



Arklow Bank Wind Park Phase I Decommissioning

Stakeholder Consultation and Engagement Report

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ABBREVIATIONS

Abbreviation	Term in Full
ABWP	Arklow Bank Wind Park
ACP	An Coimisiún Pleanála
AEL	Arklow Energy Limited
AIS	Automatic Identification System
CEMP	Construction Environmental Management Plan
CIL	Commissioners of Irish Lights
DaS	Dumping at Sea
DEMP	Decommissioning Environmental Management Plan
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
FLO	Fisheries Liaison Officer
HWM	High Water Mark
LMP	Lighting and Marking Plan
MAC	Maritime Area Consent
MARA	Maritime Area Regulatory Authority
MSO	Marine Survey Office
MUL	Maritime Usage Licence
OEC	Offshore Export Cable
PDA	Planning and Development Act
WMP	Waste Management Plan
WTG	Wind Turbine Generator

1. INTRODUCTION

This Stakeholder Consultation and Engagement Report provides a summary and record of the stakeholder engagement carried out by Arklow Energy Limited (AEL) ('the Applicant') in respect of the planning application for the decommissioning of the Arklow Bank Phase I (ABWP Phase I).

This report forms part of the planning application to An Coimisiún Pleanála (ACP). The ABWP Phase I decommissioning Project Team recognises the importance of informing and engaging relevant stakeholders during the decision-making process and development of the Environmental Impact Assessment Report (EIAR). Active and open engagement with key stakeholders has therefore been considered and applied since the inception of this project and will continue throughout the planning application process.

To date, the ABWP Phase I decommissioning project has undertaken four phases of stakeholder engagement, including one phase of non-statutory consultation on the EIAR Scoping report, issued in March 2026 (See Section 0).

The feedback gathered during this process is presented in this report. All feedback received has been reviewed by the project team to ensure its consideration and application in the proposed decommissioning process.

1.1 Background to the Proposed Works

AEL is the applicant and is a subsidiary of GE Vernova. GE Vernova Inc. (NYSE: GEV) is a global energy company.

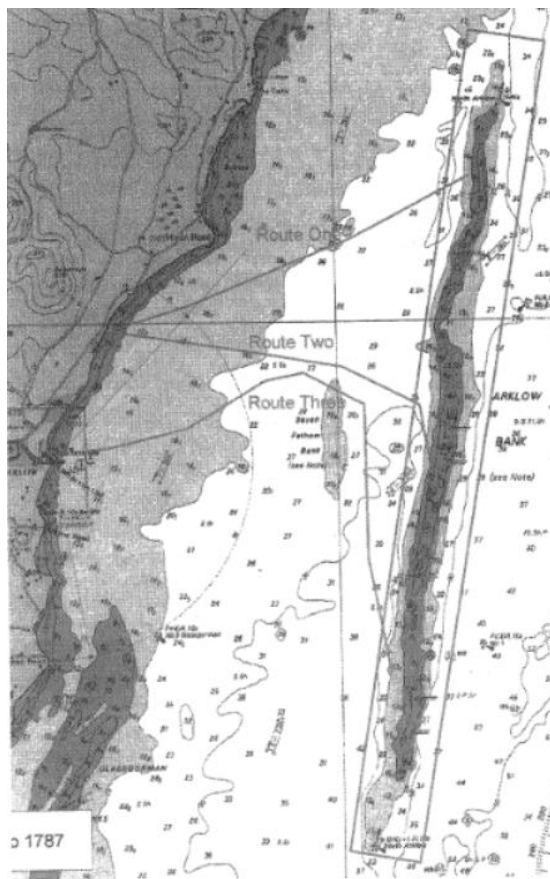


Figure 1: FS0005429 Lease Area

Sure Partners Ltd. was awarded a Foreshore Lease (FS005429) under the Foreshore Act 1933 (as amended) for the purpose of construction and operation of a Wind Farm in January 2002. The area is shown in the map above.

The site to which this application pertains was then subleased to AEL, for a period of 30 years, in accordance with the terms and conditions set out in the Tri-Partite Agreement dated 20th June 2003. This sublease, which is due to expire in 2033, was for the development of ABWP Phase I, comprising seven turbines (type GE Wind 3.6sl) with a combined export capacity of approximately 25.2MW to be installed on the Sub Lease Area, within the wider Foreshore Leasehold Area. In essence, the sub-lease comprises a portion of the Foreshore Lease (FS0005429).

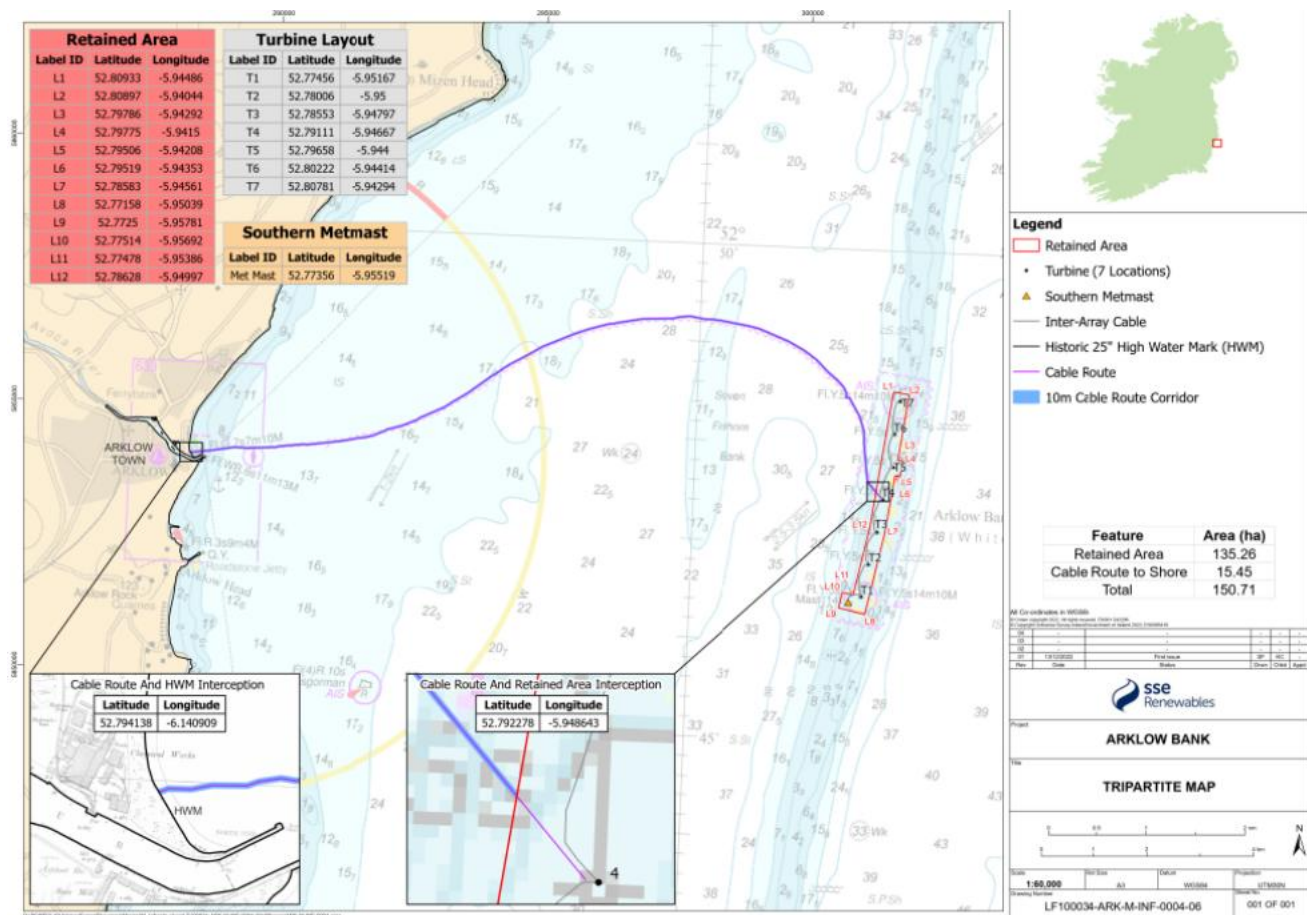


Figure 2: Map showing the sub-lease area

The Foreshore Sub-lease, shown in the figure above, will expire in 2033. The area included in this lease comprises the offshore area subject of this planning application.

1.2 Purpose of the Report

The purpose of the Stakeholder Consultation and Engagement Report is to detail the information and consultation process, and to record the feedback provided during consultations relating to the proposed decommissioning approach.

In order to assist in the engagement process, a non-statutory EIA Scoping Presentation (see Volume 3, Appendix 1.1 of the EIAR) was prepared and circulated to relevant stakeholders in March 2026.

The subject report also summarises the engagement which has taken place with fisheries. In doing so, application of international best practice for project development is demonstrated. A summary of the timelines, scope, and actions resulting from further project engagement with prescribed bodies, regulatory stakeholders, competent authorities and selected State agencies is also provided within the body of this report. It is noted that while this report captures the consultation and engagement approach and actions of the ABWP Phase I project to-date (June 2026), dialogue and consultation with a diverse range of stakeholders will continue throughout the application and decommissioning process.

A full schedule of consultations accompanies the application documentation. The response to the statutory section 287 consultation with ACP is addressed in the Planning Report accompanying the planning application.

2. POLICY AND LEGISLATION RELATING TO CONSULTATION

2.1 Aarhus Convention

The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters ('Aarhus Convention'), sets out the basic rules for the promotion of public participation in environmental decision-making, and was signed in Aarhus, Denmark in 1998. The Convention was formally ratified by the European Union in 2005, and by Ireland in 2012.

The Aarhus Convention is structured by three pillars;

Access to Information

Implemented by *EU Directive 2003/4/EC* on Public Access to Environmental Information and, in Ireland, the European Communities (Access to Information on the Environment) Regulations 2007-2011, this pillar provides to the public the right to request environmental information that is held by public bodies. It also obliges public bodies to maintain this information.

Public participation in environmental decision-making

Implemented by *EU Directive 2003/35/EC*, ('the *Public Participation Directive*'), this pillar provides the right of the public to take part in making decisions where there may be an environmental impact. This includes, *inter alia*, planning decisions and environmental licenses. Article 6 of the Aarhus Convention lays out this pillar, advising that public authorities must publish public notices and project information, to enable the public to comment and make submissions on proposals. The Convention advises that the outcome of this process should be taken into 'due account' in the subsequent decision-making process.

Article 6(5) also advises that *"Each Party should, where appropriate, encourage prospective applicants to identify the public concerned, to enter into discussions, and to provide information regarding the objectives of their application before applying for a permit."* The advisory nature of this provision is confirmed in the Aarhus Implementation Guide, most recently updated by UNECE in 2014, where information exchange is 'encouraged' 'where appropriate'.

Access to justice

Article 9 of the Aarhus Convention establishes the right of the public and non-governmental organisations to adequate review procedures for challenging decisions relating to the environment. This review is of the substantive and procedural legality of a decision taken by the relevant public authority, rather than a review of the merits of the decision.

In line with the substantive provisions of the Aarhus Convention which ensure that the public concerned shall be provided 'early and effective opportunities to participate' in environmental decision-making with regard to consent for projects, the public concerned shall be entitled to submit comments and opinions to the competent authority before the decision on development permission is made.

2.2 Environmental Protection Agency Guidance

The EPA guidelines on the information to be contained in Environmental Impact Assessment Reports, published May 2022, is structured by a number of fundamental principles – one of which being the facilitation of better consultation. Under this fundamental principle, good practice in preparing EIARs is described as involving clear and focused consultation with various parties at key stages in the assessment process. The Guidance additionally requires that compliance with the Aarhus Convention is achieved, in that the structure, presentation and the non-technical summary of the EIAR, as well as the arrangements for public access, shall facilitate the dissemination of the information contained in the EIAR.

The objective of public consultation measures is described as ensuring that the public are made “...as fully aware as possible of the likely environmental impacts of projects prior to a decision being made by the Competent Authority”.

Both the compliance requirement and core objective above are addressed and achieved within the context of the ABWP Phase I decommissioning project through the publication of the EIAR in full on the project website, see <http://www.arklowbank1decomm-planning.ie/>, and the making available of copies of the planning application in full at the Wicklow County Council.

In line with further recommendations of the EPA guidelines, consultation has been allotted sufficient time by the Applicant, and has been structured to ensure clarity and consistency, exemplified in the circulation of the accessibly written, objective and factual non-statutory EIA Scoping Presentation in early March 2026.

The circulation of this EIA scoping presentation before the statutory consent determination process allowed for the pre-emptive identification and addressing of issues in advance of formal application, pursuant to best-practice methods in consultation.

2.3 The European Commission EIA Directive

The execution of an EIA is a requirement of EU Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment, commonly known as the ‘EIA Directive’. The EIA Directive is transposed into Irish Law by the Planning and Development Act 2000 (the ‘2000 Act’), which provides the statutory framework for planning and environmental assessment in Ireland.

The purpose of an EIA is to ensure that projects that are likely to have a significant impact on the environment are identified and assessed, within an appraisal process, before said projects proceed to development. Article 4 of the EIA Directive makes provisions for EIAs required in respect of certain projects listed in Annex I (mandatory EIA) and II (projects that require a determination as to whether an EIA is required, through case-by-case examination and/or by the application of thresholds or criteria set by the relevant Member State).

The substantive provisions of the EIA Directive direct that the public concerned, a term defined in Article 1(2)(l), shall be given ‘early and effective opportunities to participate’ in project environmental decision-making and consenting procedures. Pursuant to this provision, the public concerned is entitled to submit opinions and comments before ACP’s decision on development permission.

3. STAKEHOLDER ENGAGEMENT APPROACH

3.1 Objectives for project engagement

Stakeholder consultation and engagement is considered a critical element for the decommissioning of the ABWP Phase I project. The project-level approach to this consultation and engagement reflects the requirements of the relevant policy and legislation laid out in **Section** Error! Reference source not found., as well as Industry best practice.

The objectives of the consultation and engagement carried out in respect of the ABWP Phase I decommissioning project application with the aim of reflecting policy and legislation requirements and best practice approaches are to:

1. Increase awareness and understanding of the ABWP Phase I decommissioning project information, including scope, necessity, timeline, potential impacts, and benefits;
2. Proactively involve relevant stakeholders in the EIAR decision-making process;
3. Address through transparent response and/or project design relevant concerns or input raised by stakeholders in the consultation process; and
4. Establish confidence and trust in the ABWP Phase I decommissioning project and project team through the provision of open, transparent communications; through the clear and authentic representation of the project at each stage of decommissioning; and through the provision of information based on the level of detail available at each stage and in good faith, including aspects of the project for which uncertainty exists at a particular time.

By establishing and achieving these objectives, the ABWP Phase I decommissioning project has ensured that the project design process is transparent, accountable and based on the expert input of a broad range of statutory and non-statutory relevant stakeholders.

3.2 Stakeholder engagement resources

3.2.1 Project Consultation and Engagement Team

During the second half of 2024, the Applicant, AEL, established roles within the existing planning and EIAR team to ensure proactive, informed stakeholder engagement and management. Further external expert consultants were engaged during 2024 and 2025 for the management of interactions with fisheries and aquacultural interests.

MacCabe Durney Barnes provided project communications advisory and services for Prescribed Body engagement.

GDG has provided technical and engagement support services to the project.

Ramboll formulated the EIA Scoping Presentation with the objective of summarizing and making accessible a technical description of the proposed contents and scope of the EIAR which supports this application. This EIA Scoping Presentation was circulated to Prescribed Bodies as part of the non-statutory consultation process, with the dual aims of prompting feedback, understanding concerns and information from relevant bodies to shape project decision-making, and ensuring that the objectives of the ABWP Phase I Project were fully understood. All feedback gathered through this engagement process was processed and recorded by the MDB team, and

shared to the core planning and EIAR team to inform the EIAR process, and the final decommissioning works programme.

The ABWP Phase I project has had a dedicated Fisheries Liaison Officer (FLO), Brendan Dillon, since February 2026. The objective for the Fisheries Engagement Manager has been to work with fishers to ensure the co-existence of the decommissioning activities with their activities. The FLO, on behalf of AEL, has listened to and recorded fisheries' concerns, providing feedback to the planning and Project Design Team.

NiMa Consultants Ltd. was additionally engaged to provide consultancy with regards to engagement of commercial fisheries. NiMa is responsible for the preparation of the Fisheries Management and Mitigation Strategy (FMMS) as a stakeholder engagement resource and as one component of the overall EIAR submission (see Volume 3, Appendix 3.6). The FMMS sets out how AEL proposes to communicate and engage with the fishing industry, manage interactions with fishing activity, and minimize disruption during offshore decommissioning works.

The team has also engaged with Irish and UK Governments, Irish, UK and European industry associations, Phase 1 developers and the supply chain to understand cumulative effects, developing practices and to map the level of maturity, experience and tools available to safely decommission.

3.2.2 Website

A comprehensive and accessible website <http://www.arklowbank1decomm-planning.ie/> for the application has been available since the date of submission of the application. The website provides stakeholders and the public with access to the full suite of documentation, drawings and technical reports and statutory notices.

3.2.3 Public Notices

In accordance with the requirements of the section 291(3) of the Planning and Development Act, notices have been published in The Wicklow People and The Irish Daily Star. In addition, while not required by statute, a site notice has been erected at the onshore site. A copy of the application is made available at the offices of Wicklow County Council, the coastal planning authority.

Stakeholder Engagement Roadmap

Prior to the submission of the planning permission application, the Applicant and Project Team, as outlined above, executed a stakeholder engagement and consultation campaign. This was delivered in four phases, described below. It is noted that the initiation of a subsequent phase does not imply the conclusion of the former, as engagement was open and continuous with stakeholder groups throughout the pre-application process, to ensure maintenance of dialogue.

Phase A: Early Engagement: This phase comprises the initiation of engagement with the Maritime Area Regulatory Authority (MARA), the regulator of Ireland's maritime area, and ACP for the purposes of initial briefing on the decommissioning proposal, and for establishing the legal and consenting framework under which the ABWP Phase I application was to be progressed. This early engagement was foundational to the overall development of ABWP Phase I application.

Phase B: Widening Engagement: This phase comprised the widening of engagement to encompass national-level state and semi-state bodies and agencies. This included a number of statutory stakeholders, or prescribed bodies. Non-statutory stakeholders with a relevant role in marine activities and the marine environment were engaged. The EIA Scoping Presentation used to brief and invite feedback from the bodies involved in Phase B of engagement is discussed in **Section 4.5**, and provided in **EIAR Volume 3 Appendix 1.1: EIA Scoping Presentation**.

Phase C: Regional-level Engagement: In this phase, the Applicant engaged with regional stakeholders on the decommissioning proposal. This included the provision of information to relevant local authority and the relevant harbour authority, in this case, Wicklow County Council (WCC), and specific fisheries engagement. Feedback was sought through the Section 247 procedure from WCC. This phase also saw the appointment of the FFLO, the circulation of briefing letters, and the establishment of a fisheries and aquaculture dialogue channel.

Phase D: Consenting Process: The consenting process phase represents the entire process of statutory engagement underway since 2024 which aims to achieve statutory consents and compliance of the ABWP Phase I project in line with the relevant legislation and policy at EU and national level. This phase will be active until the achievement of all consents pertaining to this application, after which the decommissioning works phase will be initiated.

4. CONSULTATION WITH PRESCRIBED BODIES AND REGULATORY STAKEHOLDERS

4.1 Overview of pre-application consultation

Between 2024 and 2026, ABWP Phase I project team has engaged and consulted extensively with relevant stakeholders. Throughout this period, the project team has organized multiple meetings and briefings, disseminated information and scoping reports for stakeholder input, and engaged with fisheries and aquaculture interests; providing meaningful opportunities for stakeholders to contribute to and shape project development and decision-making. The aim of this ongoing consultation has been the integration of relevant stakeholder input into design considerations and the ABWP Phase I planning application.

The prescribed bodies for the purpose of an application made under Section 291 of the Planning and Development Act 2000 (as amended) are prescribed in Article 8 of the Planning and Development (Maritime Development) Regulations 2023 (SI 100/2023). The list of statutory consultees was reaffirmed in the pre-application consultation close-out letter issued by ACP on the 20th of May 2026.

This section provides a summary of the engagement conducted, and responses and input received throughout this consultation period.

4.2 Pre-application consultation with ACP

Three pre-application consultation meetings were held with ACP, the competent authority, between the 16th of June 2025 and the 13th of March 2026, in accordance with the provisions of Section 287 of the Planning and Development Act 2000 (as amended). The Applicant submitted a request to An Bord Pleanála¹ to commence the pre-application process on 8th January 2025 (ABP-321635-25). The Applicant met with representatives of ACP on three occasions – the 16th June 2025; the 11th September 2025 and the 13th of March 2026.

A summary of the issues raised during the pre-application consultation process with ACP, and an accompanying directory of Applicant responses is provided in Section 2.2.1 of the Planning Report submitted in support of this application.

ACP closed the pre-application consultation and issued a letter on the 20th of May 2026. The letter listed the bodies to be consulted as part of the consultation. The Inspector's Report was made available on ACP's website.

4.3 Consultation with Selected Agencies

There was early engagement during 2023-2025 with selected agencies (e.g. MARA and WCC) to assist in defining the scope of the project in the context of the evolving regulatory environment. An email was circulated to selected agencies in January 2025 when the pre-application consultation was submitted to ACP. On 2nd October 2025, a briefing letter was circulated to selected agencies with expertise relevant to proposed methodologies and timelines, and an initial EIA scoping exercise. The letter notified these agencies of the proposed decommissioning project, and explained the need for decommissioning.

¹ An Bord Pleanála was subsequently renamed An Coimisiún Pleanála

Also provided was the relevant regulatory context, and an overview of the EIA topics to be appraised and considered.

Briefing letter contents included a request for a consultation meeting to discuss proposed methodologies and potential timeline, as well as understand issues that individual agencies may wish to raise.

The letter containing the above information was circulated to the following agencies:

- National Parks and Wildlife Service (NPWS)
- Marine Survey Office (MSO)
- Commissioners of Irish Lights (CIL)
- Irish Coast Guard
- Wicklow County Council (WCC)

In the meetings resulting from the circulation of this letter, a presentation containing an overview of proposed works and proposed environmental assessments to support the application was shared.

This presentation was entitled 'Arklow Bank Wind Park Phase I Proposed Decommissioning' and included the following items:

- An introduction to ABWP Phase I;
- A description of Proposed Works Onshore;
- A description of Proposed Works Onshore;
- The suite of documents and assessments to support the application (Proposed Scope of Planning Application)

This presentation essentially acted as a preliminary version of the non-statutory EIA Scoping Presentation, circulated in March 2026.

The issues raised in response to the circulation of the consultation letter and/or in the subsequent meeting(s) are discussed below by relevant body.

4.3.1 NPWS

Consultation meetings with the NPWS took place on 24th November 2025 and on 14th January 2026. In both meetings, the NPWS were briefed by the Applicant on current application status and scope, and the proposed decommissioning timeline.

The results of the seabed mobility assessment undertaken in the time since the initial meeting were shared in the January meeting.

Issues raised:

The 'do-nothing' scenario, involving retention of cables, transition piece and monopiles, and removal of turbines and met mast, was highlighted as a credible option to reduce environmental impact by the NPWS.

The guidance document Department Arts, Heritage and the Gaeltacht (2014) 'Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters' was shared.

The NPWS indicated that the seasonal timing of works should be considered in relation to mobile marine species and the potential for generation of displacement pressures.

The importance of due regard to the breeding period of sensitive species was also communicated.

The role of sandbank morphology and associated bird predation modes was highlighted in the context of monopile removal and associated potential for sandbank shape disruption.

Development response:

Volume 2, Chapter 2: Description of Alternatives includes a description and qualitative comparison of different alternatives to Proposed Works. In relation to Proposed Works Offshore, alternatives for offshore infrastructure considered include "do-nothing" and "retain *in situ*".

Seasonal timing restrictions are not considered necessary, as the potential for high numbers of mobile sensitive species to occur within the Offshore Site is low, and the Proposed Works Offshore are short-term and temporary.

There is limited likelihood of significant interaction with sensitive species and sufficient separation from important breeding sites.

Impacts on marine birds from prey resource changes and habitat alteration are expected to be limited, as the Offshore Site is not considered an important bird foraging area due to the absence of key prey spawning grounds such as sandeel.

4.3.2 MSO

A consultation meeting took place virtually on 12th November 2025, between the project team and the MSO. The MSO was briefed by the Applicant on current application status and scope and the proposed decommissioning timeline.

In a follow-up to this meeting, the draft Lighting and Marking Plan was shared in March 2026. A second consultation focused on a review of the suggested provisions of both reports took place with the MSO on 26th March 2026, to provide further opportunity for input and dialogue.

Issues raised in second meeting

MSO recommended that engagement be sought with the MSO in advance of vessel chartering, to confirm eligibility of vessels to operate in Ireland.

Additionally highlighted Department of Transport Guidance 'Marine Notice No. 36 of 2025 – The Maritime Navigations Safety & Emergency Response Guidance Documents for Offshore Renewable Energy Installations (OREI)'. This document provides considerations and criteria intended to address the navigational and emergency response impacts of OREIs proposed for Irish waters.

MSO confirmed that baseline data collected as part of ABWP Phase II which dates 2022 / 2023 is considered appropriate to inform the NRA and EIAR for Proposed Works Offshore, where justification is also provided.

MSO confirmed that the NRA and EIAR should focus on realistic worst-case scenarios as opposed to trying to model all potential scenarios.

MSO confirmed the reporting and marking obligations for residual monopiles left in situ, and highlighted that bathymetry undertaken post-decommissioning will need to be shared with the MSO and the UK Hydrographic Office. It was noted that charts will not necessarily specify monopile cutting depths relative to Lowest Astronomical Tide.

Development Response:

The issues raised by the MSO were noted and have been integrated into the final provisions of **EIAR Volume 3: Appendix 7.1: Navigational Risk Assessment, Appendix 3.7: Outline Lighting and Marking Plan, Appendix 3.5: Outline Vessel Management Plan**, and **EIAR Volume 2: Chapter 7: Shipping and Navigation**. Table 1.1 in both Appendices **7.1** and **3.7** act as a directory of development response(s) to issues raised by the MSO as they appear in these respective technical reports.

4.3.3 CIL

A consultation meeting with the CIL took place virtually on 10th November 2025. The CIL were briefed by the Applicant on current application status and scope and the proposed decommissioning timeline.

In a follow-up to this meeting, the draft Lighting and Marking Plan was shared in March 2026.

A second consultation, focused on a review of the suggested provisions of both reports, took place with the CIL on the 11th March 2026, to provide further opportunity for input and dialogue on these EIA topics.

Issues Raised:

No comments were raised by the CIL on the presentation.

Requirements for the shape, size, lighting and light visibility range of marine marking buoys to be deployed during the works and post-works phase of the ABWP Phase I were communicated. These included requirements pertaining to the consenting process for their deployment.

It was highlighted that AEL as the Local Lighthouse Authority (LLA), nominated under statute, would be required to notify CIL in relation to lighting plans for the duration of Proposed Works Offshore.

Project requirements for marine notices, and very high frequency (VHF) notices for radio use were outlined, as was the procedural timeline for the submission and processing of applications for these notices.

Contents of the Lighting and Marking Plan were discussed, including the need for reference to existing synthetic Automatic Identification Systems (AIS), and need for consideration to their maintenance throughout Proposed Works Offshore.

The CIL recommended liaising with the Irish Coastguard on the topic of approval and enforcement of work areas.

Development Response:

The marine marking requirements as laid out in **Appendix 3.7: Outline Lighting and Marking Plan** are in accordance with the recommendations of the CIL and the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA).

Topics pertaining to lighting and marking are also addressed in **EIAR Volume 3: Appendix 3.4 Outline Offshore Decommissioning Environmental Management Plan (DEMP)**.

Table 1.1 in both **Volume 3, Appendices 7.1: Navigation Risk Assessment** and **3.7** act as a directory of development response(s) to issues raised by the CIL as they appear in these respective technical reports.

4.3.4 IRCG

A consultation meeting with the IRCG took place virtually on 13th March 2026. The IRCG were briefed by the Applicant on current application status and scope and the proposed decommissioning timeline. The draft Lighting and Marking Plan and draft Navigational Risk Assessment were also discussed with the IRCG.

Issues Raised:

The IRCG reverted with the following documents:

- DoT (2025) 'Standard Operating Procedure (SOP) 07 2025 Offshore Renewable Energy Installation Guidance and Operational Considerations for SAR and Emergency Response and Guidance on Safety of Navigation & Emergency Response OREI'; and
- DoT (2025) 'The Maritime Navigation Safety and Emergency Response Guidance Documents for Offshore Renewable Energy Installations (OREI)'.

The IRCG did not comment on the Non-Statutory EIA Scoping Presentation.

Future IRCG engagement will be required for the review of specific plans related to, inter alia, emergency response and oil spill contingency plans.

Development Response:

The primary guidance documents used to inform the preparation of the Navigational Risk Assessment (**EIAR Volume 3: Appendix 7.1**) were, inter alia, the DoT documents provided by the IRCG.

Engagement with the IRCG will be continuous throughout the pre-application process to ensure appropriateness of relevant management and contingency plans.

4.3.5 Wicklow County Council (WCC)

A consultation meeting with the senior executive harbour engineer of WCC took place in-person on 10th November 2025. Members of WCC were briefed by the Applicant on current application status and scope and the proposed decommissioning timeline.

A second in-person meeting, inclusive of a site visit to the Onshore Site took place on 15th January 2026, with members of the Arklow Harbour and engineering divisions of WCC.

Issues Raised:

In the meeting of the 10th November 2025, the scope of the project was explained, and operational and procedural matters were raised.

At the meeting of the 15th January 2026, it was determined that the submerged oil interceptor and concrete bund located on the site would require full excavation and removal.

It was determined that the Applicant, AEL, was to carry out the demolition of the onshore substation, rather than WCC.

It was determined that the onshore export cable would require full removal to reduce future liability on WCC and potential future impact on underground works.

The need for a road-opening permit from WCC for the excavation of a public road was highlighted.

It was noted that a Risk Assessment Method Statement (RAMS) would need to be furnished to Wicklow County Council prior to the beginning of works for review.

Development Response:

Proposed Works Onshore are inclusive of the drainage, excavation and removal of the submerged oil interceptor tank, and the excavation and removal of the concrete bund. The onshore substation building structure will also be dismantled, and the Onshore Site will undergo clearance, levelling and reinstatement in line with WCC requirements. A full description of the decommissioning works designed for the Proposed Works Onshore following WCC consultation is provided in **EIAR Volume 2: Chapter 3: Proposed Works Description**.

As outlined in **Chapter 3: Proposed Works Description**, reasonable endeavors will be undertaken to fully remove the onshore cable. Some sections of this cable may however be left in situ if cable pulling becomes unfeasible. This caveat is envisaged to be of particular relevance for the portion of the cable located below the rock revetment (approximately 5m in length).

The excavation of public road does not form a part of this planning application.

A RAMS will be prepared and provided to WCC prior to the beginning of works.

4.3.6 MARA

Five pre-application consultation meetings were held with MARA, between the 26th of September 2024 and the 25th of March 2026. The dates of pre-application consultations were as follows; – 26th September 2024, 27th November 2024, 7th January 2025, 11th November 2025 and the 25th March 2026.

Briefings on the scope and methodologies of decommissioning were delivered at each meeting to provide an opportunity for MARA input. Additionally, the feedback received from other stakeholders and prescribed bodies on the scope of works and EIA considerations was shared with MARA.

In particular, as the target-cutting depth evolved throughout the EIA process, following the results of modelling and mobility assessments, and comparative assessment reports (**See EIA Volume 3: Appendix 2.1: Comparative Assessment Report**), this information was shared with MARA as a key stakeholder.

Key issues raised:

Requirements in relation to further licensing and consenting were discussed.

MARA clarified that the Decommissioning and Reinstatement Plan to be submitted to MARA in accordance with the Tri-Partite Deed would be approved in accordance with the planning permission for the Proposed Works Offshore.

MARA raised the issue of the impact of decommissioning on coastal erosion.

Development Response:

Planning permission for the Proposed Works, as detailed in **EIAR Volume 2, Chapter 3: Description of Proposed Works** is sought from ACP under Section 291 of the Planning and Development Act 2000 (as amended).

A Decommissioning and Reinstatement Plan will be submitted to MARA for approval prior to the commencement of the proposed offshore decommissioning works, if permitted.

The impact upon coastal erosion is addressed in **EIAR Volume 2, Chapter 4 – Coastal Processes, Water and Sediment Quality** and associated technical appendices. This chapter concluded, in EIA terms, there are no significant coastal erosion effects.

4.4 Pre-application consultation with Wicklow County Council – Section 247 Meeting

The coastal planning authority for the purposes of the ABWP Phase I project is Wicklow County Council (WCC), as confirmed in ACP Direction CD-022195-26, issued alongside the Inspector's Report.

A pre-application meeting, under Section 247 of the Planning and Development Act 2000, as amended, was sought with WCC on the 18th of February 2026, for the discussion of the key issues arising from the proposed decommissioning, to inform and guide detailed design of the application.

A virtual pre-application meeting took place on the 30th of March 2026. The meeting consisted of a briefing on project information, including proposed works, proposed scope of EIAR and proposed scope of planning application.

Issues regarding the residual lease for the substation site, letter of landowner consent, and display requirements for the planning application at the WCC Planning Office were raised, with the former judged to be within the remit of the Law Agent and Estates Office of WCC.

Development Response

A letter of consent to make the application has been secured from WCC. The public display of the application is in accordance with the requirements of section 291 of the Planning and Development Act.

4.5 EIA Scoping

4.5.1 Circulation of non-statutory EIAR Scoping 2026

A critical component of the ABWP Phase I planning application is the accompanying EIAR, which identifies and assesses the potential environmental effects of the Proposed Works in order to provide sufficient information for ACP to undertake an EIA.

A Non-Statutory EIA Scoping Presentation for the ABWP Phase I Proposed Works Offshore and Onshore was prepared, and circulated on the 16th of March 2026. The key components of this March 2026 report included;

- A preliminary description of the activities to be staged and executed as part of the Proposed Works Offshore and Proposed Works Onshore, and the associated timelines and embedded mitigation measures.
- An outline of the EIA Scoping Methodology, including the results of scoping for offshore, onshore and offshore/onshore combined environmental aspects respectively; and the attendant preliminary structure of the EIAR;
- An outline of the EIAR Methodology, and
- An Onshore Preliminary Ecological Appraisal, presented as an appendix.

Using this Non-Statutory EIA Scoping Presentation as the basis, AEL specifically sought feedback from the stakeholders listed in **Section BBBBBBBBBBBBBBBBBBBBBBBBBBBB.8019052** on the following topics;

- The key issues to be addressed in the EIAR;
- The proposed content of the EIAR and the potential impacts to be scoped in/out;
- The proposed assessment methodologies to assess the potential impacts scoped in; and
- Any other data that the environmental assessments should consider and address in the EIAR

Prescribed Bodies to which the non-statutory EIAR Scoping Presentation was circulated include;

- | | |
|--|--|
| • Minister for Housing, Local Government and Heritage | • Commission for Regulation of Utilities |
| • Minister for the Climate, Energy and the Environment | • Fáilte Ireland |
| • Minister for Transport | • An Taisce |
| • Minister for Defence | • Wicklow County Council |
| • Minister for Agriculture, Food and the Marine | • Wexford County Council |
| • Environmental Protection Agency | • The Eastern and Midlands Regional Assembly |
| • Maritime Area Regulatory Authority | • National Transport Authority |
| • Minister for Rural and Community Development | • Irish Aviation Authority |
| • Marine Institute | • Sustainable Energy Authority of Ireland |
| • Inland Fisheries Ireland | • Eirgrid |
| • Health and Safety Authority | • Commissioner of Irish Lights |
| | • Irish Coastguard |

A consultation period of three weeks (16th March 2026 – 7th April 2026) was provided to the bodies listed above for response to the Non-Statutory EIA Scoping Presentation, however, submissions received after this period were accepted and considered. All records of engagement have been maintained. The feedback has been assessed by the Project team, and is presented, in summary below.

4.5.2 Department of Housing, Local Government and Heritage – Development Applications Unit

Key Issues Raised:

Advised the appointment of Project Archaeologist for all stages of scheme.

Recommended that the following key elements be assessed in order to provide a reliable reference against which the likely significant effects of the decommissioning project can be assessed:

- Wrecks
- Submerged prehistoric sites and palaeolandscapes, and
- Maritime and coastal built heritage.

Indicated that the assessment of archaeological potential should include the landscape within which monuments are located, including coastal areas.

Development Response:

While the appointment of a Project Archaeologist, as envisaged in DHLGH guidance, is considered beyond the substantive requirements of the ABWP Phase I project, the Applicant has appointed a Marine Archaeological Consultant to carry out archaeological monitoring, and other supporting duties during the compilation of the EIAR and the offshore decommissioning phase as outlined in **EIAR Volume 3 Appendix 3.4: Outline Offshore DEMP**. The confinement of this role to the EIAR development and offshore decommissioning phase is considered appropriate for the scope of archaeological potential as identified in **EIAR Volume 3: Appendix 8.1: Marine Archaeology Technical Report** and **Volume 2 Chapter 8: Marine Archaeology**.

The potential impacts of the ABWP Phase I project on the key archaeological elements indicated by DHLGH are assessed in **EIAR Volume 2 Chapter 8: Marine Archaeology**.

The coastal area in which the Onshore Site is located is composed of previously disturbed and modified ground. The probability of encountering unknown archaeological or cultural heritage asset is considered very low. Direct/indirect impact on known archaeological or cultural heritage asset in the coastal area has been scoped out for this reason, as detailed in Section 1.4.3 (Scope of the EIAR) in **EIAR Volume 2: Chapter 1: Introduction**.

4.5.3 Minister for Transport

Key Issues Raised:

Advised that ducting, cables, chambers within public road that are made redundant by decommissioning process and are not under ownership/maintenance of Distribution/Transmission Network Operator are to be removed and/or made good to satisfaction of Roads Authority

Advised the developer to consult with Roads Authority regarding requirements for decommissioning of assets within public road and regarding potential for reuse of ducting following cable decommissioning

Development Response:

No ducting, cables or chambers within the public road that are not under ownership/maintenance of Distribution/Transmission Network Operator are to be made redundant by decommissioning process.

No decommissioning of assets within the public road form part of this application.

4.5.4 Maritime Area Regulatory Authority

Key Issues Raised:

Advised Applicant to be cognisant of the terms, particulars and expiry date of the Tri-Partite Agreement dated 20th June 2003.

Advised of existence of MAC (Reference no: 2022-MAC-002), granted to Sure Partners Ltd. adjacent to the proposed application location.

Advised of existence of MUL (Reference No. MUL240026) overlapping part of the proposed site area.

Noted distinction that MARA is not a development consent authority, and advised any particulars for future agreement that may require planning and environmental assessment should be a matter for ACP as the relevant consent authority.

Advised of requirement for the ACP application to address liability for residual foundations and to propose a plan for post decommissioning monitoring.

Consideration of the reuse of materials removed as a result of decommissioning advised.

Development Response:

The Applicant is cognisant of the terms and particulars of the Tri-Partite Agreement and its expiry date, as is addressed in **Section 3** of the **Planning Report**, and by the term of validity to 2033 for which planning permission is sought.

The adjacent 2022-MAC-002, granted to Sure Partners Limited and associated planning application for ABWP Phase II development have been considered in the assessment of potential cumulative effects in **EIAR Volume 2: Chapters 4 – 8**, also summarised in **Volume 2, Chapter 10: Summary of Cumulative Effects**.

The existence of MUL240026, relating to survey work for the Southeast coast and which overlaps part of the proposed site area is noted.

The application for planning permission that is supported by this Stakeholder Consultation and Engagement Report is made to An Coimisiún Pleanála as the relevant consent authority.

Proposed monitoring is summarised in **Chapter 11: Summary of Mitigation, Residual Effects and Monitoring**.

Residual liability was one of the criteria considered during the comparative assessment phase of the EIAR process, and was considered in relation to health and safety hazards and residual liability cost. This is elaborated in **EIAR Volume 2 Chapter 2: Description of Alternatives** and its supporting technical appendix in **Volume 2: Appendix 2.1: Comparative Assessment Report**.

Anticipated waste streams, including reuse of materials removed as a result of Proposed Works Offshore are estimated in **EIAR Volume 3; Appendix 3.8 Outline Offshore WMP**. Project Waste Management Objective #4 states the aim to divert as much waste as possible from landfill through prevention, reuse, recycling and recovery where practicable. Measures recommended in this Outline Offshore WMP, such as blade segmentation to preserve recovery value, transition piece clean-steel recovery and the preparation of a rotor blade circularity plan, are in service of this objective and will be elaborated upon in the Detailed Offshore WMP, to be prepared by a contractor following the achievement of relevant project consents and permissions.

4.5.5 Inland Fisheries Ireland (IFI)

Key Issues Raised:

Preference indicated for decommissioning options that would require minimal-intervention, and could be completed within the shortest time frame.

The contribution of the turbine foundations, in place for over 20 years, to the existing natural environment of predominantly soft sediment substrate, and in particular their support of established benthic communities and contribution to local biodiversity and productivity, was highlighted by the IFI.

The consideration of partial decommissioning options, such as leaving foundations below seabed level in-situ, where appropriate, was advised due to the potential for environmental impacts associated with full removal activities (noise, vibration, sediment resuspension) to disrupt migration, feeding and habitat use for migratory species including salmon, eels and sea trout.

Significant reduction of the environmental disturbance to benthic communities in the area was additionally cited as a justification for a partial decommissioning approach.

Development Response:

Consideration of potential environmental impacts during and after decommissioning activities formed a key assessment criterion during the comparative assessment phase for decommissioning options in the EIA process. The decommissioning works for which this application is made are considered to represent the most favourable and feasible alternatives with regard to environmental disturbance among other criteria. This is elaborated in **EIA Volume 2: Chapter 2: Description of Alternatives** and its supporting technical appendix in **Volume 2: Appendix 2.1: Comparative Assessment Report**.

An assessment of the potential impact of noise and vibrations caused by proposed decommissioning works on marine species including Group 2 (medium sensitivity hearing) fish, of which salmon is a member, is provided in **EIA Volume 2: Chapter 5: Marine Biodiversity**.

An assessment of the potential impact of sediment resuspension on marine species, among other receptors, is also provided in **EIA Volume 2 Chapter 5**, based on the assessment of potential effects on coastal processes, water and sediment quality contained in **EIA Volume 2, Chapter 4: Coastal Processes, Water and Sediment Quality**, and its supporting technical appendices **4.1 Seabed Mobility Assessment**, **4.2 Coastal Processes Modelling** and **4.3 Scour Assessment**.

The decommissioning option for which the ABWP Phase I planning application is made is that of partial removal of the monopile foundations, proposed to be cut below seabed level, as detailed in the **EIA Volume 2, Chapter 3: Proposed Works Description**.

4.5.6 Fáilte Ireland

Key Issues Raised:

Fáilte Ireland's 'Guidelines for the Treatment of Tourism in an EIA', a document of non-statutory guidelines were provided by the respondent.

Development Response:

The non-statutory guidelines were noted by the Applicant. The EIA Scoping Presentation (Volume 3, Appendix 1.1) and Section 1.4.3 (Scope of the EIAR) in Volume 2, Chapter 1: Introduction include a justification on why tourism has been scoped out from the EIAR.

4.5.7 Department of Agriculture, Food and the Marine (DAFM)

Key Issues Raised:

DAFM advised that a Felling License must be obtained from this Department before the felling or removal of any trees.

The considerations during the decision-making process for a felling license were also laid out.

Development Response:

The ABWP Phase I proposed decommissioning works does not provide for the felling or removal of any trees, and therefore will not seek a Felling License.

5. ENGAGEMENT WITH FISHERS AND THE MARINE COMMUNITY

5.1 Overview of Engagement

A locally-based FLO, Brendan Dillon, has been engaged on ABWP Phase I since February 2026. Local engagement with fishers and the marine community in Arklow Harbour began immediately.

5.1.1 Circulation of Fisheries Briefing Letter

Thirty-five registered fisheries vessel owners were identified in the vicinity of ABWP Phase I. These vessel owners were issued with a briefing letter on the 27th of March 2026. The objective of this letter was the sharing of project information, and the establishment of a formal liaison channel through which feedback and input could be shared. The letter provided the following information to this stakeholder community;

1. The background to the ABWP Phase I project, the need for decommissioning and a brief summary of the scope of decommissioning works;
2. The expected scope of impact to fisheries and aquaculture activity in the area;
3. The expected duration of offshore works;
4. A summary of the content and aims of the forthcoming project Fisheries Management and Mitigation Strategy (FMMS), and that this would be shared with local fishers and aquaculture once available; and
5. An introduction to the project FLO, and contact information for the FLO and the Applicant, AEL.

The FLO engaged in nine informal meetings and one phone call with individual recipients of the above letter following its distribution. These occurred throughout April and May 2026. The dates of these engagements are noted in **Appendix 4 : Schedule of Consultations** of Planning Application form appendices.

5.1.2 Preparation and Sharing of Fisheries Management and Mitigation Strategy (FMMS)

The FMMS forms part of the EIAR accompanying this application (see **Volume 3, Appendix 3.6**), as well as playing an important role in project communications and facilitation of co-existence between proposed works and local fisheries.

The FMMS was prepared in line with Irish marine planning policy and good-practice guidance for fisheries liaison and informed by fisheries data. The FMMS contributes to project stakeholder engagement through the establishment of clear fisheries liaison and communication arrangements, the provision of information on the management of fisheries interactions during work, and the outlining of procedures for managing issues and fisheries-related concerns. The FMMS has been designed to provide a clear and transparent framework for the relevant stakeholders, in line with the overarching Objectives for Project Engagement (See **Section** Error! Reference source not found.).

Ongoing fisheries and aquaculture engagement activities are planned, and include:

- The maintenance of the FLO as main point of contact with the fishing industry;
- Direct engagement with fishers and fisheries organisations; and
- Communications between offshore vessels and fishing vessels during active works.

The FMMS also provides for the potential use of Cooperation Agreements with directly-affected fishers, as appropriate. The rationale for the use of a Cooperation Agreement, procedures and evidence base requirements is outlined in **Section 5.4** of **EIAR Volume 3: Appendix 3.6 Fisheries Management and Mitigation Strategy** to provide transparency and accountability to fishers on this process.

The thirty-five original recipients of the Briefing Letter were provided with a plain-language, executive summary version of the Fisheries Management and Mitigation Strategy posted on the 18th June 2026. This Executive Summary provided an overview of the liaison structure, proposed works phasing, and available redress structure. Feedback was also invited on the proposed FMMS approach as set out.

The Applicant wishes to note that ongoing elevated level of engagement with fishers and the marine community in respect of decommissioning plans for the ABWP Phase I project is taking place against the background of a historically harmonious relationship with the local fisheries community. During the 21 years of operation of ABWP Phase I, AEL and the ABWP Phase I development itself have coexisted with local fishers and aquaculture, with no direct or indirect disturbance to fishing activity. Interactions with fishers by either AEL or ABWP Phase I have been deliberately limited throughout project lifetime.

6. CONCLUSIONS

Stakeholder engagement and consultation with prescribed bodies, and relevant agencies and bodies has informed the ABWP Phase I Proposed Works.

Engagement has been proactive, open and iterative, with many stakeholders consulted at multiple project junctures, and updated on the evolution of works and methodologies to provide opportunities for input and involvement in decision-making processes.

Awareness and understanding of ABWP Phase I has been increased among relevant stakeholders through briefing and EIA-scoping consultation campaigns. All feedback and input received has been reviewed and recorded by the Applicant and project team. As laid out in this document, this feedback raised during stakeholder engagement activities to-date has been addressed either with transparent response, or directly by project design.

The wide-ranging consultation and engagement completed to date complements the suite of technical and environmental assessments that have informed the design of ABWP Phase I.

Following engagement with stakeholders and pre-application meetings with ACP from 2024 to 2026, the Applicant has put forward a comprehensive and reasoned proposal for the decommissioning of ABWP Phase I. A full description of the Proposed Works is provided in **EIAR Volume 2: Chapter 3: Proposed Works Description**.



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