

**Our Energy Future  
26 October 2022 Workshop  
Meeting Note**

*How Ireland Can Better Protect the Environment and Biodiversity While Delivering Necessary Infrastructure to Meet Climate and Renewables Targets Our Energy Future*

On the 26<sup>th</sup> of October 2022, Friends of the Earth facilitated an in-person workshop, organised as part of the *Our Energy Future* project, a partnership with the Renewables Grid Initiative and EirGrid. The purpose of the meeting was to provide participants with the opportunity to highlight concerns regarding environmental and biodiversity protection in the context of renewables expansion, as well as to map these issues and explore what changes are necessary at Government level.

The morning featured a private, facilitated discussion among civil society participants\* on issues relating to environmental impacts of renewables, changes to the planning system and the impact of offshore wind on Marine Protected Areas (MPAs). In the afternoon, civil society participants had the opportunity to engage with state and industry stakeholders\* on these issues. Resources from the workshop are available on the Friends of the Earth [website](#).

This note provides a summary of issues raised in discussions among civil society participants and in subsequent discussions with state and industry stakeholders. This note does not seek to detail all points made and rather attempts to provide a brief synopsis of significant matters and recommendations addressed in the workshop.

This note has been divided between sections on renewables development, the planning system, offshore developments and marine impacts, and new/other issues. Please note that information is not presented in any order of priority and that there is some overlap between sections.

## **1. Biodiversity and Renewables**

### High-Level Summary of Civil Society Concerns and Recommendations

- Biodiversity feels like the poor relation of climate action.
- Renewables are one more pressure on birds and biodiversity (on top of e.g. floods, drainage, forestry). 63% of birds are already amber listed.
- With all the case-by-case work, it's easy to lose sight of cumulative impacts.
- The scale of climate crisis is so overwhelming that the urgency to get on with action is leaving nature concerns in the dust but "panic does not make for good planning".
- It is extremely challenging for NGOs/activists/experts to engage and input into assessments given their lack of capacity.
- Planning applications are often extremely lengthy. In a developer-led (project-led) system, it feels like other stakeholders are playing catch up and lack resources relatively speaking - not only NGOs, but also the NPWS and An Bord Pleanála.
- The project-based consultations by companies often feel like a tick box exercise or even "a sham". Consultation often feels like "being informed" rather than "being asked". There are also weaknesses with Government consultations in terms of proper notification, notification periods and clear consideration of responses.
- There is no requirement for projects or regulators to pay attention to bird sensitivity mapping, for example.
- The Government needs to raise the status of biodiversity; one suggestion is for a Department of Nature and Biodiversity to be created.

- We need to limit energy demand growth in the first place (e.g. from data centres) and not only focus on supply.
- We need to move from a developer-led, site-specific, reactive approach to planning to a state-led, strategic, proactive approach to planning.
- The NPWS needs to have the resources and the mandate to prioritise better research, rather than relying on limited and piecemeal NGO-commissioned research
- We also need GPS tracking of birds in the Irish Sea.

Certain state/industry stakeholder(s):

- Pointed to legacy challenges and difficulties associated with responsibilities divided between Government Departments and bodies, as well as communication between these parties.
- Highlighted increased funding for the NPWS and recent commitments made in the NPWS Strategic Action Plan in terms of increased capacity and opportunities to improve biodiversity protection.
- Highlighted the particular opportunities for supporting biodiversity at/alongside solar developments.
- Supported more regular meetings between industry and environmental representatives and suggested that this type of workshop should be repeated.
- Highlighted the lack of funding for civil society and supported the need for new mechanisms for civil society to engage.

## 2. The Planning System

### High-Level Summary of Civil Society Concerns and Recommendations

- Concerns raised with lack of transparency and conflict of interest risks in relation to planning applications and associated environmental impact assessments by developers.
- It is not an appropriate Government response to make planning objections and judicial reviews more difficult. The main reason that JRs are taken and often won is because of flaws or errors in the approach to planning in the first place. Public bodies/Departments have in many instances failed to carry out adequate Sustainable Environmental Assessment/EIAs. Pressure is put on the planning system as it becomes a measure of last resort/watchdog due to earlier failings.
- Need for post-construction environmental monitoring and reporting at relevant sites.
- Difficulty in finding and accessing previous site specific research and assessments.
- There is a need for a centralised database/repository of environmental assessments/research that accessible to all who need it.
- Data used in assessments is not always up to date and in certain instances relate to different contexts outside of Ireland, which is problematic.
- The Government's National Biodiversity Plan should set requirements to ensure environmental issues are addressed before the planning stage.
- An independent body to perform Environmental Assessment Impacts should be created.
- The impacts of changes to the planning acts, as well as rising financial costs of appealing planning decisions, is problematic and risks locking groups/citizens out of the process.
- Lack of funding available to groups to address planning applications constitutes a major challenge.
- Guidelines should be developed in conjunction with civil society on what constitutes good community engagement.

- New technologies/operations to better protect wildlife at turbines/sites should be prioritised.

Certain state/industry stakeholder(s):

- Agreed with the need for improved strategic planning and data collection. It was indicated that data is often being collected by developers but there are challenges regarding publication and circulation of this data.
- Supported the need for more of a state-led approach and the need for better community engagement in the planning process.
- Agreed that monitoring at sites must be improved and monitoring reports should be published.

### 3. Offshore Wind and/or Marine Protected Areas

#### High-Level Summary of Civil Society Concerns and Recommendations

- The climate crisis should not be tackled ahead of, or at the expense of, the biodiversity crisis
- There is a need for an independent Marine Planning and Offshore Regulator that has environmental and ecological impacts as part of their remit.
- Selection of offshore wind sites would benefit from greater Government oversight.
- Site selection for offshore wind development is crucial to prevent environmental/ biodiversity impacts and a comprehensive site selection process must inform development plans.
- Marine Protected Areas need to expand significantly from 3% to 30% of Irish waters. There is a concern that MPA legislation will not effectively protect nature/ biodiversity and that MPAs will be deprioritised to facilitate offshore wind development.
- Ireland's coast support globally important bird populations.
- Greater investment is needed in environmental protection, restoration, education and training.
- Developers should take pro-active and transparent steps to minimise impacts from development and to enhance conservation status of their sites.
- There is a need to better enforce existing environmental regulations and to accelerate progress on designating protected areas. The target is 30% by 2030 but it needs to be a priority for the Department of Housing and Planning and the NPWS.
- There is a lack of information on the trade-offs in terms of the scale of offshore wind development and the impacts this may have for biodiversity at specific sites. Questions arise as to what is an excessive or sufficient level of renewable development in light of both climate and biodiversity obligations.
- One recommendation included that construction should not move forward when proper planning and assessments have not taken place.

Certain state/industry stakeholder(s)

- Highlighted challenges associated with differing approaches, interpretations and responses of local authorities in terms of how they analyse and evaluate environmental impacts.
- Noted the need for improved biodiversity responses and MPA designation.
- There is equally a risk that any delays in terms of renewables development would ultimately result in higher emissions.
- Agreed that every new project seeking planning should include nature-inclusive design.

### 4. Other/Cross-Cutting issues

## High-Level Summary of Civil Society Concerns and Recommendations

- Fundamental weaknesses exist in Government capacity, including, but not only, in the Department of Housing, Planning and Local Government, the NPWS, ABP, as well as in local authorities. There is a need for significant investment in ecologists at the highest level of all relevant public bodies and Departments.
- Strategic Environmental Assessments have either been poor (e.g. the line repeated that there are “no adverse effects”) or have failed to be produced for certain developments.
- There needs to be systematic engagement with communities at each stage of the planning and construction process and for communities to be involved in monitoring environmental impacts.
- Greater investment is required in education, research and training in order to improve awareness and understanding of the biodiversity crisis/protection, both among the general public and decision-makers.
- Data centre developments are posing extreme challenges for the electricity system, resulting in increased gas demand, burning of fossil fuels and risk locking in emissions through construction of new gas plants. The planning system is not adequately responding to emissions and environmental risks associated with these developments. Risks were also raised regarding planning permissions for developments at Aughinish Alumina and a Limerick incinerator.
- There is often a lack of awareness of the extreme anxiety and fear caused by the climate and biodiversity crises for community, groups and individuals (young and old).
- Questions were raised around the environmental impacts of materials used at renewable sites, including sustainability concerns in terms of extraction/construction, removal and re-use/recycling.
- There is a need for climate and biodiversity to be considered side by side at the highest level of decision-making.
- There were calls for industry to prioritise and resource biodiversity protection on an ongoing and long-term basis (i.e. not only in initial assessments), including through hiring of ecologists.
- There also needs to be stronger support and funding from Government in relation to EU Nature Restoration Law.

Certain state/industry stakeholder(s):

- Supported the need for increased funding so these parties can engage early and often.
- Highlighted the current lack of capacity at Departmental level and in relevant Government bodies.
- Also noted challenges in terms of finding ecologists and marine specialists and supported the need for greater investment in training.

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\*Registered civil society participants included:

- BirdWatch Ireland
- Bat Conservation Ireland
- Clare PPN
- Coastal Concern Alliance
- Coastwatch
- Cooley residents group

- Dublin City PPN
- Glinsk Ladies Club /Barlows Organic Farm
- Good Energies Alliance Ireland
- Fair Seas Ireland
- Futureproof Clare
- Irish Environmental Network
- Irish Wildlife Trust
- Irish Whale and Dolphin Group
- Native Woodland Trust
- The Nature Company
- South East Coastal Protection Alliance
- Sustainable Water Network
- The Rediscovery Centre
- Trinity College Dublin
- Westside Resource Centre, Galway City.

Registered state/industry stakeholders included:

- ESB
- EirGrid
- Govt Advisors
- Irish Bioeconomy Foundation
- The Irish Planning Institute
- Simply Blue Group
- Wind Energy Ireland