

From:
Sent: 07 September 2016 23:21
To: foreshore
Subject: Foreshore Lease Galway

A Chara, Marine Planning and foreshore section, Department of the Environment, Community and Local Government, Newtown Rd, Wexford.

I am writing to you regarding the submission for the Foreshore Lease Application to construct an offshore Electricity Generating station FS006566.

My details:

email :
Date : September 7th, 2016

Please confirm receipt of this email.

I **object** to the proposed development. I object on the points outlined below:

Process

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed.

At the public consultation members of the public were advised that they are 3 independent projects and that at some stage, they may all be connected. The screening report specifically states that the test site will be connected to the cable. This is evidence of the poor consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for

2. Health & Safety in terms of light and noise pollution and visual assessments have been excluded in the screening report

Public Consultation Process / Local Impact

1. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.

2. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

3. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. The identity of the 'Local Fisherman' has not been disclosed. If this person was speaking on behalf of the fishing community, this consultation should have been official and the name(s) released.

4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and mis-leading and should not be included in the report

Visual

1. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night-time in good weather conditions.)

2. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.

3. I do not believe light pollution has been adequately addressed in the screening report

4. Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November [Sunday morning](#), looking into the low rising sun. In some of the montages, it is difficult to even see the burren landscape, which can be seen clearly from Spiddal. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.

7. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.

8. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is'

How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

‘This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.’

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.,

Therefore, I ask the Minister to refuse to grant this application.

Regards

Reference Number:

FS006566

Applicant: The Marine Institute

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

Submitted by:

A Chara,

Please e-mail me for clarification on any of the points noted in my submission.

I would like **to strongly object** to the lease application.

As background, I have personally invested a lot of time and effort reviewing this application and corresponding with the Marine Institute.

In addition to the multiple correspondences with the Marine Institute, I took up the opportunity to meet with Alan Berry and Michael Gilhooly at the Marine Institute in Oranmore. The purpose of this meeting was to discuss this application and the significant omissions and short-comings in the application. To date, I have not been satisfied that these omissions and short comings have been addressed and I am urging the FLU not to approve this application.

That said, please consider the main reasons as to why I am objecting this application.

Please respond to confirm that this submission has been accepted.

Is mise le meas,

Objection Reasons:

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed?

When we discussed this with the Marine Institute, we were advised that they are 3 independent projects and that at some stage, they may all be connected.

However, when I went back and re-read the screening report, it specifically states that the test site will be connected to the cable.

This is further evidence of the difficult consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for.

2. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.
3. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

4. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. We could not find any 'local fisherman' who had been directly consulted with. We know almost all of the local fishermen, as my immediate family have small fishing boats and have fished this area for over 40 years. Even with this local knowledge, we could not uncover the identity of this 'local fisherman'.

We asked the Marine Institute before, during and after our meeting to release the name of the 'Local Fisherman' and they stated that they could not get in touch with him to get his consent. They also stated that this consultation was in the form of a discussion / chat at the pier, as opposed to any formal written communication.

I believe that it is misleading to state that 'Local Fisherman' had been consulted with, when there is no evidence to substantiate this statement, and that the MI could not contact this individual in over a month.

Also, is it appropriate / legal to quote 'an individual' in a public report, but that individual cannot be named,

As examples of items 2,3 and 4 above, allow me to share some correspondence that I have had with the Marine Institute in an effort to obtain clear information. For clarity, I have included these correspondence and comments in Appendix 1.

In these examples (and there are many more), I had a simple request to confirm a small non-technical detail that I read in the Environmental Report. As I personally know most of the 'Local Fishermen', I wanted to talk to the one quoted in the report. I had initially some doubts about the correspondence / communication with the Local Fisherman, and I decided to ask the Marine Institute to confirm the identity.

As you can see from the e-mail, I was given completely conflicting responses. Therefore, you lose the TRUST of the public.

In the second example, I asked some very **specific** questions about the application and the process. In this case, the answers are not clearly provided.

I cannot state strongly enough how frustrated the general public are with public consultation process and the lack of clear answers. This alone is significant enough for the FLU to decline the application until the Marine Institute engages fully with the public in an open and transparent manner.

5. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states.. 'the ocean energy test site is

expected to stimulate the local economy and contribute to the vitality of the local community’

When we asked the Marine Institute to give a single example of how this test site may actually stimulate the local Spiddal economy, they could not provide any. Again, the original statement is misleading and therefore, should not be included in the report

6. Visual

- a. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night time in good weather conditions.)
- b. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.
- c. Most of the photo montage look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November Sunday morning, looking into the low rising sun. In some of the montages, it is difficult to even see the burren landscape, which can be seen clearly from Spiddal.
- d. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.
- e. During our discussions with the Marine Institute, they agreed that they were misleading and that this activity was outsourced and they were on a limited budget. They also stated that they could not provide more realistic photo montage, because this would need to be shared with all parties and could only be completed if there was a new application submitted.
- f. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.
- g. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.
- h. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is' How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The Marine Institute did not consider at all the southern portion of Galway bay and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands.

Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc..

In order to present a fair representation of what the test site may look like, please consider the 2 photos below. The first picture is taken from a residential house close to the test site. For scale purposes, and to show that it is not a zoomed image etc..there is a 5 year old child in the picture standing on a wall, approximately 100 metres from the shoreline. You can clearly see the existing weather buoy in the picture. I was informed it is about 4.5 metres above the water.



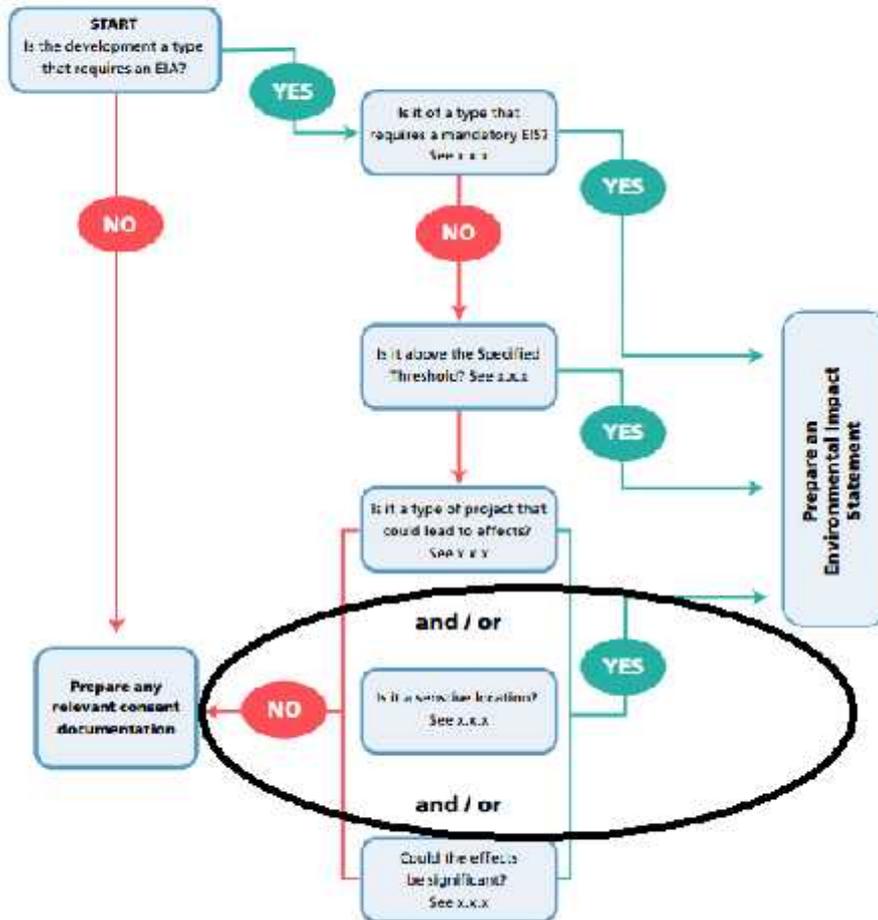
In the second picture, I have correctly scaled and crudely inserted what a wind turbine and a single device / sea station may look like from this location. Please compare this picture to the images presented by the marine institute, and assess how difficult it is for the public to make an informed decision based on the photo montages presented in the lease application.



7. Requirement for an EIS.

Based on the flow chart below, issued by the department, is the proposed site not in a sensitive location?

Therefore, an EIS should have been required.



8. Requirement for EIA

The following statement is quoted directly from SEA.

Subject of an EIA would be individual developments (projects) e.g. offshore wind farms, **wave/tidal demonstration projects or arrays**

Based on this flow chart, the screening report should have been followed up with an EIS. In this case, , it was screened out, which given the sensitive location seems like an incorrect decision.

9. Uncertainty with Wave and Tidal Technology.

The following statement is also quoted directly from SEA.

'In comparison, the wave and tidal industry is still at the testing and demonstration stage. As a consequence of this, and without any similar onshore or established industries from which experience and knowledge can be gained, there is still a relatively high level of uncertainty and lack of confidence with which potential effects can be identified. This has a knock on effect in terms of the consenting and licensing process as it is felt that, in a number of cases gaps in data and knowledge means that there is insufficient information and therefore evidence available for decision makers to determine whether a project would or would not have a significant adverse effect on the environment. **The consequence of this is that there is often a requirement for developers of individual projects to undertake significant amounts of survey work and monitoring to either inform consent or as a condition of consent.** In an industry where financial margins are tight as scales of economies have not been reached/optimised, additional survey and monitoring work can place significant financial pressure on developers.'

It is my belief that the application has not included the thorough assessments required to determine and prove that this project would NOT have significant adverse effects on the environment.

10. The application does not align with many aspects of SEA.

11. The Belmullet Test site required a full EIS, even though it was much further from shore and in a less sensitive location. Why is an EIS not required in Galway?

Appendix 1: Examples of Public Consultation / Lack of Clarity:

Example 1

See e-mail chain below.....

Note in particular the 2 responses that are highlighted in RED.

***** Start of email chain*****

From:

Sent: Monday 15 August 2016 09:45

To: Testsite Consultation

Subject: Re: Marine Institute - Galway Bay Marine and Renewable Energy Test Site - File ref. FS 006566

Hi,

I would like to confirm that I can attend this meeting on 11am on Thursday 25th August.

Can you please also confirm the following.

'Local Fisherman' was consulted with, in relation to this lease- can you confirm the names of the 'local fisherman' that you have been in contact with. We often fish his area for mackerel, and were not aware of this.

From:

Sent: Friday 19 August 2016 15:06

To: Testsite Consultation

Subject: Re: Marine Institute - Galway Bay Marine and Renewable Energy Test Site - File ref. FS 006566

Hi,

Can you please confirm the name of the 'Local Fisherman' who was consulted as part of this process, and when he was consulted.

I need to talk to him prior to the meeting on Thursday.

Surely this information should be available straight away.

Testsite Consultation <Testsite.Consultation@marine.ie>

Aug
19

to me

Dear

To provide you with the details of private individuals consulted we will have to obtain their consent prior to releasing their information. We will endeavour to provide you with the required information as soon as we get permission from the other parties concerned.

Kind Regards,
Conall O'Malley on behalf of the Testsite Consultation Team

Sep 6 (1
day ago)

to Testsite, Alan

Can I get some feedback to my queries that I submitted yesterday. I repeated them below for your convenience...

Time is running out before the submission deadline!!!!

Alan, Conall,

Can you please respond to me with the queries that we raised at our meeting at the Marine Institute.

1. After more than a month, can you confirm that you have been able to contact the 'local fisherman' and are you now in a position to release his name.

Testsite Consultation <Testsite.Consultation@marine.ie>

11:39 AM (10
hours ago)

to me

Dear

In response to your questions:

1. The Marine Institute is not releasing names of any of the individuals that we have met with as they have an entitlement to privacy and it would be a breach of our data protection obligations to do so.

***** End of email chain*****

Example 2

*****Questions asked over e-mail*****

Sep 6 (1 day ago)

to Testsite, Alan

Can I get some feedback to my queries that I submitted yesterday. I repeated them below for your convenience...

Time is running out before the submission deadline!!!!

Alan, Conall,

Can you please respond to me with the queries that we raised at our meeting at the Marine Institute.

1. After more than a month, can you confirm that you have been able to contact the 'local fisherman' and are you now in a position to release his name.

Or at least, could you confirm that you have made contact with him, and he has not given you permission to release his name.

2. Outline the main steps taken to assess the environmental impact, and what competent authority was involved in approving any of these steps.

3. It was explained to us at the meeting, how and why this application, without any connection to the cable is a viable option. However, when I went back and read various documents on the test site, it all states that the test site will be connected to the cable. Therefore, describing it as being viable without the cable connection, knowing full well that it will be connected is very misleading. Please add some clarity to this.

4. Please answer following question - Yes or No. Will the test site be connected to the grid? (Remember - Yes or No - do not tell me there is no facility to export power)

5. What implications , if any, does it make to the application, if it is connected to the grid.

Note - I will need a response to the queries above within the next 2 days, as I want to include the response (or lack of response) in my submission.

Regards

*****Response on Queries*****

to me

Dear

In response to your questions:

1. The Marine Institute is not releasing names of any of the individuals that we have met with as they have an entitlement to privacy and it would be a breach of our data protection obligations to do so.

2. The Marine Institute submitted an Environmental Screening Report to the Foreshore Licensing Unit (FLU) August 2015.

Based on an assessment of the Environmental Screening Report, the FLU informed the Marine Institute that an Environmental Impact Statement was not required for the proposed development of the Galway Bay Marine and Renewable Energy test site.

The Marine Institute has submitted a comprehensive Environmental Report on the proposed development as part of our application.

The 280 page report also includes 11 appendices which include technical and expert reports on the potential impact on a wide range of aspects including an 'Environmental Impact and Mitigation Desk Study' by Aquafact, as well additional reports on potential impacts on the seabed, flora and fauna, marine archaeology, and visual impact.

The FLU issued the above Environmental Report and appendices to the prescribed bodies (NPWS, Inland Fisheries, EPA, etc) for consultation.

The observations and recommendations from the prescribed bodies are available at <http://www.housing.gov.ie/planning/foreshore/applications/marine-institute-spiddal>.

The Foreshore Licencing Unit are the competent authority who will evaluate the foreshore lease application and associated environmental impact.

3. As discussed during our meeting here in the Marine Institute it was explained that the test site has operated for the past 10 years without a cable connection, and that two wave energy devices successfully completed testing of their devices during that time.

Device developers do not require cabled connection. It is not an absolute requirement for the test site. Device developers can supply power to their own devices in the absence of any cable (as they

have done in the past) and can receive data from their devices in the absence of any cable via wireless communications (as they have done in the past)

4. In the interest of clarity, power is delivered to the test site from the ESB, but power cannot be sent back from the test site to the grid.

5. The application does not request any grid connection.

Regards,
Alan Berry
on behalf of
Test Site Consultation Team
Marine Institute,
Rinville,
Oranmore,
Co. Galway.
T: [+353 \(0\)91 387200](tel:+353(0)91387200)
E: testsite.consultation@marine.ie

*****Question / Response and comments in red*****

My comments to the response are in RED

Dear

In response to your questions:

1. After more than a month, can you confirm that you have been able to contact the 'local fisherman' and are you now in a position to release his name.

1. The Marine Institute is not releasing names of any of the individuals that we have met with as they have an entitlement to privacy and it would be a breach of our data protection obligations to do so.

Comment: Conflicts with previous information...

. Outline the main steps taken to assess the environmental impact, and what competent authority was involved in approving any of these steps.

2. The Marine Institute submitted an Environmental Screening Report to the Foreshore Licensing Unit (FLU) August 2015.

Based on an assessment of the Environmental Screening Report, the FLU informed the Marine Institute that an Environmental Impact Statement was not required for the proposed development of the Galway Bay Marine and Renewable Energy test site.

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The FLU issued the above Environmental Report and appendices to the prescribed bodies (NPWS, Inland Fisheries, EPA, etc) for consultation.

The observations and recommendations from the prescribed bodies are available at <http://www.housing.gov.ie/planning/foreshore/applications/marine-institute-spiddal>.

The Foreshore Licencing Unit are the competent authority who will evaluate the foreshore lease application and associated environmental impact.

Main Comment: Just because a report is long, i.e. 280 pages, it does not mean that it is comprehensive. For example, there is about 7 pages of the reports, including various charts and graphs describing the demographic make-up of Spiddal and Furbo. Completely irrelevant, as this test site will not stimulate the local economy or generate any local jobs in Spiddal.

3. It was explained to us at the meeting, how and why this application, without any connection to the cable is a viable option. However, when I went back and read various documents on the test site, it all states that the test site will be connected to the cable. Therefore, describing it as being viable without the cable connection, knowing full well that it will be connected is very misleading. Please add some clarity to this.

3. As discussed during our meeting here in the Marine Institute it was explained that the test site has operated for the past 10 years without a cable connection, and that two wave energy devices successfully completed testing of their devices during that time.

Device developers do not require cabled connection. It is not an absolute requirement for the test site. Device developers can supply power to their own devices in the absence of any cable (as they have done in the past) and can receive data from their devices in the absence of any cable via wireless communications (as they have done in the past)

Is this adding clarity, or a justification for project splitting?

4. Please answer following question - Yes or No. Will the test site be connected to the grid? (Remember - Yes or No - do not tell me there is no facility to export power)

4. In the interest of clarity, power is delivered to the test site from the ESB, but power cannot be sent back from the test site to the grid.

That is not a Yes / No answer.

I think the answer should have been Yes – it is connected to the grid. - But hold on, it cannot be, because the answer to Q3 is that there is not even a cable, so we cannot say YES. But if there is no cable, how is power delivered to the site? So #3 above – there is no cable, #4, power is delivered to the test site from the ESB.

Are you confused yet? If not, keep asking questions and you soon will be!!!!!!

5. What implications , if any, does it make to the application, if it is connected to the grid.

1. The application does not request any grid connection.

I did not ask did the application request any grid connection. I did not get an answer to the question.

But my next question would be, do you need to include a grid connection in the application, if you intend to connect the cable to the test site?

Regards,
Alan Berry
on behalf of
Test Site Consultation Team
Marine Institute,
Rinville,
Oranmore,
Co. Galway.
T: [+353 \(0\)91 387200](tel:+353091387200)
E: testsite.consultation@marine.ie

From:
Sent: 08 September 2016 05:38
To: foreshore
Subject: Foreshore lease Application number FS006566

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development.

I object to the above lease as it will have an effect on the landscape in an area renowned for its natural beauty and is of great importance to our tourism industry. Galway Bay is on one of the most scenic coastlines in Ireland and it will be destroyed if such an development is allowed to go ahead.

Le meas,

From:
Sent: 08 September 2016 06:00
To: foreshore
Subject: Foreshore lease Application number FS006566

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. Such a development is not suitable in a relatively densely populated area of high scenic and cultural importance.

Regards,

ref:FS 006566 FORE SHORE LEASE APPLICATION BY MARINE ISITITUTE 'TO CONSTRUCT AN OFFSHORE ELECTRICITY GENERATING STATION' IN GALWAY BAY

Introduction

I stand in favour of renewable energies, and environment protection and welcome effective and proper transformation from fossil fuels to renewables and work towards reaching targets for renewables set by the EU.

However, I believe that there should be an overall plan for activities/usage and protection of Galway Bay

Foreshore Act (as it stands)

The Act provides little opportunity for public consultation and lacks transparency. There is no involvement of a planning authority, whether Local Authorities or An Bord Pleanala, in the granting of Foreshore Licences/Leases. The absence of any appeal procedure is not in line with best practice when it comes to decisions that affect the environment.

The Aarhus Convention aims to increase public involvement in all matters relating to the environment. Its provisions are broken down into three pillars – Access to information, Public participation in environmental decision making and access to justice. Because there is no system of any appeals of a Foreshore Lease, there is no proper access to justice for people with concerns.

The Galway Bay Test Site

This new lease applied for as per Marine Institute wording is to upgrade the existing test site facilities. This application has to be considered in conjunction with the two other recent licence 1 The cable licence and 2 The extension of time licence

Why has the 'underwater ocean observatory' been deployed and now in operation at the site while it only now included in the new application which the Marine Institute are applying for. Its not included in the original 2006 licence which is still in existence through the extension of time licence granted. This is breach of the licence, and for that reason the Marine Institute should not be awarded this new lease, as there is no evidence in the existing lease to allow for this.

The original lease in 2006 was a 10 page document with two schedules. The extensions of time on this lease was granted in July this year. Why is this extension of time on existing lease now become 60 page document with 10 schedules, including more scope, allowance of increase in area (100m) of activity, conduits, cables, running of cables, construction and

development. Surely all this new developments within and out the lease area should have been applied for under a new complete lease and not on an request for 'extension of time lease'. Assuming the Marine Institute was still working within the existing lease rules

The longitude and Latitude central point co-ordinates given on the new application does not correspond with the 2006 licence. This is a serious change to the application as now they don't correspond with each other central point.

The Marine Institute go on to say 'The Galway Bay Marine and Renewable Energy Test Site is not, and will not be connected by a power export cable to the national grid' yet ESB International was required to complete report for the Sustainable Energy Authority of Ireland (SEAI) detailing the feasibility of a cable connection (both onshore and offshore) to the quarter scale wave energy test site in Galway Bay. SEAI intend to establish the facility as a grid connected location for Wave Energy Converter (WEC) developers. This is obvious an option MI looked and may still do.

From 2006 up to this year only two devices were tested at the site, the Wavebob and the Ocean Energy Buoy.

Why has The Marine Institute applied for a lease using the form 'To Construct an Offshore Electricity Generating Station', while a 'Foreshore Investigation Licensing' form is designed to facilitate the testing of devices and /or site conditions.

In 2006 should have applied for a '**Investigative Foreshore Licence Application (Offshore Renewable Energy)**' before applying for Foreshore Lease Application, when you are investigating producing power.

The Test Site in question when selected back in 2006, according to the Marine Institute it had all the attributes ideally required for ... scale wave energy test site. (wave power were in line with ... of that in offshore) It is a special place off valuable Natural Resource and as such should be protected. There is no evidence available of any alternative suitable sites been sought after. Up to now there were only two know devices tested there (incl. wavebob). So the site was underutilized

Visual and proximity to land

SmartBay (Desk Based) Environmental Impact Mitigation Study states (3.2.3) Physical Presence...'As the test site has been in operation for 10 years it has become an unofficial exclusion zone'

The above statement is totally untrue.

The test site is only in operation when item is being tested

Even though the site is in existence for the past 10 years, up to now there were only two know devices tested there (incl. wavebob). So the site was underutilized with only small cardinal markers, Boats, dinghy's sail boats, etc., rowing boats, etc., freely and manpowered in and out of the site with no interference. One device at a time had on site, and most of the 10 years nothing was there at all.

Therefore, the visual impact and exclusion zone up till now were not as familiar to the environment as this new lease will allow for.

The applicant is looking for a lease to install various devices including a permanent sea station which will house a generator, fluids, oils and diesel. Testing of wind turbines and other devices not yet invented. All this just over 1 km from the coastline on the wild atlantic way

Across Europe a best practice buffer zone of 22kms for any development. Already this buffer zone is in place in Germany, Belgium and The Netherlands. A similar buffer zone has been recommended in Denmark and in the UK.

This section of Galway Bay from Inveran to Galway City is designated as being of a 'High Landscape Value Rating' in the Galway County Development Plan (2009-2015).

The Galway/Connemara coastline are vital to our heritage. Its natural beauty and its literary associations play an important role in tourism/culture in this area. (Failte Ireland were not consulted regarding this development). Any development of whatever type will change and impact on our land and seascapes, and because of the size and proximity of this development would mean the industrialisation of this section of our coast.

We also have concerns about the competence of Smartbay going forward. Our previous experience of Devices breaking their mooring and freely moving around the bay while some came to tangle near shore, and only to Smartbay been been notified by members of the public about this.

There is no effort here to conserve and enhance our coast, as a unique and precious resource and ensure that our marine planning is not developer led. Ireland has the opportunity to become a world leader in protecting our coastal scenery and seascape

It will radically alter the character of the coast for the next 35 years and have a significant adverse visual impact on the coastal seascape

Given the above, what specific steps are the government taking to ensure local community acceptance and adherence to international best practice. Will the government ensure that all information in relation to this project is provided to the local community and their concerns will be taken into consideration before any decision is made on the project.

Environment

The foreshore along our coast are an important breeding and foraging ground for many marine species. Of particular concern are those protected under the EU Habitats Directive. To date there were no comments from Birdwatch Ireland to assessment of the project and its likely to have a significant effect on the integrity of this area. The proximity of the project to shoreline including SACs will have an effect on its integrity. The installation of devices could potentially seriously damage and disturb the habitats of these protected species.

No alternative site was presented to the public, this is in contrary to various EU Directives

The government is not implementing the SEA here, and are breaching its own assessment, especially of seascapes and protected areas -

Also in 2014 the remains of an ancient forest was uncover near the test site at the foreshore at lippa (less than 1k away). This is not mentioned anywhere in the so called desk based EIS, *[The north Connemara coastline could be one of this island's richest "time capsules" of life before sea levels rose, according to State archaeologists who have removed a 3,700-year-old structure from the shore in Co Galway.](#)*

see link

<http://www.irishtimes.com/news/ireland/irish-news/ancient-oak-structure-from-connemara-coast-excavated-and-taken-into-state-care-1.1900755>

The application does not cover it in a correct manner, it not a proper EIS, its mainly desk based studies and based on asumptions with little or no reference to the sighting of potential ship wrecks.

On the Marine Institute Application for the cable project (project-splitting) it mentions the discovery of a 'possible ship wreck' but goes on to say 'no future investigation This need to be proofed without a shadow of doubt and not assumptions.

The National Monuments Service of the Department of the Environment and Local Government holds information on shipwrecks off the coast of Ireland. Have they been consulted to determine if any listed shipwrecks are near by

No

Appropriate Assessment Screening for the Test Site, as in accordance with the requirements of Article 6(3) of the EU Habitats Directive

Effect on Marine Traffic and Pleasure Boats

Loss of cruising routes

When examining the routes and location of those devices it is important to recognise that sailing boats behave differently to power driven craft and that their actual line of travel may 'zigzag' across their intended direction of travel upwind as they are dependent on the wind direction. Along many stretches of coast, recreational craft may need to seek shelter in poor

weather. Sheltered harbours and anchorages and routes to these harbours of refuge should be protected. The loss of routes will also lead to an increased distance of travel. This has environmental implications for powered craft and safety implications for all craft. With its narrow channels or strong tidal flows, may already be hazardous at times to navigate through and adding hazards in these areas may seriously compromise navigational safety or cause unacceptable deviations from optimum routes. There are also safety issues with the creation of turbulence and wind shadowing in confined areas where craft may be moving slowly and gusty turbulent conditions may create problem. The location of this site may well lead to the potential loss of amenity for recreational craft. It should also be noted that commercial routes and shipping lanes do not represent those routes taken by the vast majority of recreational craft which tend to sail much closer to the shore

Squeeze into commercial routes

Recreational routes differ from commercial routes as recreational craft essentially aim to keep out of the major commercial navigation routes by travelling in the shallower adjacent waters or taking entirely different routes. As a result, the examination of commercial routes through AIS plotting alone will not ensure the safe positioning of testing devices, recreational boating must also be taken into account when assessing the impact on navigational risk. This may require routes through large developments to be identified or inshore routes for smaller craft to be safeguarded. The cumulative impact of all marine developments is becoming increasingly important when assessing these issues of squeeze.

Effect on sailing and racing areas

Most of the general day sailing and racing areas are close to the shore and in sheltered waters. The Netherlands and Germany have already excluded any development within 12nm of the shore in order to retain 'open space' for its amenity and recreational value. Recreational activity is important to the health and wellbeing of the community as well as providing economic support for the local coastal economies. Retaining the undisturbed remoteness of some waters will be important in terms of its wilderness and amenity value

The percentage of recreational yachts and traditional Heritage Boats could well be at risk from rotor height collision

There is no Risk assessment included to evaluation the potential hazards and subsequent evaluation of any associated risks. Uncertainties must be clearly considered and presented. Part of the difficulty in risk management is that measurement of both of the quantities in which risk assessment is concerned - potential loss and probability of occurrence - can be very difficult to measure and the chance of error in measuring these two concepts is large

Noise Assessment.

Normally a licensed facility will be required to have a periodic noise assessment. The nature and scope of the assessment should be determined by site specific conditions and operational history Environmental Protection Agency should require a licensee to undertake a more extensive assessment. Noise measurement should be appropriate to the facility and representative sampling intervals should be selected and justified

There are concerns regarding noise and visual impact with no Environmental impact statement required to carry out an environmental impact assessment. The applicant failed to carry out a proper environmental impact assessment, while their environmental impact assessment is flawed – statutory framework governing environmental impact assessment

They should have correctly examined and evaluated this site as far as the effect of noise levels on human beings are concerned. The applicant simply fettered its discretion by applying noise limits or other standards recommended under Guidelines and their own decision imposed noise limits without carrying out any assessment of the significance of the increase in noise over background noise at this location on human beings living in the vicinity of the proposed test site. The application is flawed since he did not carry out an assessment of the significance of the increase in noise over background noise levels at the location of the test site, and they did not carry out any assessment of the actual anticipated noise impact on existing houses by reference to background noise levels - report contains no assessment of the significance of the increase in noise over background noise levels that would affect human beings residing in the vicinity as a result of noise emitted from the turbines and other devices - no conclusion reached by the inspector or the Board as to whether the level of increase in noise would be significant or acceptable, and accordingly there has been no analysis or evaluation by the Board of the direct effects of the proposed development in the context of noise impact on human beings

The application proposes to have a fixed Sea Station on the site which will include a Generator as well as other devices

Accurate and meaningful generator set sound-level data should be measured in a “free field environment.” A free field, as distinguished from a “reverberant field,” is a sound field in which there are negligible effects from sound being reflected from obstacles or boundaries. Noise measurements should be made using a sound level meter and an octave band filter set, at a minimum, to allow for more detailed analysis by acoustical consultants.

Generator set noise levels can approach 100 dB(A) or more,

Also the application shows distance from site to nearest dwelling, but again as it's a desk based study it doesn't use up to date maps to take account for new houses which have been built near shore in close proximity to this site, so yet again the information given is false and misleading,

We live in a low noise environment –

They have failed to have regard to the correct noise level measurement for the purpose of determining both the background noise levels and the appropriate noise limits to be applied – failed to apply separate noise limits for day-time and night-time – failed to have regard to the specific absolute daytime noise limit - failed to have regard to the relevant noise measurements

The applicant has ignored the Guidelines in relation to the fixing of a noise limit recommended for a low noise environment and has failed to carry out an environmental impact assessment in relation to the overall project.

Wildlife/Marine Mammals

The site supports an important common seal colony and a breeding otter population, both of which are listed under Annex II of the EU Habitats Directive

cetacean species recorded visually in Galway Bay include: Bottlenose dolphin *Tursiops truncatus*, Harbour Porpoise

Phocoena phocoena, Common dolphin *Delphinus delphis*, Killer whale, Minke whale, Pilot whale *Globiocephala melas*, Risso's dolphin *Grampus griseus*, Sperm whale *Physeter microcephalus*

Clearly the area at Spiddal is an important habitat for the Harbour porpoise with the almost daily presence at the site. This presence is influenced by seasonal, diel and tidal factors. As harbour porpoises (Annex II species of the Habitats Directive) are present throughout the year and entitled to strict habitat protection,

There are significant numbers of cetaceans and seals in Irish coastal waters. All marine mammals are afforded protection as annex IV species under the EU Habitats Directive. The Directive also lists six marine mammals under Annex II (protected endangered and vulnerable). These include the Bottlenose dolphin, Harbour porpoise, Grey seal, Common seal and European otter

There are at least 38 protected Habitats including the Common Seal, European Otter and Cetaceans

These wonder freely in our bay and have done for long time. There is a serious danger of them getting injured and killed with these devices at the test site, and unknown device over the next 35 years

All these are common in and around the test site

According to SEI own report regarding this test site

... 'A diverse range of marine, coastal and terrestrial habitats, including several listed on **Annex I** of the EU Habitats Directive, occur within the site, making it an area of high scientific importance. The SAC site is located approximately 7km from the proposed development site...'

Also the **Hen Harrier** is frequently seen in this area and has been documented by Birdwatch Ireland has been spotted in Spiddal

<http://www.birdwatchgalway.org/2006sightingsarchive.htm>

2nd November: Ringtail Hen Harrier, Knockagarraun, Spiddal (Aonghus O'Donail).

<http://www.birdwatchgalway.org/newsarchive.htm>

Also spotted in the Spiddal area are Red Throated Diver, Hen Harrier, Merlin, Peregrine, Golden Plover, Chough, Kingfisher and Corncrake.

The Irish research vessel, the [RV Celtic Explorer](#), has, in recent years, been helping to shed light on some extreme weather conditions along the west coast in the past.

The vessel has taken 5-metre 'cores' through sediments that lie at the bottom of Galway Bay. These samples, when retrieved and analysed, were shown to contain the shells of creatures that were known to have evolved only in the last 10,000 years. That meant that the deposits were less than 10,000 years old, and were laid down after the last Ice Age.

No mention of this in the lease application

Test Site is within:- 3K of Moycullen Bog Complex

9K of Burren World Heritage Site

10K of Galway Bay Complex

1K of Protected Focal Point

3K of shipping route (south side)

Size zone – effects on fishing, water sports and leisure – tourism

The European Wind Energy Association states the locations of existing and planned offshore wind projects in the EU tend to be geographically separate from areas of high coastal tourist use. A development of a 22 km buffer zone use by several countries. A number of studies have been done on the visual impact on amenities available to both the local community and the tourist industry . Jacob Ladenburg and Sanja Lutzeyer have suggested that from “a welfare economic point of view there is a non-trivial economic trade-off between offshore generation costs and the visual impacts from offshore wind farms. The site in question was chosen specifically for its natural ... scale wave energy, and led to believe testing for ... scale device only. Its only common sense that the wind energy here is not at ... scale powerbut much more like full scale as in offshore. Subsea currents at the site are also not the same as with those offshore. Therefore, site should have only been for testing wave energy at ... as for the reason only and for other devices which are not reverent to this ... scale. While we are aware this is still only a test site of a smaller scale it's still grossly out of character and not in line good practice because of its location, size, knows and unknown devices to be used of a period of 35 years, if this licence is granted

While many of the American studies concentrate on the trade off between the visual impact, the financial benefits provided to the local community to compensate for the visual loss of amenity versus the environmental benefits to society as a whole; they all stress the importance of openness, engagement with the local community, a democratic process that involves the local community in an attempt to balance all the various concerns and interests.

This coastal area is a huge tourist attraction and the visual impact on this is of major concern,

from all areas on both Galway and Clare coastlines as well as higher grounds back from shore

Legal Obligations

legal obligations not been fully compliance to.

The issue is in relation to the impact on the legally required assessment

Environmental Impact Assessment and Consultation Obligations arising from EU Directives and the Aarhus Convention in respect of the assessment of environmental effects, effectiveness of public consultation and trans-boundary impact assessment, where this latter also arises from our obligations under the Espoo Convention⁵ ;

SmartBay do not seem to fully compliance with EU regulations in order for accessing research/testing funds from Europe

Environmental Impact Assessment and Consultation Obligations arising from the SEA Directive and the Aarhus Convention in respect of the assessment of environmental effects, effectiveness of public consultation and transboundary impact assessment, where this latter also arises from our obligations under the Espoo Convention

The consideration of public consultation is a fundamental component of the assessment of environmental effects which the competent authority is required to consider – and is therefore necessarily compromised.

The public's rights to such consultation entitlement pursuant to the Aarhus Convention Articles 7 are also compromised.

ANNEX I Information referred to in Article 5(1) The information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following: (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme; (c) the environmental characteristics of areas likely to be significantly affected; (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC; (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation; (f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors; (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme; (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of knowhow)

encountered in compiling the required information; (i) a description of the measures envisaged concerning monitoring in accordance with

The European Boating Association (EBA) expects their guidance to be used by offshore renewable energy developers seeking consent to undertake marine works. Furthermore, the EBA expects to be consulted on matters that may affect recreational craft during any type of assessment

Project Splitting

This Test Site is been a victim of Project Splitting

The term “project splitting” originally covered instances where individual elements of a larger project requiring an EIS are approved without EIS or EIA, whereas if the project was considered as a sum of these parts, it would be governed by Section 172(1)(a) and Part 2 of Schedule 5 of the Regulations, and accordingly would require an EIS. The European Commission document “Rulings of the Court of Justice - Environmental Impact Assessment of Projects”(REF #1)states on page 24 “The purpose of the EIA Directive cannot be circumvented by the splitting of projects and the failure to take account of the cumulative effect of several projects must not mean in practice that they all escape the obligation to carry out an assessment when, taken together, they are likely to have significant effects on the environment within the meaning of Article 2(1) of the EIA Directive.”, the national court should be reminded that the objective of the legislation cannot be circumvented by the splitting of projects and that failure to take account of their cumulative effect must not mean in practice that they all escape the obligation to carry out an assessment when, taken together, they are likely to have significant effects on the environment within the meaning of Article 2(1) of Directive 85/337

The consequence of “project splitting” is to convey a false perception of limited project scale among the residents of the receiving environment coupled with an expectation by the developer of favourable planning decisions for subsequent phases of the project based on the principle of consistency with permitted applications

Summary

We are in favour of developing renewable energies. But in this case however, EU directives and international best practice are not been observed. The Danish, who could be considered leaders in this field produce 30% of their electricity through renewables. They have recently moved toward introducing a buffer zone of 22 km and they have produced extensive studies on near shore and off shore wind projects. Inadequate Regulation

The manner in which this site so close to the shoreline is been allocated to development is out of line with good international practice and in contravention of all principles of proper planning and sustainable development. This Test Site is in the wrong place for such activities, while alternative sites were not fully investigated before the grant of the 2006 licence. likely to have significant effects on the environment.

An Environmental Impact Assessment and Consultation Obligations arising from the SEA Directive and the Aarhus Convention in respect of the assessment of environmental effects, effectiveness of public consultation and transboundary impact assessment, where this latter also arises from our obligations under the Espoo Convention

There is:

No public right of appeal against Minister's decision to an independent appeals board such as An Bord Pleanala

No statutory involvement of local authorities

No Maritime Spatial Plan

No National Plan for offshore renewable energy development

No National cost benefit analysis to ensure that proposed developments were in the public interest

No Strategic Environmental Assessment (contrary to EU SEA Directive) .

No pre selection of potential sites

No restriction on size of development or proximity to shore

No Environmental Screening Report until late August available (should have been at the start)

No Environmental Screening Report as Gaeilge

No input or comments from Failte Ireland (on wild Atlantic way)

No input or comments from Birdwatch Ireland

No independent, professional assessment of cumulative landscape impact of developments on adjoining coastline and coastal "views & prospects" designated for protection in county development plans.

No transparent

Most of the Reports Are Desk Based

There is no effort to evaluate the potential effects on tourism of this major industrial development in Galway Bay,

The applicant failed to carry out a proper environmental impact assessment, while their environmental impact assessment is flawed – statutory framework governing environmental impact assessment

The assessment of the impacts on tourism are not addressed

The management of our foreshore is been demand driven, rather than plan led

We believe that the licence should not be provided for this site and alternative sites should be properly assessed

Considering the above we ask you not to grant the Foreshore lease for this particular project as the process is not in line with EU requirements and the public are not offered the full provisions recommended in the Aarhus Convention.

This 35 lease will have significant effects on the environment for numerous reasons, including the fact that the application cannot be looked as a standalone project. It has to be consider in conjunction with: -

1. The cable project which joins this site with land for electricity and data
2. The extension of time lease application to the 2006 licence (which the Marine Institute violated/broke when they deployed before have a licence granted to do so
3. The discovery of possible ship wrecks. / Discovery of ancient foreshore forest near the site.
4. Most of the reporting is vague and desk based/ not on site
5. Wildlife discovery near site
6. Water contamination by testing materials, waste, oil/fluids spillage
7. The site is in a very rich and active area for both marine mammals/fish and sea goers/fishing/please boats/swimming and community amenity area
8. A lot of mobile marine mammals in Galway Bay move around, so what you see in one specific area one week/day may very well be seen in another area as well the next week/day
9. The application not sufficiently well supported” or “analysed” in relation to specific conservation objectives for protected habitats, and there are key outstanding concerns” about the implications of this lease, and most of it is desk based reporting
10. The whole process is all wrong, including omitting assessment reports from the beginning to the end
11. The public consultation was a shambles, the public did not get answers to their questions, Marine Institute were unable to answer allot of the questions at the consultation meetings. Difficult for the public to understand the process, read the whole application. Not well advertised, Public consultation came to a close when chairman decided to end it with lots more questions from the floor still unanswered. A lot of the public unable to get time of work to go to the Marine Institute ask more questions. The Marine Institute added more documents to the file less than two weeks before submissions closing date. This document ‘Screening Report’ was supposed to be there from the beginning, but left out and only appeared later. Allot of errors and misleading information. Photo montage also miss leading and not easy access, it should have been on display on the walls (visual) at all public consultation, but

instead was just left on the side on a table with other details. Most of the public did not see it. The last document to be made available were not accessible through Irish

I object to the granting of this licence on all of the above grounds as well as the whole process been a mess, misleading, and not done proper.

From:
Sent: 08 September 2016 08:39
To: foreshore
Subject: Letter of objection to test site An Spideal

A Chara

I refer to the Foreshore Lease Application FS006566 and strongly object to the proposed development.

I object to the above lease as it will have an effect on the landscape along this area which is renowned for its natural beauty and is of great importance to our tourism industry. I do not understand why Tourism has not been considered in this application. The impact on tourism has implications at National and local levels in terms of revenue and employment.

The proposed location is on a scenic route just west of Galway city. It is part of the Wild Atlantic way, the Wild Atlantic way is promoted worldwide and to have a development like this so close to An Spidéal would have negative impact on this stunning coast line. Tourism plays an important role in the economy of the village and its hinterland. It benefits from scenic landscapes, seaside location, proximity to city amenities and its cultural distinctiveness.

Regards

This email is confidential and subject to important disclaimers and conditions including on offers for the purchase or sale of securities, accuracy and completeness of information, viruses, confidentiality, legal privilege, and legal entity disclaimers, available at

From:
Sent: 08 September 2016 10:29
To: foreshore
Subject: Submission Letter - Foreshore Lease Application Number FS006566

Submission Letter:

Submission made to: Marine Planning and Foreshore Section, Department of the Environment,
Community and Local Government, Newtown Rd, Wexford, Co. Wexford.
Email: foreshore@environ.ie

Seolta ar son: / On behalf of: ___

Seoladh / Address: _____

GuthÆn / Tel / Riomhphost / Email:

DÆta / Date: ___02-09-
16_____

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** Applicant: **The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Process

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed?

At the public consultation members of the public were advised that they are 3 independent projects and that at some stage, they may all be connected.

The screening report specifically states that the test site will be connected to the cable.

This is evidence of the poor consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for.

2. Health & Safety in terms of light and noise pollution and visual assessments have been excluded in the screening report

General – Public Consultation

1. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.
2. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

3. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. The identity of the 'Local Fisherman' has not been disclosed. If this person was speaking on behalf of the fishing community, this consultation should have been official and the name(s) released.

4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and mis-leading and should not be included in the report

Visual

1. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night-time in good weather conditions.)

2. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.

3. I do not believe light pollution has been adequately addressed in the screening report

4. Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November Sunday morning, looking into the low rising sun. In some of the montages, it is difficult to even see the burren landscape, which can be seen clearly from Spiddal.

5. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.

7. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.

8. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is'

How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

‘This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.’

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.,

Finally, Is the minister satisfied that the application and approval is fair, unbiased, accurate , complete and objective?

From:
Sent: 08 September 2016 13:05
To: foreshore
Subject: Submission re application FS006566 for Foreshore Lease in Galway Bay

Dear sir / Madam,

I am objecting to the granting of application FS006566, “Application for a Foreshore lease for the construction of an Offshore Electricity Generating Station” for the following reasons;

- Firstly I have been deprived of an Environmental Impact Statement and as a result I do not have the information I require to assess the impact this development will have on the community and the wellbeing of the local and visiting tourists. Therefore I request that an Environmental Impact Study is conducted and circulated to the community before a decision is made with regards to this application.
- Galway bay is known worldwide and with the Wild Atlantic Way bringing more tourists to the area which generates much needed jobs and income locally I am at a loss to understand why the impact on tourism has not been considered in this application. I am requesting that this is addressed before a decision is made with regards to this application
- No consideration has been given to the fact that Galway (City and County) has been selected as the European Capital of Culture for 2020. This title is worth an estimated €70 million in terms of funding and tourism. It is also potentially worth several thousand new jobs and the expected number of tourists is estimated to be in the region of 500,000. One of the primary reasons why Galway was selected as European Capital of Culture for 2020 is that *“the drama of its coastline from Salthill Prom to the wilds of Connemara is unmatched and always excites”* and that the Aran Islands per the National Geographic are *“One of the world’s top island destinations. That this feeling, this authenticity has survived the modern world, is nothing short of miraculous.”* To date the coast line and bay has been unspoilt and the views of the Aran Islands, Clare Coast including the world famous Cliffs of Moher are a major attraction for tourists which visit from all over the world. Therefore I request that the impact on tourism is fully evaluated and taken into consideration before a decision is made with regards to this application.
- Finally I do not understand why a 35 year lease is being requested / considered for this application. If granted it will destroy the beauty of Galway Bay forever, have a serious impact on tourism, employment and the life of the local residents who live in the area or tourists that visit or pass through the area. I have lived in this area all my life and am the 8th generation of my family to do so, I regularly fish from the rocks directly opposite where this development is planned for and am passing on the traditions that were handed down to me to my children therefore I request that this application is refused so that Galway bay is there for my children (and their children) to enjoy and treasure as I and my family have done down through the generations.

Therefore I am requesting that the Minister refuses granting of this application.

I am also requesting that you acknowledge receipt of this submission and keep me informed of progress / decision that are made in regards to this application.

Yours Sincerely,

PS I am reserving the right to add to my submission, should further concerns arise in light of information not presently available to me.



PRIVACY: This e-mail may contain information that is privileged or confidential. If you are not the intended recipient, please delete the e-mail and any attachments and notify the sender immediately, and do not use, copy, or disclose to anyone any of the contents hereof.

From:
Sent: 08 September 2016 13:15
To: foreshore
Subject: Aighneacht mar gheall ar Foreshore Lease Application Uimhir:-FS006566

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

1. The proposed location is on a scenic route just west of Galway city. It is part of the Wild Atlantic way, the Wild Atlantic way is promoted worldwide and to have a development like this so close to An Spidéal would have undesirable impact on this spectacular coast line. Tourism plays a central role in the economy of the village and its hinterland. It benefits from scenic landscapes, seaside location, proximity to city amenities and its cultural distinctiveness. Galway will be hosting European City of Culture in 2020, Galway city and county hope to receive a lot of extra visitors to the county. Galway 2020 will be a great opportunity to promote our beautiful county and it would be a disgrace to have an offshore site with devices such as wind turbines on Galway Bay.

2. I believe that the lease of 35 years is not realistic as no one can predict what devices would be tested on the site so far in future. If this lease is allowed the marine institute will be able to test whatever they wish. A lease of such long duration is not acceptable. I am also very anxious about the noise pollution/visual impact of this site. I believe that inadequate research has been done and I believe that the environmental report submitted by the Marine Institute is not conclusive and an EIS should be provided before any decision is made.

Mise le meas

From:
Sent: 08 September 2016 15:58
To: foreshore
Subject: FORESHORE LEASE APPLICATION NUMBER FSOO6566

A Chara,

In reference to the above mentioned foreshore lease application, i wish to object on the grounds that an independent EIS survey has not been carried out on the effects a 35 yr lease would have on the enviroment. I would submit that an enviromental study should include what effects an installation would have on the people that are living in the area as well as sealife and wildlife that will be affected.

Mise le meas,

From:
Sent: 08 September 2016 14:48
To: foreshore
Subject: Objection submission

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie
(Closing Date: Seol roimh: 09/09/2016)

Seolta ar son: / On behalf of:

Seoladh

Guthán /Tel/ríomhphost /email:

Data:

_____ Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: "Foreshore Lease Application to Construct an Offshore Electricity Generating Station" – Application No: FS006566 (Should an extension to the closing date be granted I reserve the right to add further information to this submission) A chara, I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

I think there should be further discussion in the community about what is going to be put in the bay and how long it's going to be there. And environmental impact report should be made available to the general public. We can't keep giving away a resources to private companies. We should be given time to discuss this in the community and to have a say in the outcome without rushing it through. 35 years is a long time.

Sent from my iPhone

Tag/Re: - **“Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – FS006566**

Aighneacht mar gheall ar Foreshore Lease Application Uimhir: - **FS006566** - Iarratsóir: Foras na Mara.
Submission regarding Foreshore Lease Application Number: - **FS006566** - Applicant: The Marine Institute

Cinntigh le ríomh phost go bhfuarthas mo aighneacht aonair, ag déanamh tagairt don ainm thíos le do thoil.

Please confirm by email, receipt of this individual submission referencing the name below.

Ainm:

A chara,

Tagraím don iarratas léas thuas, Foreshore Lease Application FS006566 agus tá mé go láidir ina choinne. Tá mé ag agóid ar na pointí a léirítear thíos:

I refer to the above Foreshore Lease Application FS006566 and I strongly object to the proposed development. I object on the points outlined below:

1. The consultation process was not adequate from beginning to end. The process was described as a mess by our Public Representatives at the public meeting on July 21st 2016, (the day the Dáil closed for summer). Following public and individual requests for time to consider the proposed project when our Dáil elected representatives were available to us, at the last moment, the day public consultation was to end, the Minister extended the consultation process until 9th September, ignoring the many requests that the process would be extended into the next Dáil sitting, after 27th September. The whole saga was extremely stressful; I was denied my right to be represented in the Dáil during the last few weeks; I do not understand the rush to get this project closed to public submissions? I have just learned that EU funding has already been granted to test devices at the Test Site – is this what is dictating the rush to end the consultation period before the public’s questions are answered?
2. Our public representatives were not available to us while the Dáil was not sitting; answers to our question were difficult to obtain - Residents have had to form a group – ‘*Guth Comhshaoil*’ -to inform themselves of the process and to try to gather and share information.
 - a. The developer will not come to the area to meet with locals who still have questions; the ‘invitation’ to travel to the Marine Institute on the other side of the city places a barrier in the consultation process – there are some who do not have the various resources to travel.
 - b. The conditions attached to the ‘invitation’ in terms of a maximum limit of three people per group and providing names and questions in advance unsatisfactory and questionable in this day and age.
 - c. There are many questions the developer has still not answered for us – the day before the consultation period closes.

- d. Information has been 'drip' fed to the public; one thinks they have all the information and yet, without notification, more information appears on the website; (30/08/16 Screening Report appeared).
 - e. Public consultees' responses still incomplete on the website.
 - f. One day before the end of submission, the Marine Institute has not answer emailed questions.
 - g. It seems that those who will be living beside the development, who will be affected by the project 24 hours of every day for the next 35 years, were to be left out of the consultation process. Notification of any public meetings during January and June were not adequately advertised, and the written notification did not refer to an application regarding a 35 year Foreshore Lease Application – just an 'information meeting'.
 - h. I do not believe that I was in any way considered or involved early enough in the decision-making process of this application; the last few weeks of the extension have been stressful – the public left to try to discover information for themselves without the necessary expertise, data, or public representation necessary to guide us in adequately considering this application.
3. Could the Minister explain why all local and national stakeholders involved in Tourism have been excluded from the consultation process? An Spidéal relies on Coastal Tourism.
4. The whole community of stakeholders in Co. Clare have not been informed and have been excluded from the consultation process; Galway Bay is a national resource, why did consultation not happen at national level?
5. Only one Environmental NGO seems to have been consulted – an astounding fact considering the sensitive location of the Test Site. Could the Minister explain why only one Environmental NGO has been consulted in this process?
6. Could the Minister explain to the public why the response of the one Environmental NGO – BirdWatch Ireland has not been published to date?
7. Could the Minister explain why An Taisce was not listed in the appointed consultees list drafted by his department?
8. I object to consenting to the development as I believe, in the interest of transparency, the above two, and other Environmental NGOs ought to have been consulted and their responses available to inform the public on environmental issues regarding this application.
9. The existence of the Test Site at its present location is questionable – why were there no Environmental Assessments done in 2006 regarding the various protected sites surrounding the area?

10. Why is the current application split into three smaller projects? I believe this puts the protected environment at risk and that the cumulative effects of this development has not been assessed as required by law. Furthermore, the cumulative effects of other development in Galway Bay (e.g. Docks Development, Rossaveal Harbour Development and others) have not been considered.
11. The issue of grid connection is still unclear – I believe that the site is grid connected – as Minister Coveney stated in an email to a member of the public – and thus, needs to be appropriately assessed. Is the Minister satisfied that the ‘project’ has been appropriately assessed as required by various EU legislation as a grid connected project?
12. Is the Minister satisfied that the ‘whole development’ – Galway Bay Test Site / Cable Project – has been appropriately assessed according to various current environmental laws relating to a grid connected development?
13. The screening process for EIA has excluded vital elements of the process –
- a. Visual Landscape and Seascape Assessment has not been included for some inexplicable reason; Galway Bay’s Unesco heritage site, the Burren and Cliffs of Moher, excluded, why? This development will be seen 10km away, according to the Environmental Report submitted, thus it will be a blot on the seascape from the Galway and Clare coast line. This aspect needs to be assessed according to EIA and SEA directives I believe.
 - b. Marine Archaeology has not been screened, - ignoring local knowledge, reported to the Marine Archology Unit of the Department of AHRRG, and ignoring state recorded data of ship wrecks in the area.
 - c. The screening report contains many serious errors in the data presented. Pollution has not been declared – Noise and Light, among others, are pollutants that have not been declared by the developer in the screening process, putting the health and safety of those of us who live in the area, humans, flora and fauna, at risk. Nuisance has not been assessed as required; protected areas excluded from the screening report; transformer nature of the project ignored; -
 - d. The EIA screening for the cumulative effects of the development with other developments contains inaccurate and missing information; for instance Galway Harbour Development and all other development in Galway Bay have been excluded; the development involves ‘project splitting’ into three separate applications (cable and onshore station), and the accumulative effect of this splitting has not been assessed. The assertion that no EIA is needed is flawed.

As the screening stage of the EIA process is so flawed, the application must be refused; or will be public be forced to push the issue, spending public monies on a Judicial

Review? Is the Minister satisfied that the EIA screening report is complete, accurate, objective and in compliance with the various environmental legislation governing this process?

14. The AA Screening report also contains absent, inaccurate and misleading information. Again various areas protected by Environmental Legislation has been omitted from the screening process; protected species screened out from those areas included in the screening process, without acceptable reason, e.g. the distance for salmon is 'too great and no pathway for interaction' (pg32) ; I believe salmon can swim great distances? For the past 70 plus years, while I have worked on the shore, harvesting seaweed, fishing, and walking and relaxing, I have seen otters, and seals alive and well, on the shore where the Environmental Report claim none exist, – so why have they been screened out? Why have the Reefs at Pouldallagh been screened out? Can pollutants not travel in water? Where will the disturbed sediment end up?
15. The Marine Birds excluded are of concern; again, there is local and NPWS evidence that species screened out of the AA screening process use the area. Considering that BirdWatch Ireland have not commented on the development, and that I often see many of those Marine Birds that have been screened out of the AA screening process in the area in question, I can only conclude that the data presented by the developer is inaccurate. Information from 'desk studies' is simply not adequate data for a development of this nature in such a sensitive environment.
16. There are many references throughout the documents presented in this application to the significant negative impacts on sensitive protected environments; for example possible loss and disturbance to of habits, smothering and contamination from sediment disturbance, the negative effects of EMF, loss of feeding and breeding areas, disturbance due to noise, barriers to movement within the Galway Bay marine environment, the release of pollutants (lead and aluminium), 'toxic to mammals', the risks of oil leaks in a marine environment, hydraulic injury, collision risks to protected species above and below water – particularly disturbing to me is the identification of the possibility of 'corkscrew injuries' to protected marine mammals in Galway Bay (Section 6 of the Environmental Report). This issue alone ought to necessitate a complete Appropriate Assessment process. I have been denied the right to the full and accurate data that would have resulted from applying the AA Directive process correctly which would allow me, and the public a large, to consider this project and its impact on our environment so that I could really participate in the process of public consultation.
17. Considering the above, I am calling for The Precautionary Principle to be invoked, as set down by the UN OSPAR Convention. I believe that there are reasonable grounds for concern that the nature of this project may bring about hazards to

human health, harm living resources and marine ecosystems, damage amenities and interfere with other legitimate uses of the sea. I object to this development and I deny consent.

18. I call for the SEA Directive to be applied to this 'development' as it is part of a national 'plan', and not simply a 'project' in itself. Consideration of alternative plans need to be presented to the public.

19. The whole process of considering this application has been a stressful community exercise, resulting in mistrust in the developer; neither the Government Authority responsible for this application nor the developer explained the planning process to the public. I still have not been presented with information on what the project will actually look or sound like, day or night. Visual Data presented in this regard was misleading and has not yet been corrected by the developer, who cannot, to date, identify a local 'coastal track' from where the visual data was collected. I have lived in the area all my life, and have no knowledge of this track, which leaves me now questioning if it even exists? The developer mislead the community at a public meeting (14 June, 2016 – three days before the original closing date for public consultation), regarding who in the community had been consulted about the application; the local sailing club was named, yet, it transpired that this was not the case. A local 'fisherman' is noted as being consulted, yet, no one in the fishing community is aware of who this could be? Just one unknown 'fisherman' consulted and this constitutes 'public consultation'?

20. The lack of transparency and levels of 'conflict of interest' in this application are of concern.

21. The application has many other elements of testing (aquaculture, antifouling agents, Marine Institute Smartbay National Infrastructure Access Programme, etc,) not declared in the application form. This is not transparent and not acceptable.

Minister, I do not give my consent to this Foreshore Lease Application (FS006566).

Is mise,

FS 006566 Foreshore Application Marine Institute

I am objecting on the grounds 'of its size and proximity to the coast' and 'the serious detrimental impact' it will have on our coastline, visual impact, safety of sea goers, boating, danger to birds and marine wildlife protected under EU environmental legislation and the impact it will have on our natural heritage assets, The whole manner/process this application was given to the public to understand/ and try make sense of was not done in the correct manner.

It will prove a particular eyesore to all, especially since this site was totally underutilised up to now, it will be a big shock to people to see this new proposed development on our bay.

Why destroy a section of our bay, when other countries are leading by example of having a buffer zone of no go areas around their coast line. We seem to always be 20 years behind other countries with this concept. This is typical of an Irish solution to an Irish problem.

There is no evidence of an EIS been carried out when this test site was first selected.

There is no evidence that alternative sites were looked at and totally/proper research carried out.

(It's a requirement that other sites be first investigated)

Ireland are yet again here breaking EU Directives

If allowed this development will fence in and industrialise a section of our coastline, significantly altering the character and quality of all the coastal 'views and prospects listed in 'Galway County Development Plan'. The danger to tourism is unquantifiable.

No alternative site was researched for suitability, and while the site in question has been there for over 10 years, it lay totally underutilised until now, with only a few small devices in place for short periods.

Development which degrades our coastline cannot be deemed to be sustainable. Other EU countries are protecting their coastlines. Ireland must do likewise.'

The whole of the Connemara Coastline is one of the most beautiful coastal areas of the world.

A planning permission for a house in along this coast can have 30+ planning conditions in order of protecting visual amenity, and many are refused planning permission for housing on visual or environmental grounds in Connemara while now a foreshore lease for industrial development in the same locality without any proper regard for the environment or the visual amenity.

Spiddal Story

One would first need to study all Marine Institute/Smart Bay/SEAI foreshore applications from 2006 to date in order to see the chain of links and mistakes/errors.

There are a lot of issues of great concerns

One been in the 'Grant of extension for 1 year to the existing 2006 licence' In this grant to approve extension in time also allows for other activities and extension to the area (Size) of the existing site, this new document 'Grant of extension' goes way beyond the existing licence, and contains four times more documents that was in the original

Surely by law a grant of extension on time to a lease that to run out should be just that and not allow for more development with the lease

The vetting committee for the Dept. of Envy. on this lease application also consist of three people (experts) from the Marine Institute, and the Chief Executive of Irish Lights (who is also on the board of Smart Bay), and various other influential people. The minister for Marine who stated public that he is in favour of this development, has the final word on granting this licence.

How can one be judge and jury of your own case, which is the case here? Even if they were to stand back from this application, they have too much influence on this application. It should be totally validated and judged by independent EU experts.

This undermines the whole process here, and lacks faith and trust in our public bodies to do the right things, with other some much influence.

The site in the wrong location

The documentation and environment reports included in this application come from either the Marine Institute themselves or other groups which have more to gain by approving of this application than not. All the reporting is very vague and bias towards the approval of this licence.

The location of these wind turbines, and devices on protected habitat close to protected coastal landscapes, is out of line with good international practice, reflecting the inadequate regulation of the sector. These structures and devices are too big and too close to shore. The average distance from shore of these devices is 1.2 km. The average distance from shore of wind farms under construction in Europe is 30km according to the European Wind Energy Association. The visual impact of these devices (which the fotomontage gives a false image) on adjoining coastal landscapes is a key consideration in all EU maritime countries, with countries such as Germany introducing 22km buffer zones around their coasts to protect visual amenity. This application gives no consideration to these major aspects which reflects the dominance of development interests.

This application (including previous) is been advanced under the outdated Foreshore Act 1933 which gives the Minister for the Environment sole authority to permit construction in Irish waters. There is no system of appeal against the Minister's decision. This adds to undermine public confidence in the way our cost lines are governed. New legislation is needed

.

There is alot of local community and extened concern at the manner in which this lease is been aproached, and with no cost benefit analysis and little community consultation in line with the complex and volume of the lease application documents. There is no structure of legal, technical or environmental expert advice available (willingly) to the general concerned public, and without this assistance it very much undermines their observation and comments to this lease application.

Finally,.

If/when this lease application will be granted under the terms of this lease,

- it will allow for a wide range of unknown device both in size and height to be constructed.

- The whole shoreline from high water mark to the far (outer end) side of the test site will be in control by the Marine Institute, which in effect can control access to land anywhere between Furbo and Spiddal
 - There is allowance for a power generating structure which can be connected to the national grid
 - What impacts, will all these devices on on marine species.
 - What happens if these devices break their moorings and drift across shipping and other sea going users or coming ashore (this has already happened on three occasions
 - Landscapes/seascapes and areas of high scenic amenity Scope: It is proposed to assess the potential visual impacts of the installation of offshore energy devices located in all areas on landscapes /seascapes and areas of high scenic amenity value.
 - The Galway City Draft Development Plan states that “ Galway Bay, is an integral part of the aesthetic landscape and culture of the city”, which has many benefits
-
- There is a substantial and serious issue with project splitting in regard to the proposed development which forms one element of a much larger development

There is no proper indication of size/location on site of Sea Station (Eye sore, Noise, Visual, close to shore line, etc.)

Basically in a nutshell the way this lease is drawn up, it gives Marine Institute freedom to do what they want.

This licence if granted would give the Marine Institute an open licence to do whatever they want over a 35-year period. It will kill some wildlife/mammals and very possible put human life at danger of the 35 year lease period. There is no form of risk worth this. As its in area of high activity both human and wildlife. This type of renewal energy testing on Galway Bay goes against all of whats good about the environment and shall end up with blue energy testing destroying the bay. Its development and money driven, without proper screening and care to environment so close to land

Some day in the future, the younger people will read this email and get to understand as to what they see out there and how it unfolded

I ask on the minister to refuse grant of this licence

From:
Sent: 08 September 2016 17:49
To: foreshore
Subject: Foreshore Lease Application FS006566

On behalf of :
Seoladh :

8th Sept 2016

A chara,

I refer to the Foreshore Lease Application FS006566 and strongly object to the proposed development. I object on the points outlined below

Application is still incomplete - information not made available to the public - still awaiting replies from those who were required to comment on the project..... misleading information on the application, exclusion zone and connection to the grid questions remain unclear to the public. Incorrect information on the application form, SACs missing and measurements of nearest dwellings incorrect.

I strongly object in order to protect our most iconic landscapes. The site is clearly visible while on the Galway county scenic route.

The site is visible on the Galway county protected Focal Points and Views.

From:
Sent: 08 September 2016 17:50
To: foreshore
Subject: Submission Letter - Foreshore Lease Application Number FS006566

Submission Letter:

Seolta ar son: / On behalf of:

Seoladh / Address:

Guth/En / Tel / Riomhphost / Email

DÆta / Date: 08 Sep 2016

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** Applicant: **The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A Chara,

Please e-mail me for clarification on any of the points noted in my submission.

I would like **to strongly object** to the lease application.

As background, I have personally invested a lot of time and effort reviewing this application and corresponding with the Marine Institute.

In addition to the multiple correspondences with the Marine Institute, I took up the opportunity to meet with Alan Berry and Michael Gilhooly at the Marine Institute in Oranmore. The purpose of this meeting was to discuss this application and the significant omissions and short-comings in the application. To date, I have not been satisfied that these omissions and short comings have been addressed and I am urging the FLU not to approve this application.

It is my hope that following an unbiased, comprehensive review that the FLU will reject this application and I will not be forced to request an oral hearing or judicial review of this decision, either in Ireland or Europe.

That said, please consider the main reasons as to why I am objecting this application.

Please respond to confirm that this submission has been accepted.

Is mise le meas,

Objection Reasons:

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed?

When we discussed this with the Marine Institute, we were advised that they are 3 independent projects and that at some stage, they may all be connected. However, when I went back and re-read the screening report, it specifically states that the test site will be connected to the cable. This is further evidence of the difficult consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for.

2. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.

3. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

4. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. We could not find any 'local fisherman' who had been directly consulted with. We know almost all of the local fishermen, as my immediate family have small fishing boats and have fished this area for over 40 years. Even with this local knowledge, we could not uncover the identity of this 'local fisherman'.

We asked the Marine Institute before, during and after our meeting to release the name of the 'Local Fisherman' and they stated that they could not get in touch with him to get his consent. They also stated that this consultation was in the form of a discussion / chat at the pier, as opposed to any formal written communication.

I believe that it is misleading to state that 'Local Fisherman' had been consulted with, when there is no evidence to substantiate this statement, and that the MI could not contact this individual in over a month.

Also, is it appropriate / legal to quote 'an individual' in a public report, but that individual cannot be named.

I cannot state strongly enough how frustrated the general public are with public consultation process and the lack of clear answers. This alone is significant enough for the FLU to decline the application until the Marine Institute engages fully with the public in an open and transparent manner.

5. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states.. 'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'

When we asked the Marine Institute to give a single example of how this test site may actually stimulate the local Spiddal economy, they could not provide any. Again, the original statement is misleading and therefore, should not be included in the report

6. Visual

- a. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night time in good weather conditions.)
- b. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.
- c. Most of the photo montage look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November Sunday morning, looking into the low rising sun. In some of the montages, it is difficult to even see the burren landscape, which can be seen clearly from Spiddal.
- d. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.
- e. During our discussions with the Marine Institute, they agreed that they were misleading and that this activity was outsourced and they were on a limited budget. They also stated that they could not provide more realistic photo montage, because this would need to be shared with all parties and could only be completed if there was a new application submitted.
- f. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.
- g. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.
- h. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is' How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The Marine Institute did not consider at all the southern portion of Galway bay and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands.

Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc..

7. Requirement for EIA

The following statement is quoted directly from SEA.

Subject of an EIA would be individual developments (projects) e.g. offshore wind farms, wave/tidal demonstration projects or arrays

8. Uncertainty with Wave and Tidal Technology.

The following statement is also quoted directly from SEA.

'In comparison, the wave and tidal industry is still at the testing and demonstration stage. As a consequence of this, and without any similar onshore or established industries from which experience and knowledge can be gained, there is still a relatively high level of uncertainty and lack of confidence with which potential effects can be identified. This has a knock on effect in terms of the consenting and licensing process as it is felt that, in a number of cases gaps in data and knowledge means that there is insufficient information and therefore evidence available for decision makers to determine whether a project would or would not have a significant adverse effect on the environment. The consequence of this is that there is often a requirement for developers of individual projects to undertake significant amounts of survey work and monitoring to either inform consent or as a condition of consent. In an industry where financial margins are tight as scales of economies have not been reached/optimised, additional survey and monitoring work can place significant financial pressure on developers.'

It is my belief that the application has not included the thorough assessments required to determine and prove that this project would NOT have significant adverse effects on the environment.

- The application does not align with many aspects of SEA.
- Has the Health & Safety of the local community been assessed correctly in this application

Question for the Minister

Is the minister satisfied that the application and approval is fair, unbiased, accurate , complete and objective?

From:
Sent: 08 September 2016 18:06
To: foreshore
Subject: Foreshore lease Application number FS006566

A chara

I refer to the above Foreshore Lease Application and strongly object to the proposed development. My objection is based on the points I make below:

35 years is a considerable timespan and I would be concerned at what might be tested on the site so far into the future. Testing for that duration could have an adverse effect on what is one of Ireland's most beautiful coastlines – a stunning natural amenity for locals and visitors from Ireland and further afield.

I would be concerned about possible noise pollution and the visual impact such a development would have on the area.

With very best wishes.

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie (Closing Date: Seol roimh: 09/09/2016)

Seolta ar son: /

Seoladh/Address

Ríomhphost /email:

Data: 08/09/2016

Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: **“Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – Application No: FS006566** (Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Galway Bay is famous worldwide for its untamed beauty and unspoilt scenic views. To blot this view with large scale devices is completely unacceptable. The Wild Atlantic Way has been a huge success and to risk damaging this success is absolute nonsense. This site will be clearly visible from at least four viewing points on The Wild Atlantic way and one would assume that they have been chosen as view points because of the unspoilt scenic views. Fáilte Ireland have not been consulted in this process and NO other location for the site has been considered which is of huge concern to me.

The Marine Institute State that most testing will take place between April- September. This is the busiest time of year for tourism and the only months of the year that a lot of locals make their yearly living. Are we to risk this with views of bulky structures on our bay? Clean/Green energy possibly is the way to go but at what cost and to whom?

The application refers quite a lot to the fact that the test site has been there for 10 years with no issues in relation to visual impact, as if this application is more of the same. The true facts are that in the last 10 years only 2 small scale devices have been on the site. Some of the devices listed on this application are 15 – 20 times the footprint of what has been there in the past and there may be up to 3 of them at a time, plus a sea station which will be permanent. This is evidently not even close to the same in terms of visual impact and is completely misleading by the Marine Institute to suggest that is.

The government have an obligation to implement and uphold the Aarhus Convention and to truly engage with communities on issues that are of huge importance to them. This has not been done!! Also the person responsible for the granting of any Foreshore licence is required to be impartial. It seems to me that this cannot be the case if the person responsible is Minister Coveney who has already publically stated that he is in favour of Galway Bay becoming a test bed for renewable energy.

Not only has the proper consultation process not been followed but the information put forward to date by the Marine Institute has been obscure, vague and intentionally misleading for example...

Application FS006566 states WILL NOT BE CONNECTED TO GRID However, cable application FS005751 has a full section on the GRID CONNECTION. Obviously the cable will be connected to the site, so which is it and how are we supposed to make sense of that. This is again either intentionally misleading or one of the applications is stating an outright lie. This project has been split to sneak it in under the radar and as far as I can make out with my limited knowledge of the law on such things that it is actually illegal to split such a project.

The Marine Institute have tried to pawn this project off as a small scale research facility for innovation in marine energy development. However after much trawling through paperwork it is now apparent that the real purpose and intention is not for testing innovative devices, as most of the devices listed in application FS 006566 have already been tested and implemented elsewhere and if not could be tested elsewhere. The real purpose seems to be testing how much electricity can be generated by wave and tidal devices on Galway Bay to encourage long term commercial development by both national and international investors in Galway Bay. Hence the 35yr lease application which is completely outside the bounds and remit of any other innovation test project..

In conclusion Europe may need our waves but they are not the property of the government to give away. Natural resources belonging to the people of Ireland have in the past been irresponsibly surrendered by governments, our fish, our oil, our gas now our waves. Is it that the people of Ireland should allow our quality of life, environment, wildlife, marine life, landscapes and seascapes to be degraded and devalued so that the rest of Europe can preserve theirs?

I strongly urge the minister to refuse the granting of this licence on the above grounds

From:
Sent: 08 September 2016 19:29
To: foreshore
Subject: Aighneacht mar gheall ar Foreshore Lease Application Uimhir: - FS006566

Cinntigh go bhfuarthas aighneacht aonair ag déanamh tagairt don ainm thuas.
Please confirm receipt of this individual submission referencing the above name.

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

1. It is noted that the foreshore lease application has identified that the proposed development will generate 50dB(A) of noise. This presents a serious concern to residents within the general vicinity of the proposed development and I would call on Minister Coveney to reject the foreshore lease application in this context.

2. The structures proposed to be located within Galway Bay according to said development are considered to be visually obstructive. The natures of said proposed structures are inconsistent with the nature and character of Galway Bay and the foreshore lease should be refused.

3. The driving route, water based activities and Island access, represents an economic cornerstone of the Wild Atlantic Way for Galway City, through Spiddal and onwards through Connemara. The potential damage to the visual amenity of this area, places the economic benefits annually accruing from Tourism in serious jeopardy. Tourism has shown a 13% increase in the first half of 2016, with the vast majority of International Tourist choosing the Wild Atlantic Way as their destination of choice within Ireland. I consider that the proposed development will seriously damage tourism, which has become the dominant industry within the Spiddal area.

4. I object to the length of the lease being applied for on the basis that it is far too long to provide sufficient guarantees against developments which may have further negative impacts on my home and on my family. I consider that no one can predict what devices can be tested so far into the future.

5. I note that an environmental impact statement was not provided and therefore we do not have the information needed to inform us of the impact this development will have on the local community.

Is mise,

From:
Sent: 08 September 2016 19:43
To: foreshore
Subject: Aighneacht mar gheall ar Foreshore Lease Application Uimhir: - FS006566

Cinntigh go bhfuarthas aighneacht aonair ag dØanamh tagairt don ainm thuas.

(Please confirm receipt of this individual submission referencing the above name).

Application / Iarratas **“Foreshore Lease Application to Construct an Offshore Electricity Generating Station”**

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

1. I am greatly concerned and object to the proposed foreshore lease application. I object to the length of the lease being applied for on the basis that it is far too long to provide sufficient guarantees against developments which may have further negative impacts on my home, on my children and grandchildren. I believe at this stage that no one can predict what devices can be tested so far into the future. I would call on the minister to reject the foreshore lease application.
2. It is noted that the foreshore lease application has identified that the proposed development is expected to generate 50dB(A) of noise. This presents a serious concern to residents within the general vicinity of the proposed development. I have not seen results for any tests from my location to support the claim that the devices will operate at a maximum of 50dB(A) factoring in all weather conditions.
3. Having fished from the shorelines for 70 years I'm apprehensive about the damage and affect that any test devices may have on marine life due to pollution from and the mechanics of the test devices.

4. My dwelling house was built in 1930's and according to the map attached to the application (http://www.housing.gov.ie/sites/default/files/foreshore-applications/application-documents/marine_institute-spiddal-location_map_distances.pdf) my house is not represented on the map. I cannot understand how my house along with many others has been omitted from the map when it will be directly looking out on this proposed test site.

5. I believe the current environmental report provided with the application is not sufficient and strongly request a more independent and comprehensive environmental statement.

6. The proposed test site will adversely impact on the value of my property.

Is mise,

From:
Sent: 08 September 2016 20:49
To: foreshore
Subject: Submission Letter-Foreshore Lease Application Number FS006566

Submission Letter:

Seolta ar son: / On behalf of:

Seoladh / Address:

GuthÆn / Tel / Riomhphost / Email

DÆta / Date:0709-16

Please confirm receipt of this individual submission referencing the above name.

DÆta / Date:0709-16

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** Applicant: **The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Process

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed.

At the public consultation members of the public were advised that they are 3 independent projects and that at some stage, they may all be connected. The screening report specifically states that the test site will be connected to the cable. This is evidence of the poor consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for

2. Health & Safety in terms of light and noise pollution and visual assessments have been excluded in the screening report

Public Consultation Process / Local Impact

1. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.

2. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

3. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. The identity of the 'Local Fisherman' has not been disclosed. If this person was speaking on behalf of the fishing community, this consultation should have been official and the name(s) released.

4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and mis-leading and should not be included in the report

Visual

1. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night-time in good weather conditions.)

2. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.

3. I do not believe light pollution has been adequately addressed in the screening report

4. Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November [Sunday morning](#), looking into the low rising sun. In some of the montages, it is difficult to even see the burren landscape, which can be seen clearly from Spiddal.

5. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.

7. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.

8. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is'

How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.,

Question for the Minister

Is the minister satisfied that the application and approval is fair, unbiased, accurate , complete and objective?

Sent from my iPad

From:
Sent: 08 September 2016 20:49
To: foreshore
Subject: Submission Letter-Foreshore Lease Application Number FS006566

Submission Letter:

Seolta ar son: / On behalf of:

Seoladh / Address:

GuthÆn / Tel / Riomhphost / Email:

DÆta / Date:0709-16

Please confirm receipt of this individual submission referencing the above name.

DÆta / Date:0709-16

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** Applicant: **The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Process

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed.

At the public consultation members of the public were advised that they are 3 independent projects and that at some stage, they may all be connected. The screening report specifically states that the test site will be connected to the cable. This is evidence of the poor consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for

2. Health & Safety in terms of light and noise pollution and visual assessments have been excluded in the screening report

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2. The title of the application is very misleading and not consistent with the documents to support the application.

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Other Titles: Marine and Renewable Energy Test Site

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4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and mis-leading and should not be included in the report

Visual

1. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night-time in good weather conditions.)

2. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.

3. I do not believe light pollution has been adequately addressed in the screening report

4. Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November [Sunday morning](#), looking into the low rising sun. In some of the montages, it is difficult to even see the burren landscape, which can be seen clearly from Spiddal.

5. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.

7. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.

8. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is'

How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.,

Question for the Minister

Is the minister satisfied that the application and approval is fair, unbiased, accurate , complete and objective?

Sent from my iPad

From:
Sent: 08 September 2016 21:53
To: foreshore
Subject: Objection

I, _____, am making this objection on my own behalf.
I object to the granting of Application FSOO6566 on the following grounds:

- The proposed development was not adequately screened to determine if an Environmental Impact Statement was necessary
- There has been no Environmental Impact Statement provided
- The size of the development is too large for the area
- Tourism has not been taken into account
- There has not been sufficient consultation with local residents
- Local public representatives have been denied the opportunity to represent me in this matter
- A 35 year lease is too long and is unnecessary for the purpose stated in the application.

I therefore ask the Minister to refuse the application.

Signed: _____ Date 08/09/16

From:
Sent: 08 September 2016 22:17
To: foreshore
Subject: Foreshore Lease Application FS006566

On behalf of :
Seoladh :

8th Sept 2016

A chara,
I refer to the Foreshore Lease Application FS006566 and strongly object to the proposed development. I object on the points outlined below
Application is still incomplete - information not made available to the public - still awaiting replies from those who were required to comment on the project..... misleading information on the application, exclusion zone and connection to the grid questions remain unclear to the public.
Incorrect information on the application form, SACs missing and measurements of nearest dwellings incorrect.
I strongly object in order to protect our most iconic landscapes. The site is clearly visible while on the Galway county scenic route.
The site is visible on the Galway county protected Focal Points and Views.

Kind regards,

On behalf of :

Seoladh :

8th Sept 2016

A chara,
I refer to the Foreshore Lease Application FS006566 and strongly object to the proposed development. I object on the points outlined below:

Application is still incomplete - information not made available to the public - still awaiting replies from those who were required to comment on the project..... misleading information on the application, exclusion zone and connection to the grid questions remain unclear to the public.

Incorrect information on the application form, SACs missing and measurements of nearest dwellings incorrect.

I strongly object in order to protect our most iconic landscapes. The site is clearly visible while on the Galway county scenic route.

The site is visible on the Galway county protected Focal Points and Views.

Regards,

From:
Sent: 08 September 2016 22:22
To: foreshore
Subject: Foreshore Lease Application FS006566

On behalf of :
Seoladh :

8th Sept 2016

A chara,

I refer to the Foreshore Lease Application FS006566 and strongly object to the proposed development. I object on the points outlined below

Application is still incomplete - information not made available to the public - still awaiting replies from those who were required to comment on the project..... misleading information on the application, exclusion zone and connection to the grid questions remain unclear to the public.

Incorrect information on the application form, SACs missing and measurements of nearest dwellings incorrect.

I strongly object in order to protect our most iconic landscapes. The site is clearly visible while on the Galway county scenic route.

The site is visible on the Galway county protected Focal Points and Views.

Kind regards,

From:
Sent: 08 September 2016 22:34
To: foreshore
Subject: Objection

I, _____, am making this objection on my own behalf.
I object to the granting of Application FSOO6566 on the following grounds:

- The proposed development was not adequately screened to determine if an Environmental Impact Statement was necessary
- There has been no Environmental Impact Statement provided
- The size of the development is too large for the area
- Tourism has not been taken into account
- There has not been sufficient consultation with local residents
- Local public representatives have been denied the opportunity to represent me in this matter
- A 35 year lease is too long and is unnecessary for the purpose stated in the application.

I therefore ask the Minister to refuse the application.

Signed: _____ Date 08/09/16

From:
Sent: 08 September 2016 22:54
To: foreshore
Subject: Objection

I, _____ am making this objection on my own behalf.
I object to the granting of Application FSOO6566 on the following grounds:

- The proposed development was not adequately screened to determine if an Environmental Impact Statement was necessary
- There has been no Environmental Impact Statement provided
- The size of the development is too large for the area
- Tourism has not been taken into account
- There has not been sufficient consultation with local residents
- Local public representatives have been denied the opportunity to represent me in this matter
- A 35 year lease is too long and is unnecessary for the purpose stated in the application.

I therefore ask the Minister to refuse the application.

Signed _____ Date 08/09/16

From:
Sent: 08 September 2016 22:54
To: foreshore
Subject: Aighneacht mar gheall ar Foreshore Lease Application Uimhir: - FS006566

Please confirm receipt of this individual submission referencing the above name.

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

1. On the application it is stated “the structures may appear slightly ambiguous compared to vessels and structures that might be more familiar”. I am concerned and object to having any structures that may appear as quoted on application as slightly ambiguous. According to The Galway development plan it states that “*Within this area it is recommended that wind farms be located only in the 30m perimeter zone around the NHA’s. Additionally no wind farms are recommended for the immediate coastal zone i.e. at least 100m above the high tide mark, to maintain pedestrian access to the shoreline and to minimise intrusion upon the sea backdrop of the Galway coast from the coastal road. 3.113 To the immediate north of the road the landscape is rated as a ‘Strategic area’ where wind farm development is considered appropriate to the landscape setting. The turbines would not intrude upon views of the scenic coast but would be seen against a backdrop to the foothills of the Connemara Mountains*” I understand that this is a test site and not going to be a wind farm but a test device of wind turbine is purposed for the site and I object to having such a device tested on Galway Bay.

2. On page 183 of the attached document http://www.housing.gov.ie/sites/default/files/foreshore-applications/application-documents/marine_institute-spiddal-environmental_report.pdf it states that “*There will be a minor degree of visual clutter generated within the seaward aspect of this view. However, this is tempered slightly by the perception of the three dimensional layout of the structures due to the slightly elevated nature of the view (actual separation distances between structures can be appreciated). Visitors may experience some visual confusion associated with the cluster of differing forms within a defined section of the bay. However, the facility has already been in place for nearly 10 years and it is not considered that the current proposal detracts from any sensitive qualities associated with this seascape context. Overall, the magnitude of visual impact*

is considered to be Low.”

I disagree with this statement on the basis that the magnitude of the proposed development is much greater than what has been on this site over the past 10 years. As a resident living at the location of Viewshed Reference Point - R336 coast road at Doorath I believe this will have a much bigger impact on my quality of life than indicated in this report.

3. It is stated on the foreshore lease application that the proposed development will generate 50dB of noise. This presents a serious concern to me as I live so close to the proposed development. I would question the maximum noise levels of 50dB(A) and I cannot understand how a maximum noise level can be predicted when the applicant does not provide clear guidance on devices to be tested on this site so far into the future.

4. I have concerns on the map attached to the application http://www.housing.gov.ie/sites/default/files/foreshore-applications/application-documents/marine_institute-spiddal-location_map_distances.pdf

My house along with many other houses which are on the south side of the road, directly facing the proposed development have been omitted. Some of these houses have been here for nearly 80 years.

5. According to the environment report attached to the application it has mentioned that *“The renewable energy test devices will have hydraulic fluid in them and there is the possibility of minor leakages which may contaminate water, benthic communities and potentially fish and shellfish if the nature and quantity of material lost is sufficient. The SeaStation will also contain an external diesel generator and there is the potential for leakages from this. The SeaStation may also house transformers which can sometimes be filled with oil. Contamination can be in the dissolved phase or in the form of a slick forming low solubility liquids. Marine birds are particularly sensitive to contamination by oil based compounds (AECOM Ltd., 2010).”* I would be greatly concerned of the impact this pollution may have on the local environment. This affects many things for example our fishing from the shoreline, our recreational use of the water and impact on tourism.

6. At the moment four permanent markers are situated at each corner of the proposed test site and measure at 3.35 metres. The new proposed new markers will be 7 metres in height, twice the size and will have an amplified light. According to the Environmental Impact and Mitigation Desk Study for the Galway Bay Marine and Renewable Energy Test Site the *“North cardinal has a continuous white flashing light”*. As my house looks out directly onto one of these

markers I am greatly concerned that the light from these markers will have a negative impact on my home and quality of life.

7. I object to the length of the lease (i.e. 35 years) being applied for on the grounds that it is far too long to provide adequate guarantees against developments which may have further negative impacts on my home and our community. I believe at this stage that no one can adequately predict what devices can be tested so far in the future, once the lease is approved the local community have no authority/ approval over the devices that could added at the site.

8. The adverse impacts of noise pollution and flickering effect from a wind turbine as well as the unsightly nature of this test site which will restrict my view of an untouched Galway bay will have an effect on my quality of life. These adverse impacts when coupled with the uncertainty over future test devices and developments on this site for the next 35 years will immediately devalue my property.

9. I believe the current environmental report provided with the application is not sufficient and strongly request a more independent and comprehensive EIS.

Is mise

Reference Number:

FS006566

Applicant: The Marine Institute

Application: "Foreshore Lease application to Construct an Offshore Electricity Generating Station"

Submitted by:

A Chara,

I would like to object to the lease application specified above for the following reasons.

Please respond to this e-mail to confirm that this submission has been accepted. If you need any additional information do not hesitate to contact me. Thank you for your help.

Is mise le meas,

Objection 1:

The title of the application (Application for lease to construct an off shore electricity generating station) suggests the installation of a grid connected power station. The supporting environmental report however (Marine and Renewable Energy Test Site) is related to a test site. I do not understand how an application can be accepted based on a report which is linked to what appears to be a different project.

Objection 2:

The environmental report states that a 'local fisherman' was consulted with during the application process. While this objection is not doubting that a discussion took place it doesn't make sense that an anonymous source has been referenced in the main body of the report. I cannot see how anonymous information or opinions can be used to support an application. The report does not provide a contact or reference in order to substantiate the consultation further.

Objection 3:

There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night time in good weather conditions.) There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.

Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. In some of the montages, it is difficult to even see the Burren landscape, which can be seen clearly from Spiddal.

The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

Objection 4:

According to information available in the "Strategic Environmental Assessment (SEA) of the Offshore Renewable Energy Development Plan (ORED) in the Republic of Ireland" (prepared by SEAI) numerous environmental considerations have been completely ignored. The following statement is quoted directly from SEA.

'In comparison, the wave and tidal industry is still at the testing and demonstration stage. As a consequence of this, and without any similar onshore or established industries from which experience and knowledge can be gained, there is still a relatively high level of uncertainty and lack of confidence with which potential effects can be identified. This has a knock on effect in terms of the consenting and licensing process as it is felt that, in a number of cases gaps in data and knowledge means that there is insufficient information and therefore evidence available for decision makers to determine whether a project would or would not have a significant adverse effect on the environment. The consequence of this is that there is often a requirement for developers of individual projects to undertake significant amounts of survey work and monitoring to either inform consent or as a condition of consent. In an industry where financial margins are tight as scales of economies have not been reached/optimised, additional survey and monitoring work can place significant financial pressure on developers.'

It is my belief that the application has not included the thorough assessments required to determine and prove that this project would not have significant adverse effects on the environment.

1. The application does not align with many aspects of SEA.
2. The Belmullet Test site required a full EIS, even though it was much further from shore and in a less sensitive location. Why is an EIS not required in Galway?

From:
Sent: 08 September 2016 23:05
To: foreshore
Subject: Submission Letter - Foreshore Lease Application Number FS006566

Submission Letter:

Seolta ar son: / On behalf of:

Seoladh / Address:

Guth/En / Tel / Riomhphost /

DÆta / Date: 08/09/2016

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** Applicant: **The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Public Consultation Process / Local Impact

1. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.

2. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

3. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. The identity of the 'Local Fisherman' has not been disclosed. If this person was speaking on behalf of the fishing community, this consultation should have been official and the name(s) released.

4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and misleading and should not be included in the report

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1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed.

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5. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.

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How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.,

From:
Sent: 08 September 2016 23:08
To: foreshore
Subject: Foreshore Lease Application Uimhir: - FS006566

Please confirm receipt of this individual submission referencing the above name.

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

1. According the visual assessment document “the magnitude of the visual impact is considered to be low” from R336 coast road at Doorath. I do not agree with this point as I believe that the magnitude of the proposed development will be much greater than what has been assessed and what has been on the site for the past 10 years. I would question the opinions of the visual assessment as it does not take proper account of resident’s point of view.
2. I have concerns of the impact that chemical and other liquid pollution may have on the local environment. This may adversely affect many recreational aspects of daily living in our local village.
3. I have concerns over the inaccuracies on the map attached to the application http://www.housing.gov.ie/sites/default/files/foreshore-applications/application-documents/marine_institute-spiddal-location_map_distances.pdf
My house along with many other houses which are on the southside of the road, directly facing the proposed development have been omitted.

FORESHORE LEASE APPLICATION - [housing.gov.ie](http://www.housing.gov.ie)

www.housing.gov.ie

galway bay marine and renewable energy test site foreshore lease application legend map
 scale (printed on a3) 1:20,000 not to be used for navigation

4. It is noted that the foreshore lease application has identified that the proposed development is expected to generate 50dB(A) of noise. I have grave concerns about the expected noise levels and I question the maximum noise level proposed in the application considering high winds we have endured in recent years. Also I cannot understand how a maximum noise level can be predicted when application does not provide clear guidance on devices to be tested on this site so far into the future.

5. I disagree with the term of the lease being applied for, I believe that no one can envisage what devices can be tested so far into the future and once the lease is approved the local community have no influence over the devices that could be added at the site.
6. I believe that I have been deprived of an Environmental Impact Statement and therefore do not have the information I need to assess the impact this development will have on my quality of life, my health and my wellbeing. This application does not provide any External Bodies Consultation information from an independent Environmental NGO to inform me or the Minister deciding on this application.
7. If this lease is granted I believe this will negatively impact on the value of my property for many reasons.

Yours sincerely,

From:
Sent: 08 September 2016 23:13
To: foreshore
Subject: Submission Letter - Foreshore Lease Application Number FS006566

Submission Letter:

Seolta ar son: / On behalf of:

Seoladh / Address:

GuthÆn / Tel / Riomhphost / Email:

DÆta / Date: 08/09/2016

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** Applicant: **The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Public Consultation Process / Local Impact

1. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.

2. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

3. In the environmental report, it stated 'Local Fisherman' was consulted with, in relation to this application. The identity of the 'Local Fisherman' has not been disclosed. If this person was speaking on behalf of the fishing community, this consultation should have been official and the name(s) released.

4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and misleading and should not be included in the report

Process

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed.

At the public consultation members of the public were advised that they are 3 independent projects and that at some stage, they may all be connected. The screening report specifically states that the test site will be connected to the cable. This is evidence of the poor consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for

2. Health & Safety in terms of light and noise pollution and visual assessments have been excluded in the screening report

Visual

1. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night-time in good weather conditions.)

2. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.

3. I do not believe light pollution has been adequately addressed in the screening report

4. Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November Sunday morning, looking into the low rising sun. In some of the montages, it is difficult to even see the barren landscape, which can be seen clearly from Spiddal.

5. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.

6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.

7. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.

8. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Irelands west coast is'

How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.,

Question for the Minister

Is the minister satisfied that the application and approval is fair, unbiased, accurate , complete and objective?

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie (Closing Date: Seol roimh: 09/09/2016)

Seolta ar son: / On behalf of:

Seoladh/Address:

Guthán / Tel/ ríomhphost /email:

Data: 08/09/2016

Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: “Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – Application No: FS006566 (Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

1. I, as a member of the community that this proposed development affects and therefore a stakeholder in this matter, am firmly of the view that the public consultation process has been wholly inadequate
2. I fear that project splitting has been used to keep the overall scale of the project below threshold levels that would have required more significant planning processes. As a stakeholder I demand that these fears be allayed through investigation before any further lease and/or licence and/or permission is granted
3. I wholly disagree that because there was an alternative energy test site located in this area in the previous years that this automatically means that it is suitable for a greatly increased scale of test facility in terms of area, the number of devices to be tested and the nature of devices to be tested
4. I utterly object to any project, permission, lease or licence that could in any way restrict access to any of the foreshore by any member of the public now or at any time in the future
5. I object to this project being located in a very highly visible location in a very scenic area on a very busy tourist route against the backdrop of an internationally acclaimed and protected landscape and habitat.

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie (Closing Date: Seol roimh: 09/09/2016)

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Data: 08/09/2016

Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: “Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – Application No: FS006566 (Should an extension to the closing date be granted I reserve the right to add further information to this submission)

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Seolta ar son: / On behalf of:

Seoladh/Address:

Guthán / Tel/ ríomhphost / email:

Data: 08/09/2016

Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: “Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – Application No: FS006566 (Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

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2. I fear that project splitting has been used to keep the overall scale of the project below threshold levels that would have required more significant planning processes. As a stakeholder I demand that these fears be allayed through investigation before any further lease and/or licence and/or permission is granted
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5. I object to this project being located in a very highly visible location in a very scenic area on a very busy tourist route against the backdrop of an internationally acclaimed and protected landscape and habitat.

From:
Sent: 08 September 2016 23:54
To: foreshore
Cc:
Subject: Application No: FS006566

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie (Closing Date: Seol roimh: 09/09/2016)

Seolta ar son:

Seoladh:

GuthÆn /Tel/ríomhphost /email

Data: 8œ MeÆn Fómhair 2016

Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: **“Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – Application No: FS006566** (Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

|1|Foreshore Lease Application (FS006566) Objection|

The proposed wind energy generating device, the proposed fixed work station and ancillary marking beacons would constitute a visual eyesore on Galway Bay. Galway Bay, world famous in song and a major attraction on The Wild Atlantic Way would be ruined. This would be detrimental to tourism in the region, - a sustainable industry that we should be promoting not destroying.

Situating such a development in the proposed location would also undermine the natural beauty and historical significance of nearby world important sites, namely the Burren and the Aran Islands.

The proposed development may have an adverse affect on the new burgeoning cruise ship business.

Whereas the initial development sought a license, this proposal is seeking a 35 year lease which in my opinion nearly equates with ownership. This period is too long as it allows the

current applicants to abdicate responsibility in the future. There are no guarantees about the type of device to be tested at any one time.

I am concerned for people who will be affected by this development. People who have invested heavily in their homes and who face the prospect of looking at and hearing these devices on a daily basis.

This foreshore proposal may affect the rights of existing foreshore rights holders to work on the seashore. Debris from storm damage to the development, that also occurred in the past, may be washed ashore.

This proposal interferes with fishing grounds used traditionally by fishermen.

The application process was flawed from the beginning. Local people were not made aware of this application until recently. The applicant was disingenuous in advertising their proposal placing notice in Salthill Garda station. This may fulfill requirements, but if they truly wished to engage with the community, a greater effort could have been made.

At a consultation meeting in June, prior to the initial deadline, representatives of the applicants lied to the public about advertising in local newspapers.

The environmental impact report furnished with the application was flawed. Obviously it was not based on the proposed site but a copy and paste effort as it concluded the specific area had no visual amenity. It also mentioned "Dublin bay prawns"

The graphical representations displayed at meetings bore no resemblance to what the reality would be and played down its visual impact.

No proper acoustic study was carried out. Therefore noise levels could actually be much higher than that mentioned in the application.

No effort was made to seek alternative sites. In this day and age stating that this site was the only option because of its natural attributes seems ridiculous. Other sites may be suitable and computer modelling should be able to recreate the desired test conditions.

There is no economic or social benefit for the people of An Spidéal.

An Spidéal has had its fair share of windmills. It is only fair that other places should shoulder this type of development.

Mise le meas,

To: The Foreshore Unit,
Department of the Environment, Community and
Local Government,
Newtown Road,
Wexford.

8 September 2016

Re Application for Foreshore Lease Reference No. FS 006566
(Wave, Tidal and Wind Test Site in Galway Bay)

Dear Sir or Madam,

I wish to object to the application for the above development in Galway Bay on the following grounds:

The scale and magnitude of the proposed devices to be located less than a mile from the coast will have a detrimental effect on the views of the Clare coastline and the Aran Islands from the coast road (R336) between Galway and Spiddal. This road has many viewing points of the Galway Bay and the Clare Hills. A windmill structure at 35 metres will be seen from up to 20 km away and will obstruct the views from vantage points and local beaches and walks.

To allow a facility of this magnitude to be constructed in Galway Bay would send a clear signal to other potential developers that, in principal, the Irish Foreshore Licencing Authority would allow energy-related developments in this part of the Bay. If this lease is granted, precedence will be established.

Tourism is a major part of the economy of South Connemara. Following the decimation of the fishing industry and small farms, tourism is the main indigenous source of employment in the area. This development will significantly impact on the visual amenity of Galway Bay for tourists. For its size, it is located too close to the coast. A windmill of 35 metres high should be at least 10 km from any coast that has important views which need to be preserved.

The proposed development will add to the lighting pollution, and will also include a red light for aviation on the windmill. Page 55 of the application states that there will be 'flashing lights at the Cardinal Markers'. The current markers at the existing site also have flashing lights. These can be seen from up to 10 km away. The lights flash approximately twice per second, which are more likely to trigger seizures and pose a hazard to sufferers of photosensitive epilepsy, comprising 3% of people with epilepsy (Epilepsy Foundation, <http://www.epilepsy.com/learn/triggers-seizures/photosensitivity-and-seizures>). They could also have a negative psychological impact as

they are present all of the time after dark. A reduction of the frequency of the flashes would be of help. I understand that this is the responsibility of the Commissioners of Irish Lights, but this is the only opportunity that the public have been formally given to voice opinions on these impacts.

According to the report, noise from the wind turbine will be audible from the coast. As there are few background noises along this rural coastline, it will be significant for people walking the local beaches and walkways, as well as those living along the coast.

The Developer should be asked to undertake an independent Environmental Impact Assessment to determine the overall impacts, as required by National and European legislation. The environmental report appended to the application is not independent and lacks the scope of an Environmental Impact Assessment.

At the public meetings, the Developer stated that some onshore facilities would also be developed. Some of these have not been applied for as yet. The overall development will therefore be greater than that outlined in this application.

It is hard to understand why a lease of 35 years duration is required for research purposes. Ten years should be adequate to determine whether a large number of devices are viable or not.

For these reasons I ask that you give serious consideration to the environmental impacts. As there is no appeal opportunity for objectors, a licence should not be granted if there is any significant negative environmental impact. I believe that the combination of negative impacts outweighs the positive benefits from the proposed test site at this location.

Yours faithfully,

Tag/Re: - **“Foreshore Lease Application to Construct an Offshore Electricity Generating Station” – FS006566**

Aighneacht mar gheall ar Foreshore Lease Application Uimhir: - **FS006566** - Iarratsóir: Foras na Mara.
Submission regarding Foreshore Lease Application Number: - **FS006566** - Applicant: The Marine Institute

Cinntigh le ríomh phost go bhfuarthas mo aighneacht aonair, ag déanamh tagairt don ainm thíos le do thoil.

Please confirm by email, receipt of this individual submission referencing the name below.

An Spidéal, Co. na Gaillimhe.

Ainm:

A chara,

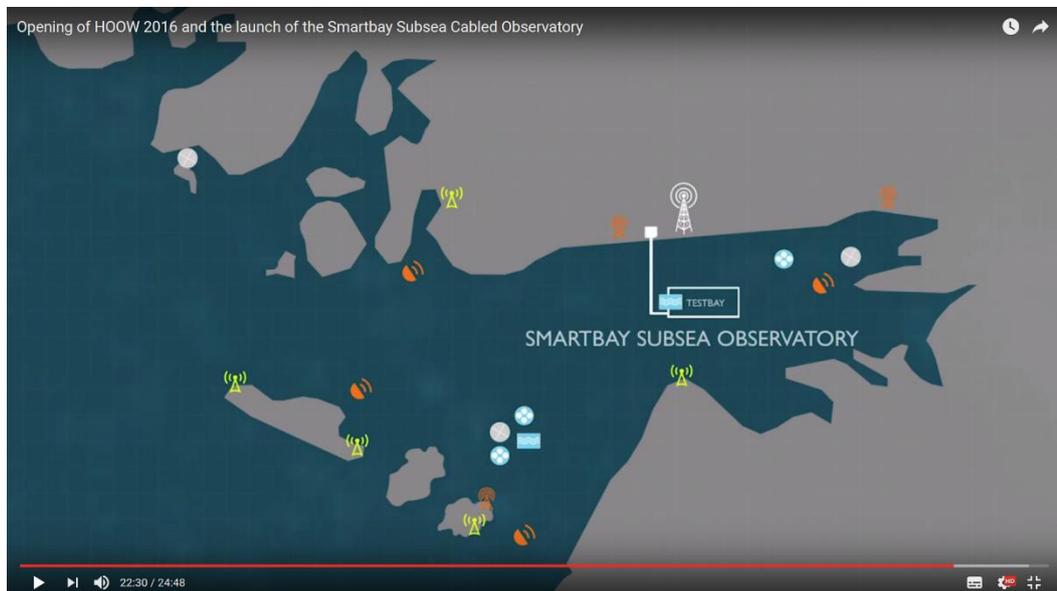
Tagraím don iarratas léas thuas, Foreshore Lease Application FS006566 agus tá mé go láidir ina choinne. Tá mé ag agóid ar na pointí a léirítear thíos:

I refer to the above Foreshore Lease Application FS006566 and I strongly object to the proposed development. I object on the points outlined below:

1. The consultation process was totally inadequate
 - a. Following public and individual requests for time to consider the proposed project when our Dáil representatives were available to us, at the last moment, the day public consultation was to end, the Minister extended the consultation process until 9th September, ignoring the many requests that the process would be extended into the next Dáil sitting, after 27th September.
 - b. The developer will not come to the area to meet with locals who still have questions; instead there is an ‘invitation’ from the applicant (Marine Institute). The conditions attached to the ‘invitation’ in terms of a maximum limit of three people per group and providing names and questions in advance unsatisfactory and questionable in this day and age.
 - c. Information has been ‘drip’ fed to the public; one thinks they have all the information and yet, without notification, more information appears on the website; (30/08/16 Screening Report appeared).
 - d. Notification of public meetings during January and June were not adequately advertised, and the written notification did not refer to an application regarding a 35 year Foreshore Lease Application – just an ‘information meeting’.
2. Could the Minister explain why all local and national stakeholders involved in Tourism have been excluded from the consultation process? An Spidéal relies on Coastal Tourism.
3. The application is to extend/renew the lease of an existing test site. The status of the Test Site at its present location is questionable – the process by which the original lease for the site was obtained in 2006 was much less rigorous than the

current inadequate process. Can the Minister explain why there was no environmental impact assessment for the original lease and how this impacts on the current application for an extension?

4. The screening process for EIA has excluded vital elements of the process –
 - a. Visual Landscape/Seascape Assessment has not been included; Galway Bay's UNESCO heritage site, the Burren and Cliffs of Moher, all excluded? This development will be seen 10km away, according to the Environmental Report submitted, thus it will be a blot on the seascape from the Galway and Clare coast line.
 - b. Marine Archaeology has not been screened, - ignoring local knowledge, reported to the Marine Archology Unit of the Department of AHRRG, and ignoring state recorded data of ship wrecks in the area.
 - c. The screening report contains errors in the data presented. Pollution has not been declared – Noise and Light, among others.
5. I still have not been presented with information on what the project will actually look or sound like, day or night. Visual Data presented in this regard was misleading and has not yet been corrected by the developer, who cannot, to date, identify a local 'coastal track' from where the visual data was collected. I have lived in the area for 10 years, and have no knowledge of this track, which leaves me now questioning if it even exists?
6. There is a very clear conflict of interest between the role of the Department in evaluating this application and the role of the same Department in promoting



the as yet unapproved site. At a recent Marine conference in Galway (3rd Our Ocean Wealth) the public conference programme included a slot for Minister Creed to launch the SmartBay Subsea Observatory (see above image from Conference presentation) even though this very Observatory is subject of this foreshore lease application which clearly has not yet been granted. Furthermore Minister Coveney and senior departmental civil servants were included on the list of conference speakers. It is not credible that the Department will impartially

assess this application after having very publicly launched the site at a conference run by the Marine institute which is the applicant. On this basis I object to this application.

7. The Planning and Development (Strategic Infrastructure) Act 2006 provides that developments that are strategic infrastructure and have an effect on the area of more than one planning authority may be subject to a specialised planning application to the Board (Bord Pleanala). I request that the current application be so processed.
8. This energy site is a project within the meaning of the EIA Directive and a plan/programme within the meaning of the SEA Directive and should therefore be subject to an assessment which complies with both Directives. Specifically, the SEA Directive requires the consideration of alternative sites. This has not occurred in this application and therefore the application should be rejected.
9. Under the EIA Directive a screening process including landscape and visual assessment is required. The visual assessment which is provided within the application does not meet the requirements under the Directive and is therefore not valid. On this basis I object to the application.
10. Noise and Light are pollutants. The test site will generate noise and light (particularly at night). My residence is one of the closest to the test site and the map provided in the application showing nearby residence does not even include my house so I am certain that the impact on nearby residences has not been accurately assessed. Furthermore the application does not include an assessment of the health impacts of any noise and light pollution on nearby residences. On that basis I object to the application.

Minister, I do not give my consent to this Foreshore Lease Application (FS006566).

Is mise,

From:
Sent: 09 September 2016 08:10
To: foreshore
Subject: Smartbay ocean energy test site.

Dear sirs,

I wish to object further to this development on the grounds that further independent and thorough archaeological investigation should be carried out on the area affected before any lease is granted.

Faithfully

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie (Closing Date: Seol roimh: 09/09/2016)

Seolta ar son: / On behalf of:

Seoladh/Address:

Guthán /Tel/ríomhphost /email:

Data: 9/09/2016

Please treat this submission as an individual submission and confirm receipt of this submission naming the individual above.

Submission regarding: "Foreshore Lease Application to Construct an Offshore Electricity Generating Station" – Application No: FS006566 (Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

HEALTH & SAFETY:

Call for The Precautionary Principle to be invoked, as set down by the UN OSPAR Convention: there are reasonable grounds for concern that the activities of this project may bring about hazards to human health, harm living resources and marine ecosystems, damage amenities and interfere with other legitimate uses of the sea; therefor, therefor I object to this development, I deny consent and call for consideration of alternative plans and that no development takes place until all the proper environmental assessment carried out, as per current law, to establish that NO possible harm is done to human health or to the sensitive marine ecosystem in Galway Bay.

- The screening application for the EIA is incomplete and contains inaccurate and misleading information, thus, possible significant effects on the environment, including HEALTH AND SAFETY issues, cannot have been SCREENED properly.
 - Pg21 states that no pollutants will be generated – NOISE & LIGHT are but some examples of pollutants produced at site that have not been screened at the site and have SIGNIFICANT effects on health & safety
 - Could the Minister explain how 'accidents' could be 'localised' on WATER in a marine environment; e.g. oil spill?

Possible risks mentioned in the environmental study done for this application:

- The risk to seals and other mammals colliding with devices on site – causing injury or death – calls for the Precautionary Principle – I reject this application and call for the precautionary principal
- No assessment of turbines and other devices under water –
- Is the Minister satisfied that the impact of 'yet to be invented' devices, - ¼ scale of infinity – can be assessed – please explain how?
- The test site SURROUNDED ON ALL SIDES BY NATURA areas of special conservation; areas LEFT/not declared in application (PG 22), HOW COULD THE effects on the environment have been assessed – please explain Minister?
- There is no mention of the impact the turbines & base trellises will have on the birds – Annex 1 Merlin is on this flightpath – Therefore, CALL FOR THE PRECAUTIONARY PRINCIPLE.
- Is the Grid connected? Conflicting information from the Minister and the developer – THEREFOR, HOW IS THE IMPACT OF THIS ASSESSED? The Minister says PROJECT IS GRIDDED CONNECTED, but the Marine Institute say it is not. TOO much confusion and misleading information.
- Q 23: Application already granted from Galway County Council in relation to Cable (electrical and data) connections (REF 13/947) – thus site connected to the grid. SEAI made previous applications to connect to the Grid – there questions remain unanswered.
- FAILURE TO DECLARE AND TO ASSESS OTHER DEVELOPMENTS IN THE BAY AREA, AS REQUIRED TO DO SO BY LAW – Port Development in Galway City has gone through planning stage – yet, it was declared as not having gone to planning in application documents. False information. Other Harbour developments excluded – Rossaveal Harbour? By law, the cumulative effects of ALL projects need to be assessed. Thus I reject this application.
- As the project involves a generator, Minister, how can the development produce 'no waste' (pg21 screening report)?

THE PROCESS

Lack of public participation in the decision making process – Could the Minister confirm that consultation involves more than sticking a notice up on a board or leaving a leaflet somewhere in public? Public involved too late – misleading or incorrect information as to who in the public was consulted - a sea of information /public consultation process described publically by politicians as 'a mess' - Object to the

IMPARTIAL way the Minister is involved in the process, stated in Dáil (17/7) he would like to see Galway Bay continue as a Test Bed - & he will be DECIDING the outcome– CONFLICT OF INTEREST

1. Little notification of public meeting; few notices, no attempt to notify stakeholders by email, social media or in the 'post'. Facebook / social media after June 14th meeting.
2. Photomontages misleading and inaccurate – do not show the extent of the development for the public to consider – Could the Minister explain to the public where the 'public coastal walkway' on one of the montages is located, as none of the locals are aware of such a walkway?
3. Notifications too vague & did not include reference to the fact that the meeting was in relation to a foreshore lease **application**.
4. Costal Tourism excluded from the consultation process as were other key stakeholders – could the Minister explain why no tourist organisation or Fáilte Ireland were included as prescribed bodies to be consulted in this process?
5. Untruths told at a public meeting (June 14) regarding which local stakeholders consulted – CSS named, yet, when checked, the club had not been consulted. This brings into question how the public could or should TRUST any information the developer supplies. Who is the one fisherman consulted?
6. Access to documents limited – local library not open fulltime. Garda Station in Salthill needs one to have transport into Galway – not easily accessible to all – and NO Gaelge version available until late in the process.
7. APPLICATION is still incomplete – information not available to public – still awaiting replies from those who were required to comment on the project, e.g. Birdwatch Ireland- misleading information on the application (exclusion zone and connection to the grid questions STILL remain unclear to the public – conflicting information given at meetings; still awaiting reply to our questions asked at the last meetings – Screening report just uploaded on August 22nd 2016!) Is the Minister satisfied that this is appropriate?
8. Incorrect information litters the application form; SACs missing; measurements of nearest dwellings incorrect ...
9. Other developments on Galway Bay NOT included in assessment, the cumulative impacts as required by law. Galway Port Development noted as not having applied for planning! Untrue – and ALL developments need to be included in environmental assessment.

LOCATION: I strongly object in order to protect our most iconic landscapes ... (Costal Tourism is the area's industry)

The proposed site forms part of an internationally significant landscape area; the Burren and UNESCO listed World Heritage Site and the Burren Global Geopark; How does the Minister explain that this element was not included in the assessment? Is he satisfied that this omission complies with current environment legislation at national and international levels?

- a. The Connemara landscape is one of the principal assets for tourism in County Galway. The proposed Site location would be a blot on Galway Bay's ICONIC Landscape – The Burren (idyllic – Auginish Island and castle / Black Head Lighthouse) across the bay; this proposed development on this SITE is COMPELEATLY out of character for the area;
- b. Contrary to Galway County Plan's objective to 'support and facilitate the wild Atlantic way in conjunction with stakeholders'
- c. On the WILD Atlantic Way – close to the shore and clearly visible from Barna to Spiddal on one of the top 5 drives in Galway as quoted in the Wild Atlantic Way – 'Coast Road into the Heart of the Gaeltacht.'
- d. The site is contrary to development allowed in the Galway County Development Plan:
 - i. The site is clearly visible while on the Galway County Scenic Route from Barna TO Baile an tSleibhe.
 - ii. The site is visible on the 'Galway County PROTECTED Focal Points and Views'
 - iii. The site is located in an area of High Sensitivity where development is curtailed
 - iv. Site located where wind-farm development 'not normally permissible area' in the Galway county plan
- e. The site is surrounded by sensitive areas; SACs and SPAs and NHA – from the Aran Islands, around Clare coast, inner Galway site Connemara Bog complex and the various protected Water areas in the Bay. Increased activity and potential accidents will impact negatively on the surrounding areas - Any accident; oil/chemical spills will be washed inshore, and in towards inner Galway bay, towards sensitive marine and bird life protected by law.
- f. Introduces NOISE pollution which was not adequately assessed in application reports, as discussed in public meeting on Aug 12. Still awaiting answer to public questions asked.
- g. Incorrect and dated maps – looks like no humans or animals live near the site!
- h. According to Sustainable Energy, there should be no generating devices allowed within a 5km distance from the shore – this proposed test site is 1.2km from shore- this is NOT a suitable location for this development.
- i. Although the Test Site have been in the site for 10 years, the site has been 'underused' – according to IWEDA (Irish wind energy development association) which is why people have not objected to its operation in the past. The proposed development brings VAST changes in site activities and visual effects.
- j. The location is too close to the shore; the public are losing the amenity of the bay.

SIZE:

- k. Project Splitting – The site is marked as 'Galway Bay Cabled Site' – thus, how can three planning applications be justified for this one site Minister? (Foreshore Cable License FS005751 / Onshore Station Galway County Council Planning Ref 13/947 and the current application) – split applications means that the size of the project is not apparent to stakeholders and has SERIOUS implications in terms of the environmental assessments necessary –(larger project entails more rigorous assessment – not done for this application) – thus environment at risk of potential damage; Is the Minister satisfied that this development ought not to be assessed as one project that includes the cable and shore-station?

- l. Suggestions of expansion in various reports which we don't have time to investigate, due to time constraints. Upgrading and expansion references suggest a larger size than that disclosed.
- m. Suggestions in application to PILING INTO THE SEA BED – suggests further expansion; piling not assessed
- n. Devices included in the application are NEARSHORE devices – again suggesting SIZE EXPANSION; Could the Minister explain how these relate to the site in question?
- o. Application includes every possible device, even includes devices “TO BE INVENTED YET” (ENVIRONMENTAL REPORT) SUGGESTION LARGER EXPANSION IN THE FUTURE (currently only one device at 4m allowed)
- p. PHOTOS of development suggest a smaller size; do not show all the infrastructure – photos are misleading and DECEPTIVE –they even manage to HIDE Co. Clare! Since the public cannot visualise the project – I object to this unknown development on the bay.

Yours sincerely,

From:
Sent: 09 September 2016 08:34
To: foreshore
Subject: Foreshore lease Application number FS006566

Foreshore lease Application number FS006566

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development.

I object on the points outlined below:

- I believe that the lease of 35 years is not reasonable as no one can predict what devices would be tested on the site so far into the future.
- I am concerned about the noise pollution/ visual impact of this site. Galway Bay is on one of the most scenic coastlines in Ireland and it will be destroyed if such a development is permitted.
- I object to the above lease as it will have an effect on the natural beauty of this renowned landscape and will also have a resultant impact on local tourism.

Sincerely

Submission made to: Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Rd, Wexford, Co. Wexford. Email: foreshore@environ.ie

Seolta ar son: / On behalf of: _____

Seoladh / Address: _____

Guthán / Tel / Riomhphost / Email: _____

Dáta / Date: _____

Please confirm receipt of this individual submission referencing the above name.

Submission regarding Foreshore Lease Application Number **FS006566** **Applicant: The Marine Institute**

Application: **“Foreshore Lease application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

Process

1. Why has the project been split into 3 smaller projects and the cumulative effect not properly assessed?

At the public consultation members of the public were advised that they are 3 independent projects and that at some stage, they may all be connected.

The screening report specifically states that the test site will be connected to the cable.

This is evidence of the poor consultation process and why it is difficult for the general public to fully understand what the real scope of the test site is for.

2. Local people and all humans have been excluded in the screening report

General – Public Consultation

1. There was no genuine effort to consult with the general public, and it is only through local community activity that the general public have been notified. Evidence of this can be confirmed by the several extensions given to the public consultation process.
2. The title of the application is very misleading and not consistent with the documents to support the application.

Application Title: Application for lease to construct an off shore electricity generating station

Other Titles: Marine and Renewable Energy Test Site

This is very misleading and difficult for the general public to understand what is actually included in the lease application.

3. In the environmental report, it stated ‘Local Fisherman’ was consulted with, in relation to this application. The identity of the ‘Local Fisherman’ has not been disclosed. If this person was speaking

on behalf of the fishing community, this consultation should have been official and the name(s) released.

4. The environmental report states that this development would bring employment and economic benefits to the local Spiddal community, specifically it states..

'the ocean energy test site is expected to stimulate the local economy and contribute to the vitality of the local community'.

There is no evidence to suggest that the test site will benefit the local Spiddal economy. The statement is vague and mis-leading and should not be included in the report

Visual

1. There was no realistic representation of all long-term and temporary infrastructures which could be on site - i.e. the three devices, during daylight and night-time in good weather conditions.)
2. There was no maximum size (in 3 dimensions) / colour / lighting details for all devices and infrastructure that will be located on the test site.
3. I do not believe light pollution has been adequately addressed in the screening report
4. Most of the photo montages look like they have been deliberately manipulated to make the wind turbine 'blend' in with the sea / view. The time / date for the photo montage was on a misty November Sunday morning, looking into the low rising sun. In some of the montages, it is difficult to even see the barren landscape, which can be seen clearly from Spiddal.
5. The Photo montage only included a single turbine, did not include the cardinal markers (at their correct size), the permanent sea station or any of the other devices that are likely to be co-located in the test site.
6. Based on the quality of the visualisation / montage provided, it is difficult for the local community to truly understand the impact of the test site.
7. Based on the quality of the visualisation / montage provided, it is difficult / near impossible for any people / bodies who have not visited the site, and are reliant on the documentation provided to make a true assessment of the visual impact of the proposed site.
8. I disagree with the following assessments made in the environmental report :

It states 'In this regard, it is considered that the section of coastline in question is not synonymous with the wild Atlantic to the degree that much of Ireland's west coast is'

How is this a valid statement? Galway bay is one of the most iconic sections of coastlines in Ireland.

It then goes on to state:

'This coastline therefore has an anthropogenic character and the continuing use of the Galway Bay Marine and Renewable Energy Test Site is not considered to significantly conflict with the seascape values associated with the northern portion of Galway Bay.'

The MI did not consider the southern portion of Galway Bay, and the Burren, and the impact to these views. In my opinion, this assessment loses all credibility when it totally ignores that this site will be in close proximity and within the views of the Burren and the Aran Islands. Instead of assessing these properly, they were ignored.

Even more alarming, when the visual assessments are discussed in detail, the report seems to focus on the Slieve Aughty mountains, approx. 40km away in the distance, as much as it does on the view of the immediate / close Burren and Aran Islands etc.

Therefore, I ask the minister to refuse to grant this application.

FS 006566 Foreshore Application Marine Institute

I am objecting on the grounds 'of its size and proximity to the coast' and 'the serious detrimental impact' it will have on our coastline, visual impact, safety of sea goers, boating, danger to birds and marine wildlife protected under EU environmental legislation and the impact it will have on our natural heritage assets, The whole manner/process this application was given to the public to understand/ and try make sense of was not done in the correct manner.

It will prove a particular eyesore to all, especially since this site was totally underutilised up to now, it will be a big shock to people to see this new proposed development on our bay.

Why destroy a section of our bay, when other countries are leading by example of having a buffer zone of no go areas around their coast line. We seem to always be 20 years behind other countries with this concept. This is typical of an Irish solution to an Irish problem.

There is no evidence of an EIS been carried out when this test site was first selected.

There is no evidence that alternative sites were looked at and totally/proper research carried out.

(It's a requirement that other sites be first investigated)

Ireland are yet again here breaking EU Directives

If allowed this development will fence in and industrialise a section of our coastline, significantly altering the character and quality of all the coastal 'views and prospects listed in 'Galway County Development Plan'. The danger to tourism is unquantifiable.

No alternative site was researched for suitability, and while the site in question has been there for over 10 years, it lay totally underutilised until now, with only a few small devices in place for short periods.

Development which degrades our coastline cannot be deemed to be sustainable. Other EU countries are protecting their coastlines. Ireland must do likewise.'

The whole of the Connemara Coastline is one of the most beautiful coastal areas of the world.

A planning permission for a house in along this coast can have 30+ planning conditions in order of protecting visual amenity, and many are refused planning permission for housing on visual or environmental grounds in Connemara while now a foreshore lease for industrial development in the same locality without any proper regard for the environment or the visual amenity.

Spiddal Story

One would first need to study all Marine Institute/Smart Bay/SEAI foreshore applications from 2006 to date in order to see the chain of links and mistakes/errors.

There are a lot of issues of great concerns

One been in the 'Grant of extension for 1 year to the existing 2006 licence' In this grant to approve extension in time also allows for other activities and extension to the area (Size) of the existing site, this new document 'Grant of extension' goes way beyond the existing licence, and contains four times more documents that was in the original

Surely by law a grant of extension on time to a lease that to run out should be just that and not allow for more development with the lease

The vetting committee for the Dept. of Envy. on this lease application also consist of three people (experts) from the Marine Institute, and the Chief Executive of Irish Lights (who is also on the board of Smart Bay), and various other influential people. The minister for Marine who stated public that he is in favour of this development, has the final word on granting this licence.

How can one be judge and jury of your own case, which is the case here? Even if they were to stand back from this application, they have too much influence on this application. It should be totally validated and judged by independent EU experts.

This undermines the whole process here, and lacks faith and trust in our public bodies to to the right things, with other some much influence.

The site in the wrong location

The documentation and environment reports included in this application come from either the Marine Institute themselves or other groups which have more to gain by approving of this application than not. All the reporting is very vague and bias towards the approval of this licence.

The location of these wind turbines, and devices on protected habitat close to protected coastal landscapes, is out of line with good international practice, reflecting the inadequate regulation of the sector. These structures and devices are too big and too close to shore. The average distance from shore of these devices is 1.2 km. The average distance from shore of wind farms under construction in Europe is 30km according to the European Wind Energy Association. The visual impact of these devices (which the fotomontage gives a false image) on adjoining coastal landscapes is a key consideration in all EU maritime countries, with countries such as Germany introducing 22km buffer zones around their coasts to protect visual amenity . This application gives no consideration to these major aspects which reflects the dominance of development interests.

This application (including previous) is been advanced under the outdated Foreshore Act 1933 which gives the Minister for the Environment sole authority to permit construction in Irish waters. There is no system of appeal against the Minister's decision. This adds to undermine public confidence in the way our cost lines are governed. New legislation is needed

.

There is alot of local community and extened concern at the manner in which this lease is been aproached, and with no cost benefit analysis and little community consultation in line with the complex and volume of the lease application documents. There is no structure of legal, technical or environmental expert advice available (willingly) to the general concerned public, and without this assistance it very much undermines their observation and comments to this lease application.

Finally,.

If/when this lease application will be granted under the terms of this lease,

- it will allow for a wide range of unknown device both in size and height to be constructed.

- The whole shoreline from high water mark to the far (outer end) side of the test site will be in control by the Marine Institute, which in effect can control access to land anywhere between Furbo and Spiddal
 - There is allowance for a power generating structure which can be connected to the national grid
 - What impacts, will all these devices on on marine species.
 - What happens if these devices break their moorings and drift across shipping and other sea going users or coming ashore (this has already happened on three occasions
 - Landscapes/seascapes and areas of high scenic amenity Scope: It is proposed to assess the potential visual impacts of the installation of offshore energy devices located in all areas on landscapes /seascapes and areas of high scenic amenity value.
 - The Galway City Draft Development Plan states that “ Galway Bay, is an integral part of the aesthetic landscape and culture of the city”, which has many benefits
-
- There is a substantial and serious issue with project splitting in regard to the proposed development which forms one element of a much larger development

There is no proper indication of size/location on site of Sea Station (Eye sore, Noise, Visual, close to shore line, etc.)

Basically in a nutshell the way this lease is drawn up, it gives Marine Institute freedom to do what they want.

This licence if granted would give the Marine Institute an open licence to do whatever they want over a 35-year period. It will kill some wildlife/mammals and very possible put human life at danger of the 35 year lease period. There is no form of risk worth this. As its in area of high activity both human and wildlife. This type of renewal energy testing on Galway Bay goes against all of whats good about the environment and shall end up with blue energy testing destroying the bay. Its development and money driven, without proper screening and care to environment so close to land

Some day in the future, the younger people will read this email and get to understand as to what they see out there and how it unfolded

I ask on the minister to refuse grant of this licence

From:
Sent: 09 September 2016 09:27
To: foreshore
Subject: Submission Re Application FS006566 for a Foreshore Lease for the Construction of an Offshore Electricity Generating Station

9th Sept 2016

Dear sir / Madam,

I am objecting to the granting of application FS006566, “Application for a Foreshore lease for the construction of an Offshore Electricity Generating Station” for the following reasons;

- Firstly I have been deprived of an Environmental Impact Statement and as a result I do not have the information I require to assess the impact this development will have on the community and the wellbeing of the local and visiting tourists. Therefore I request that an Environmental Impact Study is conducted and circulated to the community before a decision is made with regards to this application.
- The impacts of the proposed development on the sensitive area of Galway Bay, its legally protected species and Habitats, have not been Appropriately Assessed as required by law.
- I have not been properly informed and I have not been consulted and included in the decision making process with regard to this application as required under the Aarhus Convention.
- This project appears to be part of a larger development including Application FS005751, Application FS006611 and Galway County Council Application 13/947. The intention of the EIA Directive is that no project likely to have significant effects on the environment should be exempt and project splitting cannot be used to circumvent the intention of the Directive
- Galway bay is known worldwide and with the Wild Atlantic Way bringing more tourists to the area which generates much needed jobs and income locally I am at a loss to understand why the impact on tourism has not been considered in this application. I am requesting that this is addressed before a decision is made with regards to this application
- No consideration has been given to the fact that Galway (City and County) has been selected as the European Capital of Culture for 2020. This title is worth an estimated €170 million in terms of funding and tourism. It is also potentially worth several

thousand new jobs and the expected number of tourists is estimated to be in the region of 500,000. One of the primary reasons why Galway was selected as European Capital of Culture for 2020 is that *“the drama of its coastline from Salthill Prom to the wilds of Connemara is unmatched and always excites”* and that the Aran Islands per the National Geographic are *“One of the world’s top island destinations. That this feeling, this authenticity has survived the modern world, is nothing short of miraculous.”* To date the coast line and bay has been unspoilt and the views of the Aran Islands, Clare Coast including the world famous Cliffs of Moher are a major attraction for tourists which visit from all over the world. Therefore I request that the impact on tourism is fully evaluated and taken into consideration before a decision is made with regards to this application.

- Finally I do not understand why a 35 year lease is being requested / considered for this application. If granted it will destroy the beauty of Galway Bay forever, have a serious impact on tourism, employment and the life of the local residents who live in the area or tourists that visit or pass through the area. I have lived in this area all my life and am the 8th generation of my family to do so, I regularly fish from the rocks directly opposite where this development is planned for and am passing on the traditions that were handed down to me to my children therefore I request that this application is refused so that Galway bay is there for my children (and their children) to enjoy and treasure as I and my family have done down through the generations.

Therefore I am requesting that the Minister refuses granting of this application.

I am also requesting that you acknowledge receipt of this submission and keep me informed of progress / decision that are made in regards to this application.

Yours Sincerely,

Submission made to: : Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Road, Wexford, Co. Wexford or foreshore@housing.gov.ie

Seolta ar son: Comhlacht Forbartha an Spidéil teo

Seoladh: An Spidéal ,Co na Gaillimhe

Guthán /ríomhphost : 091 553666, anspideal1@gmail.com Data: 09/09/16

Please confirm receipt of this submission.

Submission regarding:

Foreshore Lease application for the testing of prototype wind, wave and tidal energy devices

Location:

Galway Bay Marine and Renewable Energy Test Site, An Spideal Co na Gaillimhe
Application No: FS006566

A chara,

Déanann muid tagairt ar an iarratas i gcóir léas imeall trá ag Páirc ,An Spidéal Co. na Gaillimhe .Is Comhlacht Forbartha a Spidéil atá aitheanta mar guth ionadaithe ar son pobail an cheantar seo(in a bhfuil an suíomh tástála lonnaithe).D'fhreastal baill agus bainisteoir an chomhlachta ar na 3 cruinniú poiblí eagraithe ag Foras na Mara agus cruinniú eagraithe ag roinnt cónaitheoirí ón ceantar agus cairde leo. Chuaigh muid i dteagmháil go minic le Foras na Mara le linn ón Próiseas seo ó Éanair seo caite go dtí anois maidir le ceistanna a d'ardaigh an pobail linn sa oifig agus ag na 4 cruinniú sa cheantar. Chuaigh muid i dteagmháil freisin le roinnt saineolaithe neamhspleách ar chúrsaí Mara agus chas muid le Foras na Mara sa Spidéal arís ar an 1/9/16.

Bunaithe ar chuile Chomhfhreagrais agus Teagmháil atá déanta againn níl an Comhlacht Forbartha in aghaidh léas nua a bhronnadh do Foras na Mara ach bheadh imní orainn ar fad an léas molta de 35 bhliain, tréimhse ró fhada dar linn agus fhéadfaidh a lán rudaí tarlú le linn 35 bliain agus is léir nach raibh an Pobail ar an eolas faoin cineál trealamh atá á tástáil ar an suíomh sa chuan go dtí seo. Ni raibh mórán gearáin ón Pobail le linn tréimhse an léas 10 bliain atá rithe amach ó tús 2016.Tá an pobail imníoch faoi léas níos faide agus tástáil treallamh do tréimhse chomh fada sin uainn (suas go 35Bl). Má ceadaíonn an Roinn Comhshaol léas nua ba cheart go mbeadh coinníoll sa léas de próiseas foirmiúil teagmhála curtha i gcríoch ó Foras na Mara leis an Pobail in a mbeidh seisiún eolais bliantúil do na sprioc grúpaí(iascairí lucht báid srl.) agus bileoga eolais seolta ag seoltaí poist sa cheantar ag léiriú an trealamh atá le tástáil le linn an céad bliain eile den léas ceadaithe ag an Roinn.

Mise le meas ar son an Chomhlacht Forbartha an Spidéil teo.: Aodán mac Donncha 09/09/16

From:
Sent: 09 September 2016 10:03
To: foreshore
Subject: Re: Marine Institute - Galway Bay Marine and Renewable Energy
Test Site - File ref. FS 006566

Ref:FS006566

Further to my original submission of the 2nd August 2016 it has since come to my notice that this site will be used for multi purposes such as aquaculture and the testing of various chemicals . I object to the creation of a long term lease which leaves open the type of activities that can be carried out without any pre notice or ability to object . I find that the Marine Institute has not been forthcoming in their application about the various areas that the site will be used for and only put forward what they consider to be the more acceptable use i.e. dealing with renewable energy.

It is one more reason why only a 10 year lease should be given if at all and there must be strict terms and conditions applied and the uses of the site must be made public and licensed. I object to the use of the site for testing in regard to aquaculture as it would be an open site and allow pathogens/ viruses/ pesticides to cause diseases and infect the wild fish outside the site area. Any testing that could be harmful (I am reluctant to accept MI word when dealing with the aquaculture industry) should only be carried out in a laboratory where there would be the necessary controls.

Regards

On Wed, Aug 3, 2016 at 11:29 AM, foreshore <foreshore@housing.gov.ie> wrote:

Dear ,

I wish to acknowledge receipt of your submission of 01/08/2016 and note the contents therein.

Yours sincerely,

Patrick O'Neill

Marine Planning – Foreshore Section (MPFS)

From:
Sent: 01 August 2016 10:55
To: foreshore
Subject: Foreshore Lease Application No: FS006566

Submission made to: Marine Planning and Foreshore Section, Department of the Environment, Community and Local Government, Newtown Rd, Wexford, Co. Wexford. Email: foreshore@environ.ie.

Seolta ar son: / On behalf of: _

Seoladh/Address_

Guth/En /Tel/ríomhphost

Data:

01.08.16_____

Please confirm receipt of this submission naming the individual above.

Submission regarding Foreshore Lease Application Number: - **FS006566** Applicant:
The Marine Institute

Application: **“Foreshore Lease Application to Construct an Offshore Electricity Generating Station”**

(Should an extension to the closing date be granted I reserve the right to add further information to this submission.)

A chara,

I refer to the above Foreshore Lease Application and **strongly object** to the proposed development. I object on the points outlined below:

1. I object to the length of the lease as 35 years is too long and would suggest that 10 years is sufficient. Because another area around the coast was given 35 years or that it corresponds to government programme is not relevant.

2. I object to the Marine Institute, a government body, funded by government, applying to Government for a decision on an application and the Minister making the decision. As with other foreshore matters like aquaculture licences, there is no independent adjudication and the decision should not be left up to one person.
3. I object to the possibility of 1 or 2 or 3 large trial models (¼ scale) taking up all the space in the proposed area and the inability of anyone to stop it/them being put in place.
4. I object to not being considered a stakeholder and not being advised of this proposal from the start as I operate an angling business in _____ and would not want the recovering stocks of salmon and sea trout to be jeopardised.
5. I object to the lack of information in the EIS dealing with the movement of inland fish (salmon and sea trout) through the site and the risk of these trial and unknown devices having an effect on and on the movement of these fish from and to the nearby river systems.
6. Because of the lack of curtailment on the size and type of devices that could be used I object to Galway Bay, as a major tourist attraction, being used for industrial purposes and would ask that a body be established to manage the bay and take account of all developments being proposed.

Regards

Sent from Windows Mail

Is faoi ræn agus chun æsÆide an tØ nÓan aonÆn atÆ luaite leis, a sheoltar an ríomhphost seo agus aon comhad atÆ nasctha leis. MÆ bhfuair tœ an ríomhphost seo trí earrÆid, dØan teagmhÆil le bhainisteoir an chÓrais.

Deimhnítear leis an bhfo-nÓa seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvórais chun vórais ríomhaire a aimsiœ.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been swept by anti-virus software for the presence of computer viruses.

From:
Sent: 09 September 2016 11:57
To: foreshore
Subject: Foreshore lease Application number FS006566

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. As a frequent visitor this area of extraordinary natural beauty, I would like to object to the development for the following reasons:

I am particularly concerned that an Environmental Impact Study which assesses the noise pollution and visual impact of this site has not been submitted. I believe that this impact may be considerable and the Marine Institute have not addressed this possibility in their research to date.

This development poses a serious threat to the natural beauty of this important piece of coastline. Galway bay is renowned for its scenic appeal and the impact of this development will damage that reputation. The tourism industry is an important mainstay of the community in this area and care should be taken not to undermine the beauty of this scenic coastline which is a starting point for many visitors to the Wild Atlantic Way.

Yours Faithfully,



Fáilte Ireland

National Tourism Development Authority

Marine Planning and Foreshore Section,
Department of the Housing, Planning, Community and Local Government,
Newtown Road,
Wexford,
Co. Wexford

Date: 9th September 2016

Ref: FS006566 Foreshore Lease Application for the testing of prototype wind, wave and tidal energy devices, Spiddal, Co. Galway

A Chara,

I refer to the above named Foreshore Lease Application in Galway Bay. Fáilte Ireland commissioned an assessment of the proposed Galway Bay Marine and Renewable Energy Test Site at Spiddal, Co. Galway, to determine the potential impacts of the proposed development on tourism amenity. Please see attached the findings of the full assessment which we now ask you to consider when evaluating this application.

It is the policy of Fáilte Ireland to support the development of sustainable and renewable energy generation facilities at appropriate locations and in accordance with proper planning and development. In this instance it is considered that, although the proposed development will change the nature and character of the receiving environment – namely in relation to changed views of Galway Bay, these impacts are not significantly different from the existing activities which take place in this working bay. It is also considered that the majority of visitors to the area will view the development intermittently while travelling along the R336 coast road. In this context it is considered that there is unlikely to be a significant negative impact on tourism in the area arising from the current proposal.

However, the proposed Foreshore Lease application is for a period of 35 years. There is a general concern that the duration of the lease and of the installations at this test facility may be a precursor to a permanent commercial site. There is also a concern that the 35 year duration may provide a precedent for additional turbines to be installed during the lifetime of the lease. As outlined in the attached assessment, the visual impact arising from the installation of one turbine would be significantly different to that arising from the installation of two, three or ten turbines.

We therefore recommend that should a foreshore lease be granted for this development that the following conditions be attached:

- a clear condition indicating that the test site does not provide a precedent for a future commercial installation;
- and that only one floating wind turbine will be permitted on the site for testing at any one time.

Should you have any queries on this please do not hesitate to contact me.

Yours Sincerely,

A handwritten signature in black ink that reads "Mary Stack." The signature is written in a cursive style with a large loop at the end of the word "Stack".

Mary Stack

Environment and Planning, Fáilte Ireland

Foreshore Reference: FS 006566

Since the existing Site has been totally underutilised until now, with just two devices ever been tested for a short period of time. The remainder of time over the past 10 years nothing been in operational there except for the four small Cardinal Markers. There are questions over the selection of this site in the first place and its compliance with EIS's and site selection process.

The proposed Test Site with such a poor history and most of the research to date is either self-composed EIS or farmed out to selective companies that may tailor the reporting to suit the client's needs. Most of the reporting to date been desk based.

It's only fair and practical (and legal under EU) that a proper full screening, EIS's and compliance with EU Directives should be insisted on this site before assessing this application.

Reason for independent full EU EIS and compliance to Directives to be conducted first:

- ✓ Duration of lease (35 years, way too long)
- ✓ Public Health/Safety
- ✓ Location of Site in a highly visual and sensitive area
- ✓ Contamination of water
- ✓ Testing of unknown devices in the future
- ✓ Project Splitting (including Cable licence)
- ✓ Type of licence seeking (Offshore Electricity Generation Station)
- ✓ Proper consideration to Wildlife/Mammals
- ✓ Noise
- ✓ Visual Effects
- ✓ Care to Environment
- ✓ Overall proper plan for the management and care of Galway Bay
- ✓ Wild Atlantic Way

I recommend that the licence be refused until such proper Environment Impact Studies are carried out by independent European bodies

Also the Community should have a strong input on all studies and not just as last minute observation

It is community amenity

SeamusOg O'Ceidigh

**Commentary on the Galway Bay Marine and Renewable Energy
Test Site at Spiddal, Co. Galway and the potential impacts on
Tourism Amenity**

Foreshore Lease Application: Reference Number FS006566

**Location of Development: Galway Bay Marine and Renewable Energy Test Site
Spiddal, Co. Galway.**

Prepared for: Fáilte Ireland, 88-95 Amiens Street, Dublin 1

By: AOS Planning, 2nd Floor, The Courtyard, 25 Great Strand Street, Dublin 1

8th September 2016



Table of Contents

1.0	Introduction	3
1.1	Methodology Applied	3
2.0	The Proposed Development	3
3.0	The Subject Site	5
3.1	Site Location.....	5
3.2	Existing Environment	6
4.0	Planning Context for the Assessment of this Proposal	7
4.1	National Renewable Energy Policy	7
4.2	The Offshore Renewable Energy Development Plan, 2014	8
4.3	National and Regional Plans	8
5.0	Tourism and Renewable Energy – Marine Renewable Energy	10
5.1	The Tourism Profile of the Receiving Environment	10
5.2	Wind Energy Developments and the Tourism Sector.....	11
6.0	Our Assessment of Likely Impacts on Tourism.....	13
6.1	Installation Related Impacts	13
6.2	Impacts associated with the changing profile of energy generation in the County and Country	14
6.3	Impacts arising from the operational stage of the development.....	15
7.0	Conclusions	17
	Appendix A Assessment of Likely Landscape and Visual Impact.....	18

1.0 Introduction

AOS Planning has been appointed by Fáilte Ireland to review the application for a Foreshore Lease, pursuant to Section 19 of the Foreshore Act 1933, by the Marine Institute. The purpose of this report is to assess the significance of any impacts on the tourism amenity of the local and wider areas. In carrying out this assessment, we have evaluated the information included in the application submitted by the Applicant, The Marine Institute, to the Minister for Housing, Planning, Community and Local Government. This includes the application form, the Marine Safety Statement and the Environmental Report, all maps and Appendices. In addition, related documents on tourism amenity and tourist attitudes to renewable energy developments have been considered in this assessment.

1.1 Methodology Applied

This assessment has been prepared based on a desk-top review of the application documentation, prevailing policy guidance for the area, policy guidance for the sector and an in-depth working knowledge of position papers and attitude studies prepared by Fáilte Ireland.

The desktop assessment concluded that due to the nature of the proposed development and the potential impact on the tourism amenity of the Galway Bay area, it was prudent to carry out a site visit to fully assess the impacts of the development proposed in the Foreshore lease application.

2.0 The Proposed Development

The Marine institute is applying for a Foreshore Lease for a Marine and Renewable Energy Test Site. The proposal is for an upgrade to the existing ¼ scale wave energy test site located offshore of Spiddal, Co. Galway and will provide developers and researchers with a cabled and a leased area in which to test and demonstrate their prototype ocean energy converters and related technologies. The proposed development will be located within the area of the existing 37 hectare test site.

The application provides for an upgrade of infrastructure to improve the services offered to end users. The following list details the proposed long term deployments at the site:

- upgrade cardinal marks to allow for safe navigation;
- a databuoy to provide wave measurements;
- buoys for testing marine technologies and scientific sensors;
- a 'SeaStation' which will provide power to, and dissipate power from, ocean energy devices as well as provide data communications to shore;
- an acoustic array for monitoring underwater sound;
- interlocking modular gravity base(s);
- a variety of scientific sensors and instruments;
- cables which will connect to instruments, sensors and energy devices;

The proposed upgrade of the site will enable periodic deployments of up to three individual devices, of the following types, for test and evaluation purposes for a maximum period of 18 months:

- surface ocean energy converters;
- sub-surface ocean converters;
- seabed ocean energy converters;
- prototype floating wind turbine;
- novel marine technologies and scientific sensors.

It is proposed that the upgraded test site will operate for up to 35 years, with devices on site intermittently throughout the year. The test site has been structured into three berths, designed to only allow a maximum of three prototype ocean energy converters to be deployed and tested at any one time. The fourth berth will be for the Cabled Observatory and related projects.

Devices will most likely be deployed at the test site during the months of April to September for periods ranging from weeks to months. The maximum duration of testing for any one device at the test site will be 18 months. Devices can be periodically removed for adjustments and maintenance purposes. The actual deployment of devices will likely occur over a series of two or three day periods. Initially the anchoring and moorings will be deployed at the test site. The device will subsequently be towed to the test site and the device secured to the moorings.

Decommissioning of the test site leasehold area will be subject to agreement between the Marine Institute / SEAI, the relevant Minister and other appropriate authorities and will be in line with relevant legislation and industry best practice at the time.

An Environmental Report, Marine Safety Statement and other documents have been submitted as part of this Foreshore Lease application.

3.0 The Subject Site

3.1 Site Location

The Galway Bay Marine and Renewable Energy Test Site is located at the existing ¼ scale ocean energy test site on the north side of Galway Bay. As illustrated in *figure 1* below, the test site is located 2.4 km southeast of the village of Spiddal. Spiddal is located 19 km west of Galway City offshore of Spiddal, Co. Galway.

Galway Bay is located on the west coast of Ireland between County Galway and the Burren in County Clare. The Bay is approximately 50km long and ranges from approximately 10km to 30km in breadth. The Aran Islands are to the west of the Bay and there are numerous small islands within the Bay itself.

The area of the Galway Bay Marine and Renewable Energy Test Site is currently 37 hectares, located in water depths of 21-24 metres. The test site extends approximately 670 metres east to west and approximately 560 metres north to south. The test site area is demarcated by four cardinal marks, one at each corner. The proposed works will take place within the existing site area.

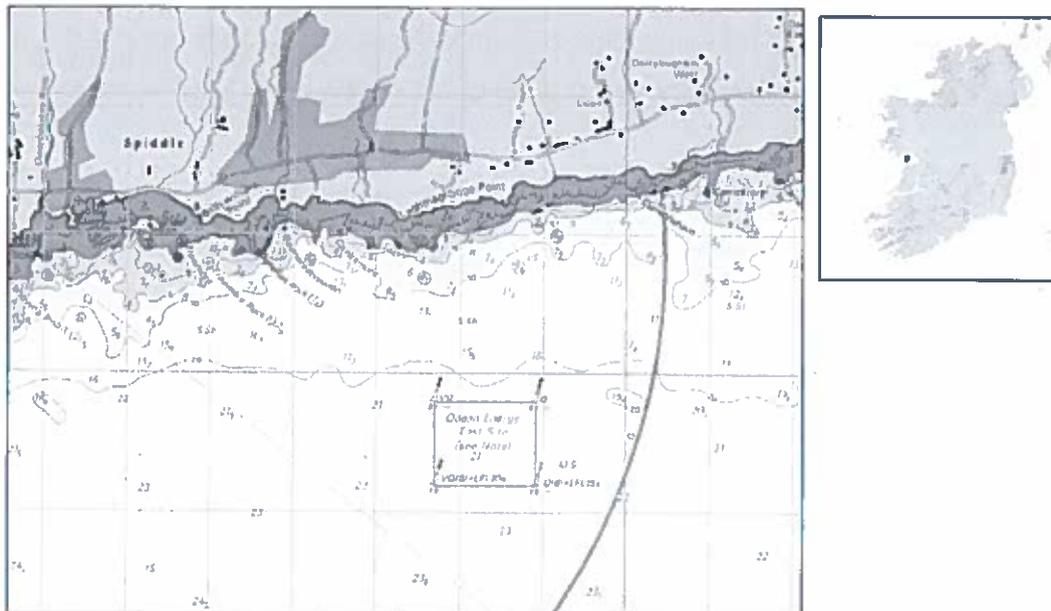


Figure 1: Extract from the Environmental Statement showing site location

3.2 Existing Environment

The existing area is characterised by a bay surrounded by the Galway coastline to the north and the Clare coastline to the south. The mouth of the bay is sheltered by the three Aran Islands and opens out to the Atlantic Ocean. Spiddal harbour and pier are located less than 3km to the west. The R336 runs east to west along the coast from Galway City to Connemara. The area is typically a diverse coastal environment. The proposed location is not within any designated or protected sites under EU or Irish legislation. Black Head- Poulsallagh SAC and NHA is located approximately 7.5km to the south, the Galway Bay Complex SAC and NHA and the Inner Galway Bay SPA are both located approximately 9km to the east. The existing use at the location of the proposed Galway Bay Marine and Renewable Energy Test Site Test Site has been the ¼ Scale Wave Energy Test Site since 2007. The Environmental Report Submitted with the application has regard to the impacts and mitigations of the proposed project and the cumulative impacts that may occur if it is permitted.

4.0 Planning Context for the Assessment of this Proposal

4.1 National Renewable Energy Policy

In 2007 the European Union (EU) agreed new climate and energy targets to be reached by 2020. These were based on a 20% reduction in greenhouse gas emissions, 20% energy efficiency and 20% of the EU's energy consumption from renewable sources.

The subsequent **EU Renewable Energy Directive 2009/28/EC** (repealing Directive 2001/77/EC and Directive 2003/30/EC) set individual and legally binding targets on each Member State for increasing the level of renewable energy across the European Union in order to achieve the targets set in 2007. Under that Directive, Ireland's target is that by 2020, 16% of all energy (heat, transport and electricity) consumed will be from renewable sources.

The **White Paper on Energy, 2007 – 2020** sets out our National commitments to the accelerated development of the renewable energy sector. The White Paper established national targets for the production of energy from renewable sources, with a target for 2020 of 33%, which was further increased to 40% in the 2009 Carbon Budget.

The **National Renewable Energy Action Plan, 2010 (NREAP)** sets out how Ireland will meet the overall target of 16% as set out under Directive 2009/28/EC. It notes that this will be broadly made up of 12% heat from renewable sources (RES-H), 10% transport from renewable sources (RES-T) and 42.5% electricity from renewable sources (RES-E).

The **Strategy for Renewable Energy, 2012 – 2020** sets out strategic goals and specific actions to maximise the economic potential of the renewable energy sector in Ireland. It states that the Government will take action to support delivery of the 40% target for renewable energy through the Grid 3 Grid Connection (GATE) Processes operated by

ESB Networks. **The National Climate Change Strategy, 2007 – 2012** sets out further commitments to the development of the RE sector.

4.2 The Offshore Renewable Energy Development Plan, 2014

The **Offshore Renewable Energy Development Plan, 2014 (OREDP)** identifies the opportunity for the sustainable development of Ireland's offshore renewable energy resources for increasing indigenous production of renewable electricity, thereby contributing to reductions in our greenhouse gas emissions, improving the security of our energy supply and creating jobs in the green economy. The OREDP sets out key principles, policy actions and enablers for delivery of Ireland's potential in this area.

4.3 National and Regional Plans

The **National Spatial Strategy, 2002 – 2020 (NSS)** provides a context for strategic long-term development in the state. The NSS includes objectives in relation to the development of key infrastructure, including the energy sector.

The **Regional Planning Guidelines for the West Region 2010 - 2022** sets out regional planning policies for the West Region. It outlines the regions potential for the generation of electricity from sustainable renewable resources.

4.4 Galway County Development Plan, 2015 – 2021

The **Galway County Development Plan, 2015 – 2021** recognises that County Galway has, *'huge potential for the development of wind, solar, biomass, geothermal, hydro and wave energy. The wave and wind resources along the west coast are among the richest in Europe.'* The Council supports the enhancement of infrastructure at appropriate coastal areas for the promotion of ocean energy (also referred to as blue energy - wave, tidal and offshore wind) and with the Galway Marine Institute in the development of its

'SmartBay Project' (which includes marine observation, advanced technology sensor and data management systems, communication projects and R&D).

Section 7.4.4 of the County Development Plan states that due to its location on the Atlantic coast, '*County Galway has great opportunity to harness the potential of wave and tidal energy.*'

There are a number of policies outlined in the County Development Plan which support the development of sustainable renewable energy resources. These include:

Sustainable Energy Policy ER 1 Promote the implementation of the Government's White Paper Delivering a Sustainable Energy Future for Ireland, Energy Policy Framework 2007-2020 (or any updated or superseding document) over the lifetime of the Galway County Development Plan 2015-2021 to assist in ensuring that the energy efficiency target is realised by 2020 from renewable sources.

Objective ER 4 Support and facilitate the sustainable development and use of appropriate renewable energy resources and associated infrastructure within the County, including;

- Wind Energy;
- Wave/Tidal Energy;
- Hydro-Power;
- Solar Energy;
- Bio-Energy;
- Geo-Thermal;
- Combined Heat Power (CHP);
- Heat Energy Distribution (such as District Heating/Cooling Systems); and
- Other renewable energy sources, as appropriate and in line with national guidelines for sustainable development.

5.0 Tourism and Renewable Energy – Marine Renewable Energy

5.1 The Tourism Profile of the Receiving Environment

Tourism is a significant economic activity in County Galway. The tourism product in the County is diverse, comprising outdoor activities – such as marine leisure, island attractions, bogland, heritage parks, equestrian activities, fishing, golfing, swimming, surfing, camping and walking trails; cultural features – such as castles, abbeys, events and festivals, eco-Tourism, and the hospitality of Galway’s vibrant City, county towns and villages. The County’s landscape and natural environment is a key part of the tourism product.

The Wild Atlantic Way is an initiative developed by Fáilte Ireland and implemented in partnership with other stakeholders (such as Local Authorities), with the aim of providing a touring route/ proposition of scale from Cork to Donegal which will attract tourists to key destinations and attractions along the west coast. The enhancement and protection of the landscape character along the Way is a key objective of stakeholders involved in this project.

Tourism amenities close to the subject site are concentrated in the settlements of Galway City, Barna, Furbogh and Spiddal along the northern coast road (R336) of Galway Bay. This is a Gaeltacht area. The area is a popular tourist area hosting numerous hotels, B&B’s, restaurants and Pubs. There is also a craft village in Spiddal. As well as forming part of the Wild Atlantic Way, the R336 provides access to the Aran Islands via ferry service at Rossaveel and an aerodrome at Inverin.

There are piers located at Spiddal and Barna, where fishing is a part of the historic and current way of life. Galway Bay is also a popular day trip location for tour operators and in particular for water based activities such as diving, sailing, windsurfing and fishing.

5.2 Energy Developments and the Tourism Sector

Fáilte Ireland recognises the importance of developing the State's renewable energy sector. The Agency has been extremely supportive of the preparation and adoption of Wind Energy Strategies and Renewable Energy Strategies across the Country.

While supporting the industry, the position of the Authority is informed by research on visitor attitudes. In 2007 and 2012 Fáilte Ireland commissioned independent studies looking at visitor attitudes to wind farms and developments in the Republic of Ireland. This provides us with information on which we can base an informed assessment of the likely impact of a development, such as that proposed, on the tourism potential of the area.

In carrying out the study holidaymakers at various tourist office and visitor attractions were surveyed. Insofar as possible, the 2012 study surveyed a similar size and mix of domestic and overseas visitors as the 2007 study. This allows for a meaningful comparison between the two sets of findings to observe changes in values and judgements over time.

The key findings relate to windfarm developments and electricity pylons and cables. While the current proposal is not for a windfarm per se, the overall attitude of visitors to various energy installations can be used to provide some context for their potential attitudes to the proposed development. The key findings of the 2012 study are summarised as follows:

- The 2007 research found that the majority of visitors felt that wind farms had either no impact or a positive impact on their holiday experience. While the 2012 research was comparable, some results were more polarised – with increased positive and negative responses and less neutral responses (e.g. views of impact

of wind farms on landscape). It is notable that those interviewed who did not see a wind farm held more negative opinions of them than those who did.

- Awareness of the existence of wind farms was higher among domestic visitors. As in 2007, most wind farms were seen at a distance from the car in 2012. However, 2012 saw an increase in the number of farm sightings.
- Opinions on housing, mobile phone masts and electricity steel pylons were collected from participants to contrast against opinions on wind farms. Housing fared best with a majority positive or no impact response, followed by wind farms.
- More visitors saw turbines at closer proximity than on the horizon in 2012, versus 2007. Mountain moorland areas were the most prevalent sites where wind farms were seen. Sightings at coastal areas have reduced significantly.
- The majority of participants favour small groups of large turbines over large groups of small turbines. When given a choice of groups of 5 or 25 turbines or 2 clusters of 10, the site with 5 turbines scored most positively or neutrally in 2012, as in 2007.
- Seventy-one per cent state that wind farms have either a positive or 'no impact' on their likelihood to visit Ireland, while just 24% are averse, leaving 5% saying 'it depends'. There has been an increase in 'no impact' views between 2007 and 2012, while negative views have remained the same and positive views have decreased. Within results, there is higher positivity among the younger age groups, those on city breaks and those holidaying in the west.

- In terms of wind farms being proposed near views from popular hotels and accommodation, nearly 4 in 10 respondents thought this would negatively impact on their holiday experience.

Most respondents conclude that the possibility of more wind farms existing in Ireland in the future will not impact on their decision to visit again. However, it is important to register the marked move from a positive towards a 'no impact' opinion. The research suggests that wind farms should be constructed with large turbines, but in small numbers, to offset their size.

While the current proposal does not involve a wind farm, but one single turbine, it is not entirely comparable to the survey statistics above. However, the principal of the potential impact of any such development applies and it can be concluded that the development proposed would not be expected to have a negative impact on the visitors' experience.

6.0 Our Assessment of Likely Impacts on Tourism

From a tourism perspective, the key potential impacts arising from a successful application for the Foreshore Lease for the proposed project are likely to be:

- Installation related impacts;
- Impacts associated with the changing profile of energy generation in the County and Country; and
- Visual impacts arising during the operational stage of the development.

6.1 Installation Related Impacts

As with any offshore operation, there will be a number of environmental impacts during installation and removal of various components. The most relevant of these to tourism are noise and visual impacts. These impacts are temporary impacts arising directly from the installation and removal of various components of the project. The Environmental Screening Report which accompanies the application documentation indicates that

during installation sound emissions would be caused by the operation of vessels and any cranes used for deployments and also at touchdown of various components into the seabed. It is anticipated that the magnitude of noise emissions from vessels and cranes would be similar to those from the normal operation of fishing vessels passing through Galway Bay. This activity is a common feature of the Bay. The magnitude of any additional potential impact would be considered slight.

The total number of marine renewable energy devices deployed at the site at any one time will be three and will be limited to the area of the site. The potential noise related impacts associated with vessel operations and the deployment of moorings or anchors would be limited and as indicated in the Environmental Report would be limited to a number of hours duration. The Environmental Report indicates that devices will most likely be deployed to the site during the months of April to September. The actual deployment of devices will likely occur over a series of two to three day periods. With a maximum of three devices on site at any one time and testing durations of up to 18 months, it is anticipated that the frequency of deployments will not be significant.

As indicated in the lease application the Galway bay Marine and Renewable Energy Test Site will have no land side components. There will be some minor traffic impact however. During the operational phase of the test site, traffic to Spiddal pier is estimated to increase by two to four vehicles per week. During the decommissioning phase of a device, there is likely to be a minor increase in use of the new pier at Spiddal for short periods. It is not anticipated that the proposal will give rise to any significant impacts on local traffic movement.

6.2 Impacts associated with the changing profile of energy generation in the County and Country

As outlined in the Section 3 of the Environmental Report, the technology to harness wave energy resource is still at a development and testing stage and no commercial full

scale device is yet in operation. Ireland is in a unique position with regard to developing this new industry. The Marine and Renewable Energy Test Site in Galway bay will support the delivery of Government and EU policy. The impact of increased renewable energy generation in the County and in the development of new renewable energy generating technologies for Ireland is considered positive.

6.3 Impacts arising from the operational stage of the development.

The site is located in the seascape of Galway bay, which is along the Wild Atlantic Way route. It is considered that the most significant impact arising during the operational stage of the proposed project will be of a visual nature. In particular, the array of different structures may appear slightly anomalous to visitors who are unaware of the sites' purpose. It is indicated in the Environmental Report that by way of mitigation the Marine Institute intends to provide an interpretive installation on the shoreline (most likely at Spiddal), which provides information about the various marine renewable technologies and the purpose of the site for testing such devices.

It is anticipated that visitors to the area will find genuine interest in the test facility and that any visual ambiguity is likely to be removed when information is provided by the site. The site itself may in fact prove to be an attraction in its own right.

The *Landscape and Visual Impact Assessment* of the proposed development which accompanies this report as **Appendix A**, deals with the visual assessment of the proposed project in greater detail. It indicates that the proposed development will be intermittently visible along portions of the R336 coastal road, from portions of local roads which spur off that road. It will also be visible from some buildings including holiday homes and the dwellings of residents in the area. There are limited locations along the road from which visitors will be stopped to view the Bay. These include Spiddal Pier, Gleninagh Pier, and a number of beach areas. It is anticipated that the

majority of visitors to the area will view the development intermittently from their car / bus as they travel along the R336 coast road.

There is a level of ambiguity surrounding the description of the devices to be deployed at the test site. In particular in relation to the prototype floating wind turbine. The description of the proposed upgrade of the site in the Environmental Report states that there will be periodic deployments of up to three individual devices for test and evaluation purposes for periods of a maximum of 18 months. The devices are listed as: surface ocean energy converter; sub-surface ocean energy converters; seabed ocean energy converters; prototype floating wind turbines; and novel marine technologies and scientific sensors. It is not clear from reading this whether this allows for one of each type of device at a time or three of one type of device at a time.

The Seascape and Visual Assessment that accompanies the Environmental Report at Appendix 8 provides a description of the development in section 1.1.2 of the report and states that it will consist of, among other devices, 1 no. floating wind turbine. It also states that wave energy converters will be in place for periods ranging 12-18 months and that the wind turbine will be in place for periods ranging 2-3 months. All of the photomontages accompanying the Environmental Report as Appendix 9, indicate that there will only be one turbine present at any time.

It is not clear whether the proposed deployment of up to three individual devices includes for one or up to three floating wind turbines at any one time. The visual impact of three floating turbines is significantly different to that of one floating turbine.

It is recommended that there is a clear condition attached to the lease indicating that only one floating wind turbine be permitted at any one time.

7.0 Conclusions

It is the policy of Fáilte Ireland to support the development of sustainable and renewable energy generation facilities at appropriate locations and in accordance with proper planning and development. In this instance it is considered that, although the proposed development will change the nature and character of the receiving environment – namely in relation to changed views of Galway Bay, these impacts are not significantly different from the existing activities which take place in this working bay. It is also considered that the majority of visitors to the area will view the development intermittently while travelling along the R336 coast road. In this context it is considered that there is unlikely to be a significant negative impact on tourism in the area arising from the current proposal.

However, the proposed Foreshore Lease application is for a period of 35 years. There is a general concern that the duration of the lease and of the installations at this test facility may be a precursor to a permanent commercial site. There is also a concern that the 35 year duration may provide a precedent for additional turbines to be installed during the lifetime of the lease. As previously stated, the visual impact arising from the installation of one turbine would be significantly different to that arising from the installation of two, three or ten turbines.

It is recommended that a submission of this report is made to the Foreshore Unit of the Department of Housing, Planning, Community and Local Government outlining the Authorities assessment of the proposal and recommending that a number of conditions be attached to the grant of a Foreshore Lease. These would include:

- a clear condition indicating that the test site does not provide a precedent for a future commercial installation;
- and that only one floating wind turbine will be permitted on the site for testing at any one time.

APPENDIX A –

Assessment of likely Landscape and Visual Impact of the Galway Bay Marine and Renewable Energy Test Site at Spiddal, Co. Galway - having particular regard to the potential impacts on Tourism Amenity

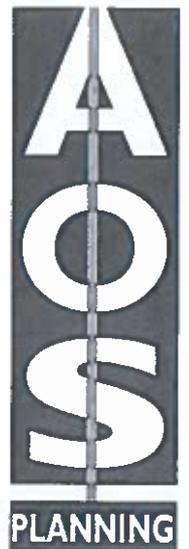
Foreshore Lease Application: Reference Number FS006566

**Location of Development: Galway Bay Marine and Renewable Energy Test Site
Spiddal, Co. Galway.**

Prepared for: Fáilte Ireland, 88-95 Amiens Street, Dublin 1

By: AOS Planning, 2nd Floor, The Courtyard, 25 Great Strand Street, Dublin 1

8th September 2016



Introduction

An assessment of the potential landscape and visual impact of the proposed Galway Bay Renewable Energy Test Site has been carried as part of a Commentary on the Galway Bay Marine and Renewable Energy Test Site at Spiddal, Co. Galway and the potential impacts on Tourism Amenity.

Reference Documents

This assessment is based upon a report entitled '*Seascape and Visual Impact Assessment – Proposed Galway Bay Marine Energy Test facility*' – Spiddal, Co. Galway by Macroworks, January 2016 – prepared by Mr Richard Barker MLA, MILI, Principle Landscape Architect at Macroworks Ltd.

The assessment was also made using 5 photomontages supplied as part of the Environmental Report.

Following a site visit on August 23rd 2016 this landscape and Visual Impact report was prepared by a landscape architect¹ – who is a specialist in impact assessment and landscape and visual impact assessment.

The Proposed Development

The Marine institute is applying for a Foreshore Lease for a Marine and Renewable Energy Test Site. [Further details of the proposed development are contained within the main AOS Report - *Commentary on the Galway Bay Marine and Renewable Energy Test Site at Spiddal, Co. Galway and the potential impacts on Tourism Amenity*]. The proposal is for an upgrade to the existing ¼ scale wave energy test site located offshore of Spiddal, Co. Galway and will provide developers and researchers with a cabled and a leased area in which to test and demonstrate their prototype ocean energy converters and related technologies. The proposed development will be located within the area of the existing 37 hectare test site.

The following list details the proposed long term deployments at the site:

- upgrade cardinal marks to allow for safe navigation (approx. 3m diameter x 7m);
- a databuoy to provide wave measurements;
- buoys for testing marine technologies and scientific sensors;
- a 'SeaStation' which will provide power to, and dissipate power from, ocean energy devices as well as provide data communications to shore;
- an acoustic array for monitoring underwater sound;
- interlocking modular gravity base(s);
- a variety of scientific sensors and instruments;
- cables which will connect to instruments, sensors and energy.

The proposed upgrade of the site will enable periodic deployments of up to three individual devices, of the following types, for test and evaluation purposes for a maximum period of 18 months:

- surface ocean energy converters;

¹ Conor Skehan – Dip Arch, B. Arch Sc, MLA, MILI, MRIA, MIPI, MIAIA, MIEMA

- sub-surface ocean converters;
- seabed ocean energy converters;
- prototype floating wind turbine;
- novel marine technologies and scientific sensors.

There appears to be some confusion in the public mind about the extent of the proposed development – particularly about the number of prototype floating wind turbines to be deployed. There appears to be a widely held view that three such floating turbines will be erected [see photograph below from poster by local objectors]



Figure 1 image within a poster erected by local protesters – indicating a belief that three turbines will be deployed.

The receiving environment

The Galway Bay Marine and Renewable Energy Test Site is located on the north side of Galway Bay. As illustrated in *figure 1 and figure 2* below, the test site is located 2.4 km southeast of the village of Spiddal - located 19 km west of Galway City offshore of Spiddal, Co. Galway.

The test site area is demarcated by four cardinal marks, one at each corner. The proposed works will take place within the existing site area. [Further details of the proposed development are contained within the main AOS Report - *Commentary on the Galway Bay Marine and Renewable Energy Test Site at Spiddal, Co. Galway and the potential impacts on Tourism Amenity*].



Figure 1: Extract from the Environmental Statement showing site location



Existing Environment



The existing area is characterised by a bay surrounded by the Galway coastline to the north and the Clare coastline to the south. The mouth of the bay is sheltered by the three Aran Islands and opens out to the Atlantic Ocean. Spiddal harbour and pier are located less than 3km to the west. The R336 runs east to west along the coast from Galway City to Connemara. The area is typically a diverse coastal environment.

The coast is a settled and much-altered landscape that contains areas of relatively dense residential development – with associated services and infrastructure. It also contains local amenities – such as beaches and walks – as well as infrastructure – including an existing major windfarm on elevated lands to the north.

There is an established pattern of movements of sea-going vessels in the immediate area – for leisure, fishing, ferries – as well as the movements of larger vessels within the bay.

The existing use at the location of the proposed Galway Bay Marine and Renewable Energy Test Site has been the 1/4 Scale Wave Energy Test Site since 2007.



Image 1: A typical road-side view across the site of the proposed development from the R336



Image 2 a view from the shore near Spiddal toward the site of the proposed development

I



Image 3 a view from the Barr na curragh beach near Furbo.

Likely Landscape and Visual Effects

This assessment does not duplicate the review of the existing designations and viewpoints – these are comprehensively covered in the ‘*Seascape and Visual Impact Assessment*’ which accompanied the application.

Instead this examines the effects on the narrower basis of the likely effects on potential tourism resources in the immediate vicinity.

The applicant’s Seascape and Visual Impact Assessment has provided the technical analysis – including photomontage – to confirm that at distances beyond 2km the impact ‘falls away quickly to slight and imperceptible’. This assessment uses standard techniques and these conclusions appear to be consistent and reasonable.

Tourism Resources

There are a number of potentially significant tourism receptors in the area

- The R336 – which forms part of the Wild Atlantic Way²
- Other roads, walks and associated parking areas
- Places of potential visitor congregation – beaches, piers, walks, attractions and shops
- Recreational and Catering facilities – cafes, restaurants,
- Accommodation – including hotels, guest houses and holiday homes

Visitors experience the landscape in two principle ways;

- I. Moving - either as moving passengers in buses, cars, occasionally in boats or as walkers.
- II. Static - from places of congregation or accommodation.

Moving Views

There are few direct views towards the development site from much of the R 336 between Furbo and Spiddal because the road is set back from the shore and the intervening fields are occupied by hedgerows, and field boundaries. The views that do exist within 2 km – such as Image 1 – are intermittent or only available from field gates. At these locations the proposed development constitutes a small part of a larger view. Thus the magnitude of effect, in terms of extent or duration, will be medium to low.

Static views

Views from settlements at or near a 2km distance – such as Image 2 and 3 - are, similarly, few and partial and affect very few tourism assets. Thus for these locations the magnitude of effect, in terms of extent or duration, will be medium to low.

² The three nearest Discovery Points along this section of the Wild Atlantic Way are Tra na gCeann, Seancheibh an Spideal Aerfort Connamara

Conclusion

The proposed development will be intermittently visible along portions of the R336 coastal road, from portions of local roads off that road. It will also be visible from some buildings including holiday homes and the dwellings of residents in the area. It will be visible from some local amenities- such as Spiddal Pier, Gleninagh Pier, and a number of beach areas.

In all of these instances the views will be distant and part of a settled landscape and a much used seascape.

The character of the area – is of development and use – both onshore and off shore. The appearance will be generally consistent with the scale and character caused by the passage of marine vessels that are common in the area.

The change of appearance will be classified as 'Slight' and 'Not Significant' – i.e an effect which causes noticeable, but neutral, changes - ie within normal bounds of variation - in the character of the environment but without significant consequences. [see definitions of effects following]

Appendix 1 – assessment standards from the EPA Revised Guidelines On The Information To Be Contained In Environmental Impact Statements Draft September 2015

<p>Quality of Effects</p> <p>It is important to inform the non-specialist reader whether an effect is positive, negative or neutral</p>	<p>Positive Effects A change which improves the quality of the environment (for example, by increasing species diversity; or the improving reproductive capacity of an ecosystem, or removing nuisances or improving amenities).</p>
	<p>Neutral Effects No effects or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.</p>
	<p>Negative/adverse Effects A change which reduces the quality of the environment (for example, lessening species diversity or diminishing the reproductive capacity of an ecosystem; or damaging health or property or by causing nuisance).</p>
<p>Describing the Significance of Effects</p> <p>“Significance’ is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful</p>	<p>Imperceptible An effect capable of measurement but without significant consequences.</p>
	<p>Not significant An effect which causes noticeable³ changes in the character of the environment but without significant consequences.</p>
	<p>Slight Effects An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.</p>
	<p>Moderate Effects An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.</p>
	<p>Significant Effects An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.</p>
	<p>Very Significant An effect which, by its character, magnitude, duration or intensity significantly alters the majority of a sensitive aspect of the environment.</p>
	<p>Profound Effects An effect which obliterates sensitive characteristics</p>

Table of categories of significance showing that the effect is of a ‘Neutral’ quality and a ‘Slight’ degree of effect.

³ Capable of being detected but not necessarily significant.

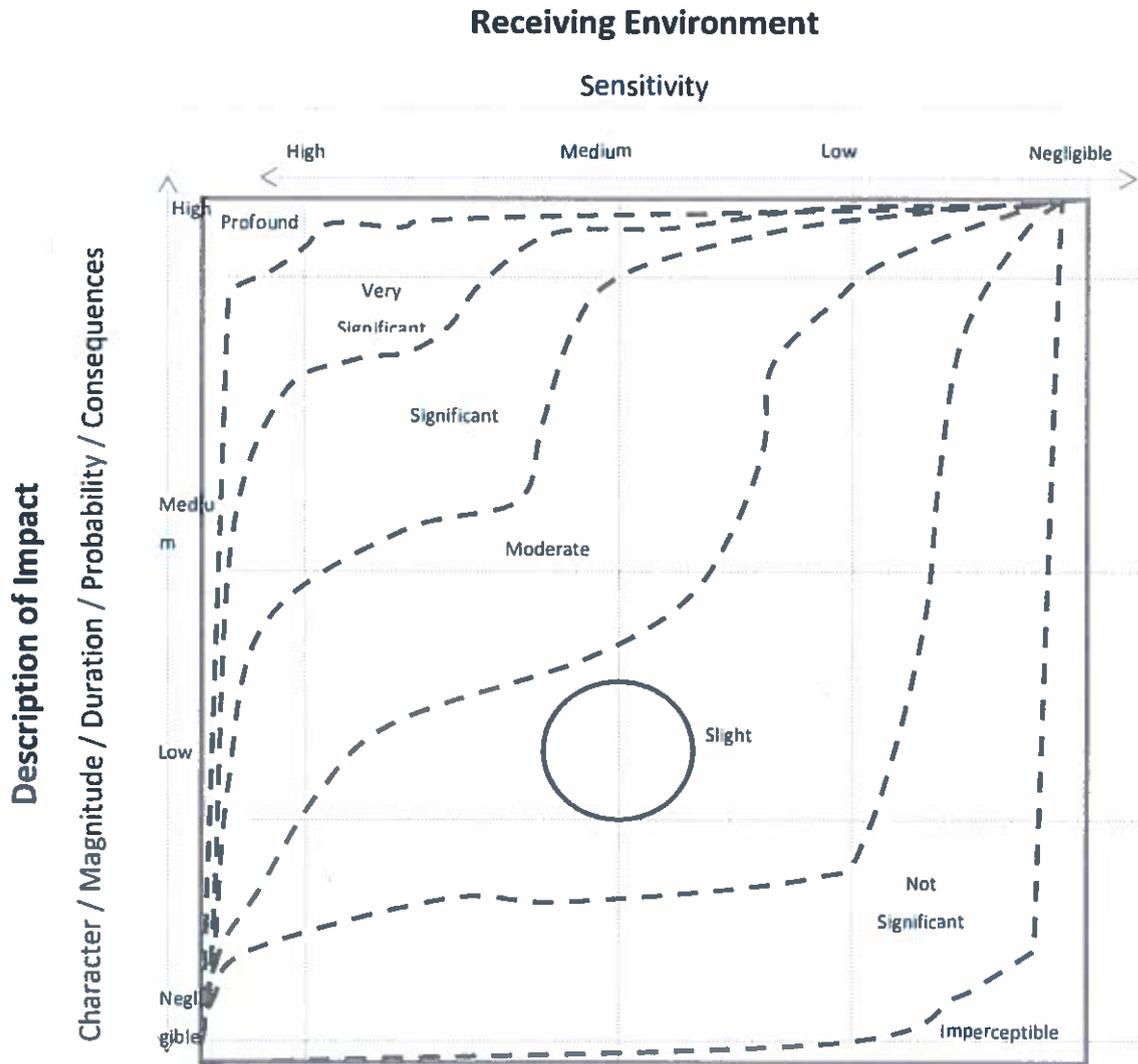


Diagram of significance of effect – showing the proposed development having a low to medium impact on a receiving environment of medium significance – this results in a classification of the impacts as 'Slight' [red circle]

From:
Sent: 09 September 2016 14:23
To: foreshore
Subject: Planning Application FS 006566

I live in Spiddal Co. Galway.

I wish to object to the above planning application on the following grounds.

1. Not enough information has been given to me on the proposed usage of the site.
2. I am not aware of what safeguards are in place to restrict alterations of usage during the 35 year term.
3. I cannot find evidence that an EIS survey has been carried out on the site and its connections to shore as a whole.
5. Terms such as "device" seem to have different meanings and need to be more accurately defined.

From:
Sent: 09 September 2016 14:24
To: foreshore
Subject: Nature

Please do not disturb Galway bay, and destroy its natural beauty.

Sent from my iPa

From:
Sent: 09 September 2016 14:34
To: foreshore
Subject: Foreshore lease Application number FS006566
Attachments: marine_institute-spiddal-location_map_distances.pdf

A chara,

I refer to the above Foreshore Lease Application and strongly object to the proposed development. I object on the points outlined below:

I'm local. I'm from . I'm presently renting in SPiddal for the last 7 years, as I can't get planning permission, because the area which I want to live in, is in a SAC, (just on the cusp of the map) and on a possible route of the new road t Ros a mhíl. Tat planning was subject to an EIS! Also that is less than 2km from the coastline, where the application above is proposed. and no EIS there!!!!

I love my home area.

I love the view.

I love the freedom we had as children, to wander close to shore, to fish etc.

That freedom and beauty is being taken away from the locals and their children.

1.

Firstly the map provided, to show the area, was completely out of date, My parents home, which was built circa **1935, is not on the map.**

http://www.housing.gov.ie/sites/default/files/foreshore-applications/application-documents/marine_institute-spiddal-location_map_distances.pdf

(see attached file)

IT would appear on the map that there are not many houses in the near vicinity, which in fact there are hundreds. Its misleading!!

- I believe that the lease of 35 years is not reasonable as no one can predict what devices would be tested on the site so far in future.

I believe that there could be a health risk involved with any of these devices, and that It is very close to a high enough populated area. As these health risks might only arise, after these devices are tested, It is not fair to put such devices so close to the shore/ populated area.

As studies are still being conducted in this area, I find unfair to subject locals to this, without certainly to their health.

2.

Our wildlife is so important to the local people. I have seen so many dead birds, beneath the wind mills, which are located to north of this project, Moycullen Road. unfortunately, i didnt have my camera the last time i visited, to send a photo with this appeal. I could only imagine that sea animal could also get caught in any of the device, if the devices are on the seabed, and it would be upsetting, to all, if these dead carcasses would land ashore, like the birds are around the windmills on the moycullen road. The area has large shoals of mackerel, pollock etc. What will happen to this year migration? Studies done on this? I don't see enough of research done on this.

There are birds ,flora /fauna native to this area only, these are at risk! No adequate reports included.

3.

I am concerned about the noise pollution/ visual impact of this site. I believe that inadequate research has been done as the Marine Institute has submitted an environmental report; I believe an **Environmental Impact Statement**, (EIS) should be provided with their application. I'm surprised, considerably that the area is in a Special Area of Conservation, that the EIS wasn't provided or deemed necessary.

4.

- Galway Bay is on one of the most scenic coastline in Ireland and it will be destroyed if such an development will be allowed to go ahead.

I can't fathom, how the government would consider ruining a very important part of the Wild Atlantic Way! Its is mentioned in so many tourist books, websites, etc an example of which is on this website;

<https://www.authenticireland.com/connemara-8-things-to-do/>

"Here are our top picks and tips:

1. Do the Ultimate Connemara Drive

Day 1: Starting in Galway City head west on the R336 towards Spiddal and beyond. **There are fine views across Galway Bay to the Burren in north Clare on your left.**

I would believe that the fine views, would be ruined by the devices.

5.

I object to the above lease as it will have an effect on the landscape along this area which is renowned for its natural beauty and is of great importance to our tourism industry.

Such a long lease, without knowledge of what devices, is unrealistic and unfair.

6 .

The Aarhus Convention is a law that requires the government to encourage meaningful public participation in decision-making for environmental development such as that being proposed for Galway Bay. In this case, we believe this burden has not been met for many reasons, including the following:

- There was no meaningful notification of the public meetings. The notifications that were given were vague as to what was involved. Locals that live beside the development were not directly notified. Tourism and environmental groups were not notified, nor were they asked to make an observation regarding the development. Not all of the stakeholders, for example, Bird Watch Ireland have made their submissions to date so we do not know what their opinions are.
- None of the information was initially available in the Irish language despite the development being located in the Gaeltacht.

- The locations where information was available is not normally accessed by interested parties - the Garda Station in Salthill, the Spiddal and Galway Public Library. At no time were there posters, leaflets, flyers, etc. distributed to local homes, schools, shops, restaurants, GAA clubs, etc. The Spiddal Library is only open part-time and the other 2 locations are located in Galway which require transport.
- The Convention requires public participation in decision-making regarding such issues but at no point in this process were the public asked to participate, rather they were simply fed particular information that did not give the whole picture of what was involved. The government has not been straightforward and has misled the public at the meetings that they did hold, implying that there was only going to be one wind turbine in the bay when, in fact, there will be up to four varying devices on the bay at any time.
- Photomontages are misleading and inaccurate – they do not show the extent of the development for the public to consider – one mere wind turbine was shown in the Bay from a distance on a misty day with no clear view out the Bay - no vision of what the sea station or other potential devices may look like.
- The application was submitted on February 11th, 2016. Yet, the first newspaper notice wasn't until the middle of May, 2016, over 3 months later, with just about a month to make a submission. The applications involved in this process are extremely lengthy and technical and the timeline was unfair and harsh. After the first public meeting in June that the public were aware of, the deadline was extended to July 1st, 2016 and later extended to August, 2016. It took until July 21st, 2016 for another meeting where a significant number of people attended. The meeting was cut short before people were finished asking questions and the Marine Institute refused to hold another public meeting. The deadline was extended to September 9th, 2016. The Marine Institute only allowed people to come to their location to have a meeting and only in groups of 3 people thereafter. This is not open, meaningful public consultation. The screening report was only uploaded on August 22nd, 2016, yet we are supposed to review this within 2 weeks!
- It was further pushedback, at the final hour! Why the cloak and dagger! Where is transparency.

7.

Other Potential Locations. No other locations were considered anywhere in Ireland for this project, as confirmed by the Marine Institute.

Why Not?

8.

Impartiality of Minister Coveney to Make A Final Decision on this Application. Minister Coveney initialised this entire plan with the EU and various Irish entities and has repeatedly publicly declared his full support for this development. How can the Minister claim he is impartial as the final decision-maker? Transparency is paramount to any public project.

Please, reconsider . At least do an EIS!

Look at other remote locations, more suited as a test site.

A test site, so close to a populated area is NOT the best policy.

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