information on essential ancillary development to ensure that there can be informed public participation and implications of choices are really understood.
7. Consider essential and likely port development for the construction, servicing and decommissioning as part of the draft DMAP to be published.

3. Integrating Biodiversity Goals and objectives

3.1 A DMAP which does not consider key biodiversity data

In Ireland, 23 out of 24 breeding seabird species are assessed as either Red or Amber List [Birds of Conservation Concern \(2020-2026\)](#). It is baffling to then see their core feeding and breeding sites included in a state led offshore wind DMAP proposal. There is insufficient information provided to the public on the ecological considerations for the proposed DMAP site, in fact, any ecological considerations appear to be completely absent from the DMAP area decision.

Upwellings which are feeding hotspots for cetaceans and birds are not drawn in on the explanatory DMAP illustrations. Bird migratory routes are not shown. These areas might not be fully known, but just as for fish spawning grounds, there is reasonable enough evidence from government supported research programmes (*e.g.*, ObSERVE, for bird & cetacean data) to draw up and consider indicative maps from the start of the DMAP design. When we asked in public information events why this key information was not shown, we were assured it would be taken into account later.

While the ecosystem approach is referred to repeatedly, the 'evidence base' does not provide clear ecosystem-based reasoning for the current DMAP site location.

3.2 Fair Seas Areas of Interest

The Southern DMAP proposal overlaps with 2 Fair Seas 'Areas of interest' – see Figure 3(a) from Fair Seas and as overlay onto the DMAP proposal in Figure 3(b). These areas were distilled by eNGO scientists from a large amount of published biodiversity data and represent areas of highest biodiversity value and hence potential for designation as Marine Protected Areas.

Ireland has committed to protecting 30% of its seas by 2030 and we hope that the EU Biodiversity Strategy of 10% strict protection will also be met. While we are still waiting for the MPA bill to be published it would be signal that there is meaningful public participation if the Fair Seas scientific review

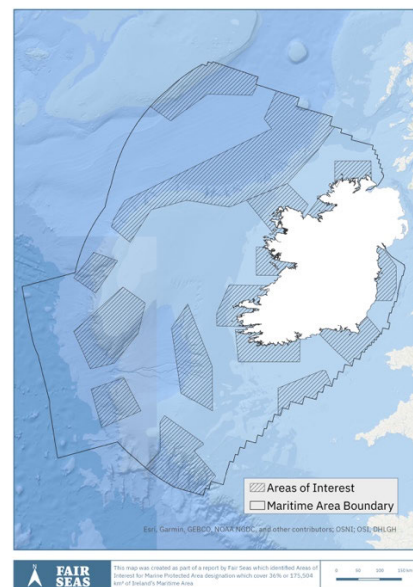


Figure 3(a): Fair Seas Areas of Interest (EEZ Scale)



work carried out to support government in its MPA designation endeavours was taken into account.

Figure 3(b): Fair Seas Areas of Interest overlap with the proposed DMAP ([REDACTED]).

3.3 Exploitable biodiversity

We welcome that some areas key to the fishing sector are included in the DMAP proposal consultation maps and displays. We caution that the fish spawning sites shown are only for some commercially important species. They just give a flavour and do not include many keystone ecosystem species like sprat.

3.4 Productivity

If an ecosystem-based approach is used as set out in the DMAP information, then we should get a good insight into where the most productive areas are. Below in Figure 4 we superimposed the Chlorophyll α levels on the DMAP proposal. Chlorophyll α equates to phytoplankton hotspots as ecosystem engines. The map shows the highest phytoplankton concentrations in red-orange-yellow are close to the shore where warm water, upwellings and nutrients facilitate growth. Plankton in turn is 'converted' to macro invertebrates and fish like sprat and sandeel which are consumed by larger fish and ocean giants like the basking sharks found in this DMAP proposal. There is ongoing research into how large-scale offshore wind farms may interfere with current wind, current and plankton production. We do not have a definitive answer, but if we use the precautionary approach, we would stay out of this highest productivity zone. Looking back to Figure 2, we can see that the applications hug this zone. The MSP Directive explicitly indicates the requirement to consider land-sea interactions. Such requirements do not appear to have been given due regard in the DMAP consultation.

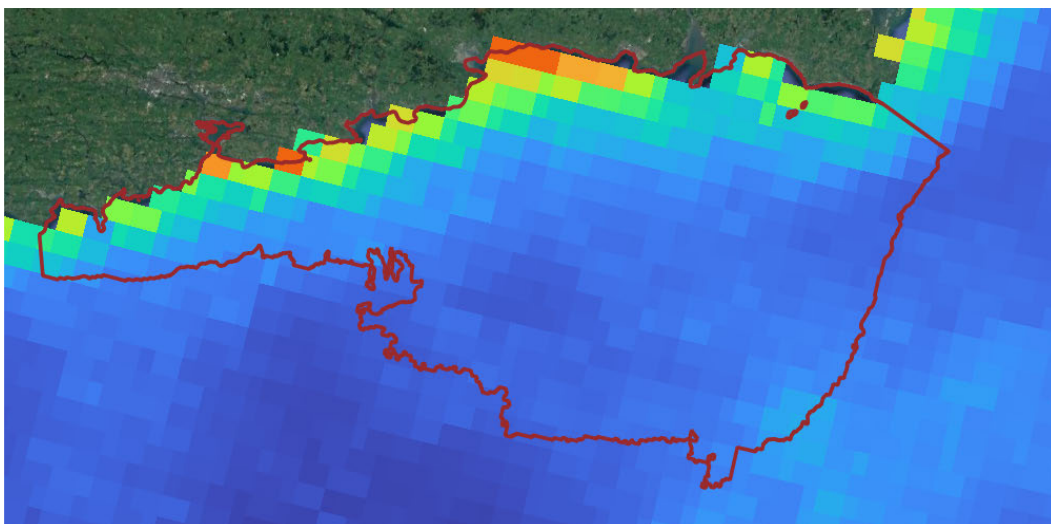


Figure 4: Mean Chlorophyll α Data overlaid with South Coast DMAP Area (UN Ocean Data, 2015, [REDACTED]).

From DMAP proposal area to Draft DMAP:

Given the above considerations we would see the Southern DMAP proposal radically reduce in size and location when republished as Draft DMAP. The draft DMAP area should be more than 20 km offshore to avoid the most productive inshore areas and concentrating on the

centre of the current DMAP proposal area, away from Natura 2000 sites, core feeding and breeding areas which have been incorporated into the two Fair Seas Areas of Interest.

Recommendations:

8. The DMAP design process should be reformed now to include biodiversity and ocean restoration goals in the DMAP objectives. It may be achieved by an umbrella Southern DMAP to achieve climate and biodiversity goals . Under the umbrella one subDMAP for offshore wind focusses on developing marine green energy and ancillary needs, while another focusses on protecting, monitoring and enhancing biodiverse, blue carbon habitats like mussel, kelp and seagrass beds as well as all relevant existing biodiversity protection and restoration goals. The two dove tailed sub DMAPS would advance and be reported on together.
9. The DECC teams working on OW should have wider Terms of Reference (TOR) and have in-house marine ecologists. This is urgently needed so that they can deliver for OW, biodiversity and MSFD goals. Additionally, they must be given support to work as an interdisciplinary team with key staff spread over different government departments. The COVID pandemic has demonstrated how well we can work across departments when it matters.
10. The Minister’s MSP Advisory group should be reconvened to support ongoing input and better understanding from a range of stakeholders. It is essential that our Marine Spatial Planning (MSP) efforts are integrated with our nature restoration and protection goals.
11. Public Participation is one of the real positives in the design of the DMAP process. But adequate resources for environmental groups, communities, and other sea users in the DMAP area such as inshore fishermen need to be provided so that they can fully participate and bring their local knowledge and experience to the table with highest Aarhus Convention ambitions.
12. Implement the suite of public funding recommendations as set out in the [Citizen Assembly on Biodiversity Loss 2023 report](#) . Recommendations 32 to 42, 132 and 147 are most relevant here.

Recommendations (Southern DMAP specific):

13. Add all ancillary development and maintenance works/options, especially port development and dredging requirements to the draft DMAP and SEA/AA.
14. When drafting the proposal location, the following areas should be avoided, at least until 2030 and then reviewed:
 - Phytoplankton and biodiversity hotspots including seagrass beds;
 - Natura 2000 sites and connectivity with them;
 - Seabird feeding areas and migratory routes, on which the coastal and marine SPAs depend;
 - The Fair Seas Areas of Interest (until 2030 or longer if the 30% MPAs have not been achieved by then).
15. All environmental data should be made publicly available in a usable format in order to ensure meaningful official and public participation. Given the number of OW applications submitted to government for the Southern DMAP proposal area, it is likely that there is significant recent survey data.

Conclusion

To conclude, we see the present DMAP approach as suffering from a biodiversity bypass which is not site specific but a systematic fundamental flaw in design of DMAPs. A recent Southern DMAP information webinar encapsulated the approach. Mark Willis pointed out that the DMAP objective was to address the Energy and Climate crises. The dual Climate and Biodiversity crises which the Dáil voted to address in 2019 wasn't mentioned.

We believe that the energy crisis is exasperated by the rapid expansion of data centres and that focussing on providing more energy by hasty DMAP and OW development is high risk. A precautionary approach would have prioritised recovery of biodiversity and blue carbon features. It would see MPA legislation, new MPA designation and site management/restoration of our existing Natura 2000 network get all the attention they need and be in place as safety frame for wise OW development.

Government must lead by example in the interest of its people, its nature and natural resources. We believe the State must demonstrate an integrated transparent approach, tackling both the climate and biodiversity crises in planning future sea use.

Achieving this means changing Terms of Reference and allocating more staff to MSP and the OW units in the Department of the Environment and Department of Housing.

The Maritime Spatial Planning Act 2021 which set up the DMAP process contained a strong commitment to public participation. While it is laudable that public participation is so deeply anchored in the DMAP process, eNGOs and others struggle to find the time and expertise to participate. In line with previous Environmental Pillar submissions and the recent research and recommendations produced by the Friends of the Earth-led coalition of eNGOs and offshore wind operators, better supports are required.