



Irish Wildlife Trust

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Registered Charity (CRA) Number: 20010966

October 5th 2023

Re: Public Consultation on South Coast DMAP

Do you agree that the development of Offshore Renewable Energy within the geographical area of the South Coast DMAP Proposal will deliver positive local economic, social, or environmental benefits?

Environmental benefits cannot be assumed in regards to ORE. Changing the environment with infrastructure will have knock on effects to the habitats and species which reside there. If ORE infrastructure is not placed in a suitable area then the environmental effects will certainly be more negative than positive. We can not ignore the possible detrimental effects to biodiversity and look only at the positive environmental effects in regards to cleaner energy than the fossil fuel. Environmental benefits should be looked at in each area and considered against the environmental benefits in that area if no ORE infrastructure was placed there.

However, the IWT supports the state governed plan led approach rather than the developer led approach as this could assist with ensuring environmental protection within the decision making process.

We also welcome the mention of the ecosystem based approach in regards to planning 'The establishment of DMAPs will take place according to an ecosystem-based approach, with full consideration for the protection of marine environment and biodiversity.' This will be vital, along with thorough environmental assessments, to ensure that any environmental damage is kept to a minimum. Offshore Renewable Energy infrastructure and Marine Protected Areas (MPAs) must also be worked on in parallel and potential areas for future MPA designations must be considered when refining the DMAP further.

While there is potential for social and economic benefits, effective stakeholder engagement is essential in the process and the needs of people in the area must be incorporated into any future ORE development plans. ORE development within an area does not guarantee alternative employment opportunities in the area and local stakeholders should be aware of this. Principled stakeholder engagement should be transparent and inclusive to all industries, groups and backgrounds.

Do you have any specific points you wish to raise regarding the development of offshore renewable energy within the geographical area of the South Coast DMAP Proposal?

The geographical area of the South Coast DMAP proposal encompasses (or runs the border of) several EU protected areas (Special Protected Areas under the Birds Directive and Special Areas of Conservation under the Habitats Directives) including the Saltee Islands SPA, Old Head of Kinsale SPA, Sovereign Islands SPA, Ballycotton Bay SPA, Ballymacoda Bay SPA, Dungarvan Harbour SPA, Keeragh Islands SPA, Saltee Islands SAC and Hook Head SAC to name a few. These areas need to be taken into account due to the species and habitats they are designated to protect. There should also be a buffer zone around these areas as migrating bird species use this area all year round. The area must also take into account future protected area designations at a National and EU level. Early identification of these areas will help to avoid costly delays to projects as well as limit any environmental damage. We note that the DMAP report states that further identification of potential ORE development areas within the DMAP will 'be informed by environmental and biodiversity data, as well as existing and potential future EU and nationally designated protected sites.'

Do you consider that some marine areas within the South Coast DMAP Proposal are particularly suitable or alternatively are unsuitable for offshore renewable energy development?

And why

Yes. Many EU protected sites are contained within the DMAP proposal and these are unsuitable for ORE development. Buffer zones around these areas taking into account migratory routes of different seabirds must also be excluded from future developments as well as areas that these species use to forage. Allowing any protected area to be within a considered area for ORE development, shows a lack of ambition in adhering to environmental considerations.

Any other comments relating to the development of this South Coast DMAP?

We believe that there should be more government resources allocated to ensure the environmental aspects of any DMAP are effectively looked at, analysed and considered. eNGO's should also be sufficiently resourced to ensure that experts in these areas have the capacity to reply to consultations. Lack of resources is a major factor in the eNGO sector. Without input from these organisations, which are made up of scientists, environmentalists and people with expertise in the specific species and habitats which could be affected by industry, public consultations are not sufficiently undertaken.