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Registered Charity (CRA) Number: 20010966

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Re: Draft South Coast Designated Maritime Area Plan for Offshore Renewable Energy

Identifying Maritime Areas for offshore wind development - Government has used an ecosystem-based approach to identify four Maritime Areas within which fixed offshore wind farms may be located in the draft SCDMAP area. This involves making spatial and policy assessments based on environmental, social and economic data and information, and integrating the views of stakeholders and the public throughout the process

1. Do you agree with the four maritime areas identified for future offshore wind development in the draft SC-DMAP? If not, why?

The Irish Wildlife Trust welcomes that the ecosystems-based approach has been used when designating the four maritime areas. *'The ecosystem-based approach is intended to ensure that the establishment of DMAPs and identification of maritime areas for future offshore wind development takes place with full consideration for potential impacts, including other maritime activities, and the protection of the marine environment and biodiversity, and will provide opportunities for comprehensive public engagement.'* It is encouraging to see that the areas selected for this DMAP are not within any existing protected areas and also allow for a buffer zone around the latest Special Protection Area (SPA), 'Seas off Wexford'. We also welcome the acknowledgement of future protected area designations within the document, *'A further objective in the preparation of the draft SC-DMAP, has been to avoid potential adverse impacts on biodiversity, EU protected sites, and future national protected site designations.'* Future developments within the DMAP and policy objectives which must be adhered to by developers included provisions regarding the protection of biodiversity and the marine environment as well as noting that there will be further implementation and monitoring of the plan to minimise future adverse impacts along with the point that the scale, location and timing of future developments will be informed by the best available data. We would like to ensure that future monitoring is targeted towards species most likely to be affected and that aspects of their physiological mechanisms and behavioural responses are analysed in depth to ensure no negative impacts are occurring.

The environmental constraints analysis occurred before a technical restraints analysis which we also welcome and previously requested in other consultations in regards to ORE developments and planning.

Sustainable development and environmental protection - The draft SC-DMAP will provide for the sustainable development of offshore wind through consideration of environmental protection, while maintaining, and where possible, enhancing marine biodiversity. A governance structure will oversee and monitor the implementation of the draft SC-DMAP including environmental impacts. Building upon and informing national, regional and local land and marine planning policy, policy objectives set out in the draft SC-DMAP will inform future decisions and assessments by relevant competent authorities on proposed offshore renewable energy projects and their enabling infrastructure, including for electricity transmission offshore and onshore

2. Do you agree that the draft SC-DMAP policy objectives and governance approach, including for environmental protection, will support and guide its sustainable and coherent implementation?

Recognising the need to assess all cumulative impacts of future developments as well as all developments being subject to full environmental assessment through existing statutory guidelines is welcome. In some cases these guidelines could be expanded upon in light of new knowledge and best international practice which should be adhered to. Ireland unfortunately has a history of failing to comply with certain objectives within existing statutory guidelines which we hope will be resolved. It states that there 'may' be modeling to assess impacts on migratory and foraging patterns of marine mammals, fish and birds but we believe that this is something which is essential. Regional level surveys within the DMAP to establish scale and location of projects is something we agree is necessary. In previous consultations (such as the OREDP II) regional level data wasn't always accounted for so this is a welcome addition. Acknowledging the *evolution of baselines* and additional national and EU level protected sites is also welcomed.

The SC-DMAP Implementation Programme Board will be further supported in its work by a Marine Ecosystems and Ornithology Working Group and we believe it is important that there is NGO representation from different organisations in this working group.

It is encouraging to see that '*as part of the implementation and monitoring of the SC-DMAP, DECC will also fund the Marine Institute to develop a monitoring and research programme within the SC-DMAP area, in order to monitor whether there are changes to the marine ecosystem following the development of ORE.*' However, it then states that it will look at underwater ecosystems and interactions with fish species/stocks. To fully monitor the impacts of ORE, the research should encompass as much of the marine environment as possible and not only focus on commercial fish species. It is still encouraging to see the ambition for collecting a long term data set and clarification on the scope of this project is needed. Marine renewables should help to improve marine biodiversity wherever possible and the project specific *Nature Enhancement and Rehabilitation Plan* to not only mitigate but enhance and help recover the marine environment is very much welcomed.

Promoting shared use of the sea - The draft SC-DMAP ecosystem-based approach aims to maximise opportunities for coexistence between offshore renewable energy and other marine users and activities such as aquaculture, commercial fishing and seafood activity, and tourism and recreation, as well as the protection of the marine environment and biodiversity.

The establishment of the SCDMAP is not a shortcut in the consenting process. Individuals and communities will still be in a position to fully participate in the planning process and to scrutinise and make submissions on any proposed ORE development in the SC-DMAP area as part of that process.

3. Do you agree that the draft SC-DMAP includes sufficient provisions for co-existence between offshore renewable energy and other maritime activities?

The areas designated within this DMAP avoid current protected areas and we would like to see this as the precedent for future DMAPs and developments. While coexistence can occur between ORE and other maritime activities, environmental and biodiversity concerns should take precedence. We must reach 30% MPA cover in Irish waters by 2030 and so protected area designation must be progressed alongside ORE DMAPs. It must also be ensured that MPAs are placed in the best areas for the environment and that DMAPs avoid these areas while continuing the use of the environmental constraints analysis. A cross department approach in government will be needed to help ensure this.

It has been noted that the four areas which have been selected overlap with spawning and nursery grounds of commercially valuable fish. It has also been stated that ongoing monitoring and data collection of this will occur which is welcomed, as these fish are not only commercially valuable but important components of the marine food web. The negative impacts of this overlap will need to be continuously monitored and mitigated.

Continued engagement and participation with the fishing community has been mentioned and we hope that there is fair representation from smaller fishing communities who may not have the resources available to them to attend meetings etc. ORE developments may cause the displacement of fisheries and there will be a drastic increase in the conflict potential, especially in regards to bottom trawling, as ORE developments accelerate. While ORE developments may prevent bottom trawling in areas, it must be ensured that this fishing practice does not then increase in intensity in protected areas or areas of high biodiversity or environmental importance. Ensuring ORE developments are not within protected areas is essential and we welcome the fact that this DMAP has adhered to that, but we must also ensure that other environmentally damaging activities are not then displaced to these areas. This should be considered in any Fisheries Management and Mitigation Strategy and all relevant stakeholders should be consulted including NGO's.

Maximising benefits for all - Independent economic analysis highlights that implementation of the draft SC-DMAP could generate significant economic and societal opportunities in Ireland, through inward investment and employment creation. majority of these benefits will be captured at regional and local level along the south

4. Do you agree that the plan-led framework set out in the draft SC-DMAP will effectively support and drive economic and employment opportunities, including opportunities along the south coast?

Our main focus as an environmental group advocating for nature is to ensure that environmental considerations are at the forefront of every decision when it comes to selecting DMAPs and future developments within them. Without a healthy and thriving marine environment we cannot achieve meaningful action when it comes to tackling the biodiversity and climate crisis. Without tackling these crises, we not only risk the health of the environment but also the economy at a local, regional and national level.

There has been a lengthy and thorough public consultation process since summer 2023 which we welcome and hope that this continues. We also welcome the policy objective stating that *'holders of a MAC in the SC-DMAP Maritime Areas should prepare and publish a Public Engagement Plan concerning all matters relating to the Permitted Maritime Usage.'* We believe that transparent and thorough public participation from all stakeholders (including local communities and eNGOs) throughout the entire process is vital to ensure nature and people are protected.

We recognise the importance of the designation process and appreciate the opportunity to submit to the draft SC-DMAP consultation.

Kind regards,

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