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MACCABE DURNEY BARNES

PLANNING | ENVIRONMENT | ECONOMICS

Our Ref: 2306-Arklow Bank Wind Park Phase I Decommissioning

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

9/1/2026

Re: Application to An Coimisiún Pleanála under section 291 of the Planning and Development Act, 2000, as amended, for the decommissioning of Arklow Bank Wind Park Phase I

Dear Secretary,

We, MacCabe Durney Barnes, wish to submit this planning application on behalf of our client, Arklow Energy Limited (AEL), 25 North Wall Quay, Dublin 1, D01 H104, to An Coimisiún Pleanála ("the Commission") for permission under Section 291 of the Planning and Development Act 2000, as amended (the "Act"), for the decommissioning of Arklow Bank Wind Park (ABWP) Phase I.

A description of the proposed development is set out below:

The decommissioning of the Arklow Bank Wind Park (ABWP) Phase I, an offshore wind farm (OWF), consisting of a generating station with wind turbine generators (WTGs) located in the maritime area, in the Irish Sea, approximately 10 km off the County Wicklow Coast. The onshore substation is located on North Quay in the Arklow Harbour, Arklow, Co. Wicklow. The Proposed Works Offshore will consist of the decommissioning of the generating station, the met mast and the Proposed Works Onshore will consist of the decommissioning of the onshore transmission infrastructure.

The Proposed Works Offshore will consist of:

- The dismantling and removal of the 7 no. WTGs components including full de-energising of the WTGs, permanent removal of the rotors and blades, removal of the nacelles and of the towers.
- The dismantling and removal of the Met Mast , specifically of the top section that includes the meteorological sensors and of the triangular platform.
- The cutting out of the transition pieces, connecting the WTGs and met mast to their foundations.
- The cutting of the monopiles in water depths ranging from -6.59m mLAT (WTG 2) to -10.55 mLAT (met mast) and associated dredging to facilitate removal.
- The removal of residual scour protection.

- The unburial, cutting and removal of all inter-array cables which are approximately 7.4 km in length with a diameter of 100 mm.
- The unburial, cutting and removal of the offshore export cable which is approximately 15.6 km in length to the landfall point with a diameter of 127mm.

The Proposed Works Onshore will consist of:

- The dismantling and removal of the substation building and all internal equipment.
- The removal of cooling oil from transformer and transport to a licensed waste facility.
- The removal of grey water from submerged oil interceptor tanks.
- The excavation and removal of concrete bund.
- The permanent removal of onshore cable between the landfall point and the onshore substation.
- The clearance, levelling and reinstatement of the site.

Planning permission is sought up to the 19th June 2033 to align with the duration of the Foreshore Sub Lease.

The proposed development is not likely to have significant effects on the environment of the United Kingdom and Isle of Man, state party to the UNECE Convention on Environmental Impact Assessment in a Transboundary Context. The Environmental Impact Assessment Report (EIAR) has not identified any significant transboundary effects.

The application relates to a development which comprises an activity requiring a Dumping at Sea permit.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development.

AEL is the holder of a lease issued under Section 2 of the Foreshore Act 1933. In accordance with section 281(2) of the Planning and Development Act 2000, as amended, AEL is entitled to make an application. There is a covenant under the lease, requiring the applicant to carry out the decommissioning works.

The decommissioning works are described in details in the documentation submitted as part of this planning application. A schedule of the documentation provided as part of this planning application can be viewed under **Appendix 1** of the **Planning Application Form Appendices**. Two hard copies and two digital copies of the full application are enclosed for your information. The application may also be inspected online at the project website set up by the applicant: <http://www.arklowbank1decomm-planning.ie/>

We have also included a shapefile of the planning application boundary in the digital copies only.

The applicable fee of €100,000 has been paid by cheque and accompanies this application.

In accordance with section 293(3)(a) of the Act, a notice has been published in the Irish Daily Star and the Wicklow People (both dated 9th September 2026) before submitting this application. A site notice has been erected at the onshore substation on North Quay in the Arklow Harbour, Arklow, Co. Wicklow on the 9th September. A copy of these notices is provided in (Appendix 3 of the **Planning**

Application Form Appendices). The notices advise that any submissions/observations must be received by the Board not later than 5.30 pm on the **20th November 2026** (inclusive).

The relevant Coastal Planning Authority is Wicklow County Council. The Coastal Planning Authority was provided with two no. hard copies and two no. digital copies of the planning application. As directed by the Commission in the Direction CD-022195-26 attached to ABP-321635-25, the applicant has also provided copies to the bodies listed in Appendix 5 of the **Planning Application Form Appendices**.

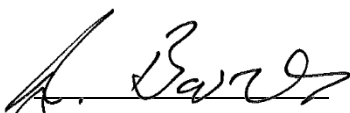
AEL engaged with the Commission as required under Section 287 of the Planning and Development Act, 2000, as amended. The pre-planning consultation was formally concluded on the 19th May 2026.

AEL's overarching priority is to ensure that ABWP Phase I does not cause harm to people, vessels or marine life. The continuing degradation of the infrastructure poses an increasing risk to the safety of the maritime area which the Irish State is required to safeguard. The Maritime Safety Act 2005 provides the legal framework within which the State must ensure the safety of the maritime area. Under article 6 of the Maritime Spatial Planning Directive (2014/89/EU), safety at sea is one of the minimum requirements for maritime spatial planning (MSP). This, in turn, is reflected in the National Marine Planning Framework (NMPF) under the Safety at Sea policies. If ABWP Phase I is left in situ as is, and the infrastructure continues to deteriorate, there is an increasing risk of collision from falling debris, including the potential for debris to wash up on the coast. Given the lengthy time expended so far, AEL has commissioned an engineering review of the probability and timeline of failure of the ageing infrastructure. The preliminary results indicate that the degradation will increase exponentially beyond 2027. The decommissioning works are therefore necessary to safeguard the maritime area.

AEL is concerned that the continuing degradation of the infrastructure may lead to pollution in the maritime area. Timely decommissioning will mitigate this risk and support AEL's compliance with its obligations under that framework.

If AEL is able to secure consent during the first half of 2027, then it may be able to execute works offshore during 2028. Whilst AEL understands that due process must be followed, we would respectfully urge the Commission to process this application as expeditiously as possible.

Yours sincerely



Jerry Barnes
Director
MACCABE DURNEY BARNES