



An
Coimisiún
Pleanála

Record of 1st Meeting ABP-321635-25

Case Reference / Description	Proposed Decommissioning of Arklow Bank Wind Park Phase 1 located on the Arklow sand bank, within 10 km off the Coast of Arklow, County Wicklow.		
Case Type	Pre-application consultation		
1st / 2nd / 3rd / 4th Meeting	1 st Meeting		
Date	16/06/2025	Start Time	11:00am
Location	Virtually	End Time	02:00pm

Representing An Coimisiún Pleanála

Stephen Kay, Assistant Director of Planning, Chair

Susan Clarke, Senior Planning Inspector

Conor Donnelly, Senior Marine Ecologist

Eugene Nixon, Marine Advisor

Sinead White, Executive Officer

Representing the Prospective Applicant

Anne-Marie Coyle, Gevernova

Jerry Barnes, McCabe Durney Barnes

Matthew Royal, Ramboll

Kim Bridge, Ramboll

Introduction

The Commission referred to the letter received from the prospective applicant on the 8th January 2025, requesting pre-application consultations under section 287 of the Planning and Development Act 2000, as amended, and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Commission. It also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Commission. The purpose of the meeting is also to give the Commission an opportunity to provide its opinion on issues relating to the making of an application and other matters including National Marine Planning Framework, objectives of maritime spatial planning, the principles of proper planning and sustainable development and the environment and any European site that the Commission is likely to take into consideration in making a decision on an application.

The Commission's representatives mentioned the following general procedures in relation to the pre-application consultation process:

- The Commission will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Commission once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- It is not permitted to record this meeting in any way. The only record of this meeting will be the record you will receive from the Board following this meeting.
- A further meeting or meetings may be held in respect of the proposed development.

- Should the prospective applicant submit an application for an opinion under section 287A of the Act (Design Options) a meeting will be held at a later date, and as part of this s.287 pre application consultation.
- Further information may be requested by the Commission and public consultations may also be directed by the Commission.
- The Commission may hold consultations in respect of the proposed development with other bodies.
- In accordance with Section 287(3) of the Act, the decision to close a consultation rests with the Commission. At the conclusion of the pre application process the case file including the record of the meetings held and the report of the reporting inspector detailing the issues arising in the consultation, will be forwarded to the Commission. The Commission will issue a Direction/Order clarifying that the consultation has closed and that the prospective applicant may make an application for permission under Section 291.
- The holding of consultations does not prejudice the Commission in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

Presentation made by the prospective applicant:

The presentation began by the prospective applicant introducing attendees and then introducing the project and its history before highlighting the benefits the windfarm had and what it has provided during its time in operation.

The prospective applicant then discussed the current status of the wind farm, stating that it is now past its 20-year design life and that removal is now necessary. They detailed how a lightning strike in October 2022 caused damage to turbine 5, resulting in five months of work to remove damaged blade material from the site and coast. It was also noted that there has been no generation from this wind farm since May 2024. The prospective applicant also stated that the lightning protection installed on the site was no longer considered fit for purpose.

The prospective applicant discussed the decommissioning process and why it is now necessary, as it is not possible to extend or replace the equipment. It was also stated that there is a 10-month lead time required before decommissioning can begin to facilitate procurement of the required equipment. The prospective applicant stated that if decommissioning was to start in the summer of 2026, they would therefore need to obtain permission to do so by August 2025.

The prospective applicant set out the process by which it had obtained a foreshore lease for the installation and operation of the windfarm and how a condition attaching to this lease required the submission of a decommissioning and restoration plan for agreement at the end of the project's life and prior to decommissioning. The prospective applicant detailed how they had approached MARA regarding the submission of a decommissioning and restoration plan but that it was MARA's view that arising from the provisions of the Maritime Area Planning Act, as amended by the provisions of the Planning and Development Maritime and Valuation

(Amendment) Act, 2022, that planning permission was required for the decommissioning works proposed.

The prospective applicant advised that a number of decommissioning methodology options are currently being considered as part of the Comparative Assessment, and that meetings are being held with contractors to decide what option is most feasible and safe.

The presentation was concluded by the prospective applicant presenting their next steps, which are to finalise the methodology option and subsequently complete the Comparative Assessment, Environmental Impact Assessment and Appropriate Assessment screening report.

Discussion:

- In response to a question from the prospective applicant, the Commission's representatives stated that it has not been decided whether any external parties will be consulted on the case. The Commission representatives stated that, in line with the general procedures outlined at the start of the meeting, it was open to the Commission to hold consultations in respect of the proposed development with other bodies.
- The Commission's representatives queried the relationship between the Foreshore Lease from 2002 and the Sublease from 2003 pertaining to the existing windfarm and the status of these leases. Following a discussion regarding the eligibility for prospective applicants to enter into pre-application discussions, the Commission queried whether the Foreshore Lease/Sublease has been surrendered or is required to be surrendered as part of a condition attached to the Maritime Area of Consent (MAC) relating to Arklow Bank Phase 2 (Ref. 319864), which is currently being assessed by the Commission.

- The prospective applicant stated that they are confident they have adequate rights to enter into pre-application consultation regarding the proposed development as they believe the Sublease still stands, but they will prepare a written submission to confirm this subsequent to the meeting.
- The Commission's representatives also questioned whether the scope of the proposed development includes the removal of the grid connection and noted as that this part of the proposed development is located outside of the Sublease area. The prospective applicant informed the Commission's representatives that they will investigate this further and follow up with the required information after the meeting.
- In response to a question from the Commission's representatives, the prospective applicant stated that the currently favoured method of removal of the turbines involves the removal of the tower in two sections. The transition piece would then be removed and the foundation cut at approximately 2 metres below seabed. The existing foundations have a diameter of c.5 metres and a depth of c.35-40 metres. It was also stated that the meteorological mast to the south of the seven turbines would also be removed. The prospective applicant stated that vibration methods could also be used for removal of monopiles, however this technology is not well developed and unlikely to be used.
- In response to a question from representatives of the Commission, the prospective applicant stated that it was not envisaged that a design flexibility opinion would be sought in respect of the proposed development.
- The Commission's representatives questioned whether the proposed development had scour protection, to which the prospective applicant stated that the scour protection is only on the turbine foundations, not the cables and

that it is biodegradable. With regard to the cables, the prospective applicant stated that the merits of removal of same is site specific, however it is considered that cable removal is feasible.

- The Commission's representatives raised a query on how far along the prospective applicant is in regard to the preparation of the Comparative Assessment Report, to which the prospective applicant stated that there are discussions ongoing with contractors to confirm what is feasible. As such, there is no concrete timeline as to when it will be completed. However, it is hoped that they will finalise a methodology option within a couple of weeks and complete the Comparative Assessment Report in 4 to 6 weeks.
- The Commission's representatives advised the prospective applicant to ensure that as much clarity as possible on the scope of the project is provided to ensure the most useful feedback can be given during the pre-application stage.
- Following a query from the Commission's representative, the prospective applicant stated that they hope that the whole project would take around 3 to 4 months to complete. The prospective applicant also stated they would want the flexibility to have overnight works available during the project due to weather and tidal constraints. In this regard it was stated that a wave height limit for the movement of jack up vessels of 1.0 - 1.3 metres was likely to apply and that there were also potential restrictions in terms of low water depths at certain locations and times of the tide.
- In response to a question relating to onshore / terrestrial works proposed, the prospective applicants stated that the extent of any such works would be limited. It was stated that the extent of such works would be clarified as would the scope for such works to be undertaken at the same time as offshore works.

- The Commission's representatives questioned how the materials taken from the decommissioning will be recycled or disposed of. The prospective applicant stated that everything that will be removed will be recycled or reused and there are already proposals from companies for this activity and that landfill or incineration options will be avoided.
- Following a query raised by the Commission's representatives, the prospective applicant stated that they hope that there will be no dredging works required in for the project, but this will be confirmed once a methodology has been chosen.
- The prospective applicant informed the Commission that the type and number of vessels needed for the project will be estimated and that use of any ports is yet to be decided.
- Following a query from the Commission's representatives, the prospective applicant stated that they are speaking to SSE (developer for the proposed Arklow Phase 2 windfarm) in relation to environmental surveys and it is believed they have sufficient baseline information at this time. The Commission highlighted that a Request for Further Information has been issued in respect of the proposed Phase 2 development and recommended the prospective applicant review same should any of the items be relevant to the subject development.
- The prospective applicant informed the Commission's representatives that they are aware of a potential for bat roosts on the turbines, and they are keeping this in mind and discussing it with SSE.
- In response to a question from the Commission's representatives regarding the scope of any site investigation works required, the prospective applicant stated

that the only surveys envisaged are bathymetry and that other than this there is sufficient information available.

- After a question from the Commission's representatives, the prospective applicant confirmed that a cumulative assessment will be carried out.
- The prospective applicant informed the Commission's representatives that the necessity for an Environmental Impact Assessment Report will not be confirmed until a methodology has been decided on. It was submitted that it was considered likely that the decommissioning activity could be screened out for EIA and the prospective applicant stated that they would examine whether the proposed works were a class for the purposes of EIA.
- Representatives of the Commission noted that s.288(1) of the Act requires that where the proposed development is considered to be of a class for the purposes of Part 2 of the Fifth Schedule of the 2001 Regulations, that the information specified in Schedule 7A should be submitted.
- In response to a question regarding public consultation on the proposed development, the prospective applicant stated that they had send a short advisory note to c.35 bodies in early 2025. The Commission's representatives advised that consultation with relevant prescribed bodies and coastal planning authorities would be undertaken at this time.
- The Commission's representatives advised that an ecosystem-based approach should be adopted in the preparation of the application, including an assessment of impacts on relevant ecosystem functions and services and associated mitigation measures.

- Furthermore, the Commission's representatives advised on the importance of demonstrating compliance with the NMPF and other relevant Guidelines in the preparation a future application.
- The prospective applicant noted that a dumping-at-sea permit may be required but this is still to be confirmed. It was noted that there is an existing dumping at sea permit relating to the site but that this will lapse shortly. The prospective applicant confirmed that no activity on foot of this permit had been undertaken to date.
- The Commissions representatives advised the prospective applicant to examine the proposed development in the context of OSPAR requirements and that compliance with the OSPAR requirements relating to the status of infrastructure and requirements for removal should be addressed in any application submitted.
- The Commission's representatives advised the prospective applicant that should an application be lodged to the Commission that the criteria specified in Section 291 of the Act would be required to be complied with including the preparation of a website.
- The Commission's representatives concluded the meeting by advising the prospective applicant to have as much detail as possible included in any prospective application.

Conclusion:

The Commission representatives re stated that the meeting was an information gathering exercise for the Commission and that the response of the prospective applicant on the issues discussed, and particularly the issue relating to the foreshore lease and sub lease discussed, would be welcomed before a further meeting was

scheduled. Representatives of the Commission stated that discussion of more detailed technical matters relating to the proposed development could be facilitated at subsequent meetings if held and issues to be addressed in any such meetings would be communicated to the prospective applicant in advance.

The record of the instant meeting will issue in due course and the prospective applicant can submit any comments it may have in writing or alternatively bring any comments for discussion at the time of any further meeting.

The Meeting concluded at 2:00pm.



Stephen Kay

Assistant Director of Planning