

Minister Eoghan Murphy T.D.  
Department of Housing, Planning  
and Local Government  
Custom House  
Custom House Quay  
Dublin 1

16<sup>th</sup> July 2019

**Re: Foreshore applications for investigation works for windfarms and cable laying**

Dear Minister Murphy,

In my capacity as Chair of the National Inshore Fisheries Forum I am contacting you to highlight the recent planning applications for site investigation works to assess the suitability of areas for Windfarms and for cable laying (that has begun in Dublin Bay) without consultation with the Inshore Fisheries Sector.

The applications I refer to are as follow:

- **FS006982** Energia Application for site investigation Licence for windfarm off Helvick head.
- **FS006983** SSE Renewables Celtic Sea.
- **FS006973** SSE Renewables Braymore Point
- **Marine Notice 20 of 2019** Rockabill subsea Telecommunications cable installation works -, issued on the day **after** the survey started)

To give you some background the National Inshore Fisheries Forum was established in 2014 to facilitate fishermen using small vessels to participate in the management of fisheries within 6 nautical miles of the coast. The National Inshore Fisheries Forum is supported by six Regional Inshore Fisheries Forums who bring forward regional proposals to NIFF for wider industry discussion.

To say we are disappointed with the total disregard of the inshore fishing industry by these applicants, is an understatement. As the largest stakeholders in our coastal waters we were not consulted at any point during these planning applications and surveys. We understand that as part of a planning conditions for a wind farm the applicant must have a fisheries liaison officer in place. Although we have met with SSE representatives in April 2019 in regard to the development of wind turbines at the Arklow Bank there has been no contact in regard to the above applications by either Energia or SSE Renewables. Fishermen are working within all the areas covered by these planning applications however they were not consulted.

We know that offshore renewable energy is the fastest growing sector of the blue economy in Europe (European MSP Platform), and this growth has been and will likely continue to be fuelled by both strong policy drivers, alongside continued development of the industry, but this must not be at the cost of our livelihoods, our way of life or our coastal communities.

Currently, developing offshore wind farms closer to shore remains more cost effective on account of the high cost of laying foundations. However, the immediate upshot of this is that these developments will target the inshore zones where we fish. Thus, it follows that inshore fishers are currently the stakeholders most likely to be impacted by this.

Safety issues and displacement have both been highlighted as issues for coastal and small- scale fisheries, who do not always have the capacity to move to other fishing grounds, or switch to a different type of fishery. What will be the Irish position if these windfarms are approved, will small scale coastal fishers be excluded from fishing within the windfarm area? Will fishers be excluded from the fishing grounds that they have traditionally fished?

We have found that good communication and consultation have proved to be effective, both for fishermen and applicants. We in the south east had very good results with the Greenlink Interconnector project over the last two years, whereby industry was consulted at a very early stage, were able to highlight their concerns and issues and the applicant was able to answer and clarify those concerns within a very short space of time. Works continued without substantial impact on the fishing industry.

In the interest of good communications and consultation, we would like to request that all foreshore applications made to the DHPLG in particular those involving wind farms and interconnectors are notified to the NIFF through our secretary Denise Maloney ([denise.maloney@bim.ie](mailto:denise.maloney@bim.ie)). This would enable us to become involved in the planning process at an early stage and consult with the applicant. We would also like to request that the DHPLG encourages applicants through their fisheries liaison officer to engage in a constructive manner with the inshore fishing sector through the National and Regional Inshore Fisheries Forums at the earliest stage possible.

We hope you will take account of the concerns we raise above and facilitate our request.

Yours sincerely,



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Trudy Mc Intyre  
NIFF Chair

Cc: Minister Michael Creed T.D. Department of Agriculture, Food and the Marine

Cc: Minister Shane Ross T.D. Department of Transport, Tourism and Sport

Cc: Brian Hogan, Chief Surveyor, Marine Survey Office, Department of Transport, Tourism and Sport

Cc: Foreshore Section, Department of Housing, Planning and Local Government