Arklow Bank Wind Park 2

Environmental Impact Assessment Report

Volume II, Chapter 2: Policy and Legislation (Revised March 2026)

sse Renewables

Version	Date	Status	Author	Reviewed by	Approved by
1.0	20/02/2024	Final (External)	GoBe Consultants	GoBe Consultants	Sure Partners Limited
2.0	03/03/2026	Final External (Revised March 2026)	GoBe Consultants	GoBe Consultants	Sure Partners Limited

Statement of Authority

Expert	Qualifications	Experience
Ellen MacMahon	BA (Hons) Geography & English, National University of Ireland, Galway. MSc Marine and Coastal Environments, Policy & Practice, National University of Ireland, Galway.	Principal Consultant with a master's in marine and coastal environments; policy & practice. 10 years' experience in marine spatial planning, the Irish offshore planning regime and associated policies and legislation.

Contents

Tables

Glossary

Term	Meaning
An Bord Pleanála (ABP)	The independent statutory body that decides on appeals from planning decisions made by local authorities in the Republic of Ireland. An Bord Pleanála also decides major strategic infrastructural projects under the provisions of the Planning and Development (Strategic Infrastructure) Act 2006 and have responsibility for determining planning permission for certain classes of development within the maritime area and for the generality of offshore development beyond the nearshore.
Arklow Bank Wind Park 2 – Offshore Infrastructure	"The Proposed Development", Arklow Bank Wind Park 2 Offshore Infrastructure: This includes all elements under the existing Maritime Area Consent.
Arklow Bank Wind Park 2 (ABWP2) (The Project)	Arklow Bank Wind Park 2 (ABWP2) (The Project) is the onshore and offshore infrastructure. This EIAR is being prepared for the Offshore Infrastructure. Consents for the Onshore Grid Infrastructure (Planning Reference 310090) and Operations Maintenance Facility (Planning Reference 211316) has been granted on 26th May 2022 and 20th July 2022, respectively. • Arklow Bank Wind Park 2 Offshore Infrastructure: This includes all elements to be consented in accordance with the Maritime Area Consent. This is the subject of this EIAR and will be referred to as 'the Proposed Development' in the EIAR. • Arklow Bank Wind Park 2 Onshore Grid Infrastructure: This relates to the onshore grid infrastructure for which planning permission has been granted. • Arklow Bank Wind Park 2 Operations and Maintenance Facility (OMF): This includes the onshore and nearshore infrastructure at the OMF, for which planning permission has been granted. • Arklow Bank Wind Park 2 EirGrid Upgrade Works: any non-contestable grid upgrade works, consent to be sought and works to be completed by EirGrid.
Competent Authority (CA)	The authority designated as responsible for performing the duties arising from the EIA Directive as amended. For this application, the Competent Authority is An Bord Pleanála.
Environmental Impact Assessment (EIA)	An Environmental Impact Assessment (EIA) is a statutory process by which certain planned Projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council (EIA Directive) and the regulations transposing the EIA Directive (EIA Regulations).

Term	Meaning
Environmental Impact Assessment Report (EIAR)	An Environmental Impact Assessment Report (EIAR) is a report of the effects, if any, which the proposed project, if carried out, would have on the environment. It is prepared by the developer to inform the EIA process.
European Directive	A "directive" is a legislative act that sets out a goal that all EU countries must achieve. However, it is up to the individual countries to devise their own laws on how to reach these goals.
Foreshore	The bed and shore, below the line of high water of ordinary or medium tides, of the sea and of every tidal river and tidal estuary and of every channel, creek, and bay of the sea or of any such river or estuary including the subsoil below, and the water column above the bed and shore and extending to the 12 nautical mile limit.
Foreshore licence	Licences granted under section 3 of the Foreshore Act 1933, as amended.
Maritime Area Consent (MAC)	A consent to occupy a specific part of the maritime area on a non-exclusive basis for the purpose of carrying out a Permitted Maritime Usage strictly in accordance with the conditions attached to the MAC granted on 22nd December 2022 with reference number 2022-MAC-002.
Natura Impact Statement (NIS)	A statement, for the purpose of Article 6 of the Habitats Directive of the implications of a proposed development, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites.
Permitted Maritime Usage	The construction and operation of an offshore windfarm and associated infrastructure (including decommissioning and other works required on foot of any permission for such offshore windfarm).
The Application	The full set of documents that will be submitted to An Bord Pleanála in support of the consent.
The Developer	Sure Partners Limited

Acronyms

Term	Meaning
AA	Appropriate Assessment
ABP	An Bord Pleanála
ABWP2	Arklow Bank Wind Park 2
ACP	An Coimisiún Pleanála
CAP23	Climate Action Plan 2023
CAP24	Climate Action Plan 2024
CBRA	Cable Burial Risk Assessment
CEN	European Committee for Standardization
CIL	Commissioners of Irish Lights
DAS	Dumping at Sea
DMAP	Designated Maritime Area Plan
DRM	Dispute Resolution Mechanism
CPO	County Policy Objective
EC	European Commission
ECMG	East Coast Monitoring Group
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMRA	Eastern and Midlands Regional Assembly
ERCoP	Emergency Response Cooperation Plan
EU	European Union
EU-IMP	EU – Integrated Maritime Policy
FLO	Fisheries Liaison Officer

Term	Meaning
FMMS	Fisheries Management and Mitigation Strategy
GHG	Greenhouse Gas
HLG	High-Level Goals
HSE	Health and Safety Executive
HWM	High-Water Mark
IAA	Irish Aviation Authority
IALA	International Organization for Marine Aids to Navigation
IMO	International Maritime Organisation
IRCG	Irish Coast Guard
ISO	International Organisation for Standardisation
LMP	Lighting and Marking Plan
LPF	Local Planning Framework
MAC	Maritime Area Consent
MAP Act	Maritime Area Planning Act 2021 (as amended)
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MPPS	Marine Planning Policy Statement
MSFD	Marine Strategy Framework Directive
MSO	Marine Survey Office
NDP	National Development Plan
NECP	National Energy and Climate Plan
NIS	Natura Impact Statement
NMPF	National Marine Planning Framework

Term	Meaning
NPF	National Policy Framework
OGI	Onshore Grid Infrastructure
OMF	Operations and Maintenance Facility
ORE	Offshore Renewable Energy
OREDP II	Offshore Renewable Energy Development Plan II
ORESS	Offshore Renewable Electricity Support Schemes
PDA	Planning and Development Act
PoM	Programme of Measures
RPO	Regional Policy Objective
RSES	Regional Spatial and Economic Strategy
SAC	Special Area of Conservation
SAR	Search and Rescue
SCI	Site of Community Importance
SOLAS	Safety of Life at Sea
SPA	Special Protection Area
VMP	Vessel Management Plan
WTG	Wind Turbine Generator

Units

Unit	Description
CO_{2eq}	Carbon dioxide equivalent
GW	Gigawatt
MW	Megawatt

2 Policy Context

Summary of Changes

This Chapter has been updated to reflect changes since submission of the planning application to An Bord Pleanála (ABP) (now An Coimisiún Pleanála (ACP)) in June 2024. All references to ABP, should be considered ACP throughout the document.

The changes that have been made are in response to the Request for Information (RFI) that was received by the Developer and matters that have been raised therein. It is confirmed that the information in this Chapter is relevant and appropriate at the point of submission (i.e. March 2026).

In summary, the following amendments have been made to this Chapter (please note that this is non-exhaustive):

This Chapter have been adjusted to ensure consideration of the latest information as appropriate to ensure consistency and accuracy including Sections 2.3, 2.5 and 2.6 to reflect the latest policy and legislation that has been enacted since June 2024.

Associated cross-references and paragraph numbering have been updated, as appropriate, to reflect the changes listed above.

Additionally, in support of the necessary changes to the chapter, it is noted that the following updates have been made to the annexes supporting this chapter:

- Revised Annexes:
  - Annex 1: NMPF Compliance Table (Revised March 2026) - – This is an updated appendix that supersedes the previous version.
- New Annexes to Appendices:
  - Annex 2: Marine Strategy Framework Directive Assessment (RFI March 2026 – This is a new annex to this appendix.
  - Annex 3: Ecosystems Function and Services Assessment (RFI March 2026) – This is a new annex to this appendix.

2.1 Introduction

2.1.1.1 This chapter of the Environmental Impact Assessment Report (EIAR) outlines the key legislative requirements relating to the Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) of the Proposed Development. It also outlines the relevant policy which underpins the Proposed Development at European Union (EU), national, regional, and local level.

2.1.1.2 The Irish climate and energy ambitions to tackle climate change includes substantial reductions of greenhouse gas emissions to facilitate a rapid transition to net zero. To succeed with Ireland's commitments towards carbon neutral emissions, a focus has been placed on renewable energy development by the Irish government. With the current ambition to reduce greenhouse gas (GHG) emissions by 51% by 2030[1] and achieve net zero before 2050,

[1] 51% reduction compared to 2005 greenhouse gas emissions.

offshore wind energy plays a unique role in the rapid transition towards the net zero carbon energy system in Ireland.

2.2 Relevant European Planning and Development Policy

2.2.1 Overview

2.2.1.1 In 2007, the EU adopted an Integrated Maritime Policy (EU-IMP) which seeks to provide a more coherent approach to cross-cutting maritime issues, with increased coordination between different policy areas such as blue growth, marine data and knowledge, integrated maritime surveillance, sea basin strategies and maritime spatial planning. EU-IMP encourages all coastal Member States to develop integrated maritime policy and plans at a national level. This has since been supported by numerous policy initiatives and legislative measures, including the European Maritime Spatial Planning Directive 2014/89/EU, the National Marine Planning Framework 2021 and the 2030 EU Climate and Energy Framework, as set out below.

2.2.2 European Marine Spatial Planning Directive

2.2.2.1 In 2014, the adoption of the European Maritime Spatial Planning Directive 2014/89/EU established an EU-wide framework for maritime spatial planning. It was aimed at promoting the sustainable growth of maritime economies, the sustainable development of marine areas and the sustainable use of marine resources. The Directive details the main goals and minimum requirements for Member States as follows:

- Balanced and sustainable territorial development of marine waters and coastal zones;
- Optimised development of maritime activities and business climate;
- Better adaptation to risks; and
- Resource-efficient and integrated coastal and maritime development.

2.2.2.2 The Directive defines maritime spatial planning as:

"*… a process by which the relevant Member State's authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives".*

2.2.2.3 Ireland transposed the Directive through the EU (Framework for Maritime Spatial Planning) Regulations 2016 (S.I. No. 352/2016). However, in October 2018 the Regulations were repealed and replaced by Part 5 of the Planning and Development (Amendment) Act 2018 which put the Directive into primary legislation and contains a number of measures that are additional to those required by the Directive. One of these measures is the establishment of the necessary legal basis and broad framework for Ireland to implement a National Marine Spatial Plan (section 2.3.4).

2.2.3 2030 EU Climate and Energy Framework

2.2.3.1 The 2030 EU Climate and Energy Framework provides a framework for climate and energy policies in Europe. It was agreed by EU leaders in 2018. This framework seeks a 40% reduction in EU GHG emissions from 1990 levels and a greater contribution from renewable energy.

2.2.3.2 Arising from this, the revised Renewable Energy Directive 2018/2001 on the promotion of the use of energy from renewable sources (recast), sets a target of at least 32% for renewable energy, at EU-wide level.

2.2.3.3 The revision of the EU Renewable Energy Directive (EU/2023/2413) known as RED III, was formally adopted in late 2023 and sets an increased EU-wide target of at least 42.5% renewable energy by 2030 with an ambition to reach 45%.

2.2.3.4 The revised Energy Efficiency Directive 2018/2002 sets a target of at least 32.5% for energy efficiency, at EU-wide level. In 2023, a revision to the Directive raises the EU energy efficiency target, making it binding for EU countries to collectively ensure an additional 11.7% reduction in energy consumption by 2030, compared to the 2020 reference scenario projections.

2.2.3.5 The EU Governance of the Energy Union and Climate Action Regulation 2018/1999 sets the overall framework for the achievement of the EU climate and energy 2030 targets.

2.2.3.6 Ireland has prepared a National Energy and Climate Plan (NECP) 2021 to 2030 (Department of Communications, Climate Action and Environment, 2020) (Table 2.1 for further details) to meet the requirements of the EU Governance of the Energy Union and Climate Action Regulation 2018/1999. This was drafted before Ireland introduced its Climate Act and before the EU increased its 2030 emissions reduction targets. Ireland is currently developing the policies necessary to reach these higher targets which it is our understanding will be reflected in a revised NECP.

2.2.4 European Green Deal and Fit for 55

2.2.4.1 The European Green Deal (European Commission (EC), 2019a) was agreed in 2021 and is the EU growth strategy to transform Europe to a climate-neutral, fair and prosperous society with a modern resource efficient and competitive economy. It aims for no net emissions of greenhouse gases by 2050 with economic growth decoupled from resource use.

2.2.4.2 To achieve climate neutrality as per Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law'), the EU has committed to increasing the greenhouse gas emission reductions targets for 2030 to at least 55%. A key route to achieving this will be the development of an energy sector based significantly on renewable resources. The "Fit for 55" package of EU reforms puts in place new initiatives with the aim of ensuring that EU policies are in line with these new climate goals.

2.2.5 REPowerEU

2.2.5.1 In response to the global energy market disruption caused by the Russian invasion of Ukraine in 2022, the EC published the REPowerEU Plan (EC, 2022). The Plan is aimed at ending the EU's dependence on Russian fossil fuels, tackling the climate crisis, and bringing about energy savings, diversifying energy supplies and accelerating the roll out of renewable energy. The Plan recognises the need to scale up and speed up the roll out of renewable energy projects. As noted in section 2.2.3, the Plan increases the headline 2030 EU renewable energy target to 42.5% with future ambition to reach 45%.

2.3 Relevant National Planning and Development Policy

2.3.1 Overview

2.3.1.1 In this section, key national planning and development policies are set out in the first instance. In addition, Table 2.1 lists the other relevant national policy documents that are applicable to the Proposed Development and provides a brief comment on their relevance.

2.3.2 Project Ireland 2040 - National Planning Framework

2.3.2.1 Project Ireland 2040 - National Planning Framework (NPF), published in July 2018 (Department of Housing, Planning and Local Government and Department of Public Expenditure and Reform, 2018), is the primary articulation of spatial, planning and land use policy in Ireland. The purpose of the framework is to guide the sustainable growth of the country over the next 20+ years. The framework aims to direct new development toward areas of existing settlement, rather than allowing the continual expansion and sprawl of cities and towns.

2.3.2.2 In April 2025, the Government adopted the First Revision to the National Planning Framework (Department of Housing, Local Government and Heritage, 2025). The National Planning Framework is the Government's high level strategic plan for shaping the future growth and development of Ireland to the year 2040 with the revised NPF providing the basis for the review and updating of regional strategies and local authority development plans.

2.3.2.3 Similar to the previous NPF published in July 2018, the first revision to the NPF contains a specific section on renewable energy. The following National Policy Objectives are included:

"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a climate neutral economy by 2050". National Policy Objective 70.

"Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development". National Policy Objective 71.

2.3.2.4 The National Development Plan 2018 to 2027 (NDP) (Department of Public Expenditure and Reform, 2018) identifies strategic priorities for public capital investment in order to underpin the implementation of the NPF. It is a strategic priority of the NDP to have a new Renewable Electricity Support Scheme to support up to 4,500 Megawatt (MW) (i.e. 4.5 Gigawatt (GW)) of additional renewable electricity by 2030 (though it is worth noting that Ireland's onshore (4 GW), offshore (5 GW) and solar (8 GW) targets far exceed this target).National Strategic Outcome 8 of the NDP is to transition to a low-carbon and climate-resilient society. To achieve this, the NDP recognises that Ireland's ambition must go further than a focus on achieving compliance with international commitments and recognises the importance of achieving a low-carbon, climate-resilient and environmentally sustainable economy and society .

2.3.3 Marine Planning Policy Statement (MPPS)

2.3.3.1 Ireland's first Marine Planning Policy Statement was published in November 2019.

2.3.3.2 The MPPS was introduced on a non-statutory basis at the time and described the existing components of Ireland's marine planning system, outlining the vision for the future development if Ireland's marine planning system. The plan also set out the overarching policies and principles expected of statutory bodies with responsibilities in or impacting on the maritime area.

2.3.3.3 Following transposition of the MAP Act in 2021, consultation on the first statutory MPPS opened in June 2025.

2.3.4 National Marine Planning Framework

2.3.4.1 The National Marine Planning Framework (NMPF) was published in July 2021. It contains overarching marine planning policies that are applicable to all proposals within Ireland's extensive maritime area. The NMPF serves as a parallel to the National Planning Framework

(section 2.3.2), as it sets out the Government's long-term planning objectives and priorities for the management of our seas over a 20-year time frame.

2.3.4.2 The main driver for the NMPF is the European Maritime Spatial Planning Directive (section 2.2.2). Public bodies are legally obliged to secure the objectives of the NMPF.

2.3.4.3 Section 13 of the NMPF relates to Offshore Renewable Energy and includes 11 planning policies, the following of which support ABWP2:

- ORE Policy 1 - Proposals that assist the State in meeting the Government's offshore renewable energy targets, including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported.
- ORE Policy 2 - Proposals must be consistent with national policy, including the OREDP and its successor. Relevant Projects designated pursuant to the Transition Protocol[2] and those Projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime.

2.3.4.4 In addition, the NMPF highlights the importance of co-existence and societal benefits of the marine area.

2.3.4.5 Annex 1 details the NMPF policy objectives and the Proposed Developments compliance with the relevant objectives.

2.3.5 Climate Action Plan 2024

2.3.5.1 The Climate Action Plan 2024 (CAP24) is the third annual update to the Climate Action Plan 2019 and was prepared by the Department of the Environment, Climate and Communications in order to tackle climate breakdown. Building on the previous year's CAP23, it is the second plan to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. CAP24 builds upon the previous plan by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. CAP24 reiterates the sentiments of the CAP23, which recognises that Ireland must significantly step up its commitments to tackle climate disruption. CAP24 pledges full and early implementation of existing policy commitments by 2030, including a target for 80% of electricity to come from renewable energy sources by 2030, with a target of at least 5 GW of offshore renewable energy. CAP23 noted that the scale of Ireland's offshore renewable opportunity has been estimated to be 70 GW.

2.3.5.2 CAP24 aims to deliver on the roadmap for renewables set out in CAP23, which includes actions to be implemented for offshore renewables including:

- The development of a system-wide plan for the delivery of Offshore Renewable Wind (ORE in Ireland by the Offshore Wind Delivery Taskforce).

2.3.5.3 The Department commits to updating the plan every 12 months in a manner that is underpinned by consultation with key stakeholders. Updates to the plan will be informed, inter alia, by corrective actions that may be needed to stay on track toward the overall 2030 targets

[2] The Transition Protocol, published alongside the General Scheme of the MPDM (as the Maritime Area Planning Act 2021 was then titled) in January 2020, provides guidance to the sector regarding the treatment of certain offshore wind projects ("Relevant Projects") in the context of the Maritime Area Planning Act 2021. The Protocol governs the approach for these projects and enables them to transition to the regime that was developed under the Maritime Area Planning (MAP) Act. ABWP2 was included as a Relevant Project under the Transition Protocol.

and the ultimate objective of achieving a transition to a competitive, low-carbon, climate-resilient, and environmentally sustainable society, and economy by 2050.

2.3.5.4 The CAP23 forth progress report (Q4 2023) is the latest and final published CAP23 progress report, published in March 2024. It reported an implementation rate of 60%, with 96 of the 161 Q4 actions completed on time. Section 4 – Electricity, of the progress report states that renewables accounted for 38.6% of electricity generation in 2022, whilst energy industries (primarily power generation) accounted for 14.4% of national emissions in 2022. There have now been four progress reports produced under Climate Action Plan 2023 (CAP23). A delivery rate of 97% was reported for Q1 2023, a delivery rate of 84% was reported for Q2 2023, a delivery rate of 33% for Q3 2023, and a delivery rate of 60% was reported for Q4 2023. Combined, this gives an overall implementation rate of 65% on CAP23 to date.

2.3.6 Climate Action Plan 2025

2.3.6.1 Climate Action Plan 2025 (CAP25) is the fourth statutory annual update to Ireland's Climate Action Plan under the Climate Action and Low Carbon Development Act 2015 (as amended).

2.3.6.2 CAP25 builds upon the 2024 Plan by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and should be read in conjunction with Climate Action Plan 2024. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development Act 2015 (as amended).

2.3.6.3 Relevant targets of 80% renewables and at least 5GW of offshore wind by 2030 remain unchanged in CAP 25.

2.3.6.4 The second report for CAP 25 (Q2 & Q3) was published in January 2026. Section 4 – Electricity states that renewables accounted for c.40% of electricity generation in Ireland in 2024, whilst energy industries (primarily electricity generation) accounted for 13% of national emissions in 2023 and the provisional emissions for 2024 are at 12%.

2.3.7 The National Energy and Climate Plan (NECP) 2021 - 2030

2.3.7.1 The National Energy and Climate Plan (NECP) 2021 - 2030 (Department of the Environment, Climate and Communications, 2024) highlights the importance of increasing and diversifying the indigenous production of clean energy sources, in particular the development of large offshore wind projects. Ireland's NECP emphasises that Ireland has one of the best offshore renewable energy resources in the world with a sea area of 900,000 square kilometres which is approximately 10 times the size of the Irish landmass.

2.3.7.2 The National Energy and Climate Plan was submitted to the European Commission in December 2023. In February 2024, the Commission published country-specific recommendations on the draft NECPs for each Member State. In July 2024 the NECP was revised to reflect feedback received from the European Commission and stakeholders. The revised NECP reaffirms the importance and commitment to offshore wind in Ireland.

2.3.8 Other relevant national policy documents

Table 2.1: Other relevant national policy documents

Policy Document	Year published	Comments
Offshore Renewable Energy Development Plan I (OREDP I) (Department of	2014	Published in 2014, Ireland's first Offshore Renewable Energy Development Plan (OREDP) provided a framework for the

Policy Document	Year published	Comments
Communications, Climate Action and Environment, 2014)		sustainable development of Ireland's ORE resources, setting out key principles, policy actions and enablers for delivery of Ireland's significant potential in this area. The OREDP I is currently guiding the State's policy approach to achieving 5GW of ORE by 2030, mostly through fixed-bottom wind turbines in relatively shallow waters of up to 70 metres off the east and southeast coasts.
Ireland's Transition to a Low Carbon Energy Future 2015-2030 (The Energy White Paper) (Department of Communications, Energy and Natural Resources, 2015)	2015	The Energy White Paper sets out a framework to guide policy up to 2030; It sets out a framework for transforming Ireland's fossil fuel-based energy sector into a clean, low carbon system by 2050. It recognises that Ireland's seas offer significant potential for offshore wind.
Offshore Renewable Energy Development Plan I (OREDP I), Interim Review (Department of Communications, Climate Action and Environment, 2018)	2018	OREDP I identifies the opportunity for the sustainable development of Ireland's abundant offshore renewable energy resources. It sets out the clear principles, policy actions and enablers for the delivery of Ireland's potential in offshore renewable energy. Action 10 of the OREDP I recommends the support of early mover projects to stimulate the supply chain and act as a clear signal that Ireland is open for business.
Draft Second Offshore Renewable Energy Development Plan (OREDP II) (Department of Communications, Climate Action and Environment, 2023)	2023	The Draft OREDP II sets out Ireland's new spatial strategy for offshore renewable energy. OREDP II will present a high-level framework for the long term planned development of offshore wind, wave and tidal energy resources and provide guidance as to where these activities will be developed in the future.
South Coast Designated Maritime Area Plan (DMAP) (Department of Climate, Energy and the Environment, 2024)	2024	The South Coast DMAP is Ireland's first statutory DMAP identifying specific offshore areas off the south coast for future offshore wind development. It creates a plan-led framework to support renewable energy deployment.
Shaping our Electricity Future (Version 1.1) (EirGrid, 2022)	2022	Shaping our Electricity Future presents a Roadmap of how Ireland can make the electricity grid ready so that 80% of Ireland's and Northern Ireland's electricity can come from renewable sources by 2030.

Policy Document	Year published	Comments
Future Framework for Offshore Renewable Energy 2025 Review (Department of Communications, Climate Action and Environment, 2025)	2025	The Future Framework 2025 Review, published in May 2025 captures ORE sectoral progress since 2024. The report provides a detailed progress update on each of the 29 actions under the Future Framework as well as an updated action plan for the coming year. Action 9 is of direct relevance to the Proposed Development and an ongoing commitment from the 2024 policy statement: *Continue to support the consenting process for ORE projects including support of necessary environmental procedures.*

2.4 Relevant Regional Planning and Development Policy

2.4.1 Regional Spatial and Economic Strategy - Eastern Midlands Regional Assembly

2.4.1.1 The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly (EMRA) was published in June 2019. The RSES is a strategic plan and investment framework to shape the future development of the region to 2031 and beyond. The EMRA includes Co. Wicklow in addition to eight other counties. Prepared in accordance with the NPF, the RSES sets the context for each local authority within the region to develop county and city development plans in a manner that will ensure national, regional, and local plans align.

2.4.1.2 The RSES for EMRA promotes decarbonising the energy sector and generating electricity from indigenous renewable sources including offshore wind. Regional Policy Objective (RPO) 10.24 of the RSES for EMRA is to:

"*Support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements*."

2.5 Relevant Local Planning and Development Policy

2.5.1 Wicklow County Development Plan 2022 - 2028

2.5.1.1 The Wicklow County Development Plan 2022-2028 (Wicklow County Council, 2022) sets out the overall strategy for the planning and sustainable development of the County for the plan period and beyond. The plan relates to the whole functional area of Wicklow County Council. There are five municipal districts, of which Arklow is one.

2.5.1.2 The Wicklow County Development Plan 2022 - 2028 includes the following objectives:

- Wind Energy Objective County Policy Objective (CPO) 16.05:

To encourage the development of wind energy in accordance with the County Wicklow Wind Energy Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:

"*consideration of any designated nature conservation areas (SACs, NHAs, SPAs, SAAOs etc) and any associated buffers;*

consideration of collision risk species (bird and bats);

impacts on Wicklow's landscape designations;

particular cognisance and regard being taken of the impact on wind turbines on residential amenity particularly with respect to noise and shadow flicker;

impacts on visual and recreational amenity;

impacts on 'material assets' such as towns, infrastructure and heritage sites;

consideration of land cover and land uses on or adjacent to the site;

best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables".

- Wind Energy Objective 16.06:

"*To facilitate and support the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required and the development of Operations and Maintenance (O&M) bases as may be required*".

- Wind Energy Objective 16.07:

"*To support community-based wind energy projects".*

2.5.2 Wicklow County Council Climate Change Adaptation Strategy (2019)

2.5.2.1 This strategy demonstrates that Wicklow County Council is fully committed to tackling climate change in order to contribute to regional and national climate action objectives. The strategy examines the future impacts and risks that climate change may have on the County and sets out actions that are designed to reduce the County's vulnerability to the effects of climate change and promotes use of sustainable energy sources.

2.5.2.2 The strategy identifies that:

"*Wicklow has a growing renewable energy sector with wind energy production both onshore and offshore... Plans to extend the offshore capacity will result in County Wicklow being an important contributor into the national grid. The electricity supply network servicing the county and crossing the county is also a key asset*."

2.5.3 Wicklow Local Economic and Community Plan 2024-2029

2.5.3.1 The Wicklow Local Economic and Community Plan (LECP) 2024–2029 (Wicklow County Council, 2024) is a six-year plan setting out the objectives and actions required to promote and support both economic development and local and community development across County Wicklow.

2.5.3.2 The plan sets out a series of high-level goals focused on sustainable economic growth, community wellbeing and environmental stewardship. These include commitments to supporting a transition to a low-carbon, climate-resilient county, consistent with national climate policy and the Local Authority Climate Action Plan 2024–2029.

2.5.3.3 Actions relating to energy, sustainability and climate mitigation are primarily set out within the parallel Wicklow Climate Action Plan 2024–2029, which is formally integrated into the LECP policy context.

2.5.3.4 The LECP sets out a number of High-Level Goals (HLG) of relevance to the Proposed Development:

HLGH1 – Climate Action

- Objective 1.5: Support the development of renewable energy opportunities, with the outcome for Wicklow to be: A county that explores all opportunities to lead in the development and provision of renewable energy, especially offshore wind energy.

HLG2 - Enterprise, Innovation and Creativity

- Objective 2.5: Support the development of the circular economy and community wealth building, outcome: New models of economic development that are innovative and sustainable in the county and to reduce the local and global environmental impact of our consumption and production
- Objective 2.6: Capitalise on natural resources such as the maritime economy ensuring nature-based solutions, outcome: A vibrant and sustainable marine economy that is environmentally innovative

2.5.3.5 The two-year implementation plan contains key actions under each of the HLG above which are of relevance to the Proposed Development:

HLGH1 – Climate action

- Objective 1.5:
- 1.4.1: Support the development of off-shore wind energy especially through the provision of infrastructure
- 1.4.2: Maximise opportunities for investment, jobs, supply chain and skills development from offshore renewable energy

HLG2 – Enterprise, Innovation and Creativity

- Objective 2.5:
  - 2.5.1: Explore opportunities to develop port infrastructure to support the offshore renewable energy sector
  - 2.5.4: Encourage local supply chain opportunities for the marine sector
- Objective 2.6:
  - 2.6.5: Develop a Renewable Energy Training Facility at Wicklow County Campus in partnership with KWETB

2.5.4 Wicklow County Council Climate Action Plan

2.5.4.1 The Wicklow County Council Climate Action Plan was published in January 2024 (Wicklow County Council, 2024). The Wicklow Climate Action Plan sets out its commitments to address climate change in line with their statutory obligations, guided by the Climate Action and Low Carbon Development (Amendment) Act 2021 and the National Climate Action Plan 2023. Wicklow's overarching goal is to transition to a climate resilient, biodiverse, sustainable, and carbon-neutral County by 2050.

2.5.4.2 Of specific relevance to the Proposed Development, Arklow has been selected as a 'Decarbonisation Zone' for County Wicklow. The action plan states that three major infrastructure projects are underway or planned to support decarbonisation. These include the Proposed Development,

"development of the Arklow Bank Wind Park adjacent to the pilot [decarbonisation] zone".

2.5.4.3 The action plan also sets out eight key goals that Wicklow County Council set out when selecting Arklow as the community that would lead the way as a pilot for decarbonisation. Goal 1 is of direct relevance to the Proposed Development:

"*To build on Arklow's status as a leader in offshore renewables as a centre of innovation for decarbonisation."*

2.5.5 Arklow and Environs Local Area Plan 2018 -2024

2.5.5.1 The Arklow and Environs Local Area Plan 2018 to 2024 (Wicklow County Council, 2024) acknowledges the benefits that the maritime sector, including offshore renewable energy, brings to the area and acknowledges that Wicklow County Council support the identification and realisation of economic opportunities within this sector.

2.5.6 Draft Arklow Local Planning Framework 2025 / Proposed Variation No. 5 Wicklow County Development Plan 2022 – 2028

2.5.6.1 The draft Arklow Local Planning Framework (LPF) 2025 / Variation No. 5 to the County Development Plan 2022 – 2028 opened for consultation in October 2025.

2.5.6.2 The draft LPF recognises the relationship between Arklow and renewable energy:

2.5.6.3 Economic Development and Employment Strategy seek to:

'To support a shift towards low carbon and climate change resilient economic and enterprise activity, reducing energy dependence, promoting the sustainable use of resources and leading in the Smart Green Economy in particular noting Arklow's designation as Co. Wicklow's first decarbonisation zone.'

2.5.6.4 Service Infrastructure Strategy for Arklow seeks to:

'To promote energy efficiency and the development of renewable energy projects; '

2.5.6.5 The designation of Arklow town as County Wicklow's Decarbonisation Zone, together with the Southern Waterfront Zone (SLO2), acknowledges the anticipated role of offshore renewable energy in the future evolution of the town, including potential change to the waterfront area associated with Arklow Bank Wind Park and related infrastructure, and identifies opportunities to build upon the renewable energy sector within the town and wider county.

2.6 Legislative context

2.6.1.1 The following sections summarise the key legislative requirements relating to the EIA and AA of the Proposed Development.

2.6.2 National Legislation

Maritime Area Planning Act (MAP) 2021

2.6.2.1 In 2021, the Irish Marine Planning regime was overhauled through new legislation, the Maritime Area Planning Act 2021 as amended (MAP Act). The MAP Act established a new State consent regime, the Maritime Area Consent (MAC) and planning process for offshore wind projects.

2.6.2.2 Granting of a MAC is the first step within the new planning process for offshore wind developments, essentially acting as the 'gateway' to the planning process.

2.6.2.3 Recognising that a number of Irish Offshore Renewable Energy projects were at an advanced stage of the planning process (under the previous foreshore regime), the Minister for the Environment, Climate and Communications enabled these projects to transition to the MAP

Act process through the granting of MACs. These projects known as 'relevant projects' are the first phase of offshore renewable energy projects in Ireland seeking consent.

2.6.2.4 Arklow Bank Wind Park 2 (ABWP2) was granted a MAC in December 2022 and is now proceeding through the planning process. This planning application will be subject to assessment and determination by An Bord Pleanála (ABP).

Climate Action and Low Carbon Development (amendment) Act 2021

2.6.2.5 In July 2021, Ireland enacted the Climate Action and Low Carbon Development (Amendment) Act. The Act binds Ireland to achieve net zero emissions by 2050 and commits to achieving 51% reduction in GHG emissions by 2030.

2.6.2.6 It also provides for a governance framework including a new system of sectoral emissions ceilings and carbon budgets. The electricity sector needs to achieve a 75% reduction in emissions by 2030 in comparison to 2018 levels. The sectoral emissions ceiling for the electricity sector in 2030 is 3 MtCO2eq. This is the most ambitious sectoral carbon budget. It is critical that large-scale offshore wind projects are facilitated if Ireland is to meet this target.

Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended)

2.6.2.7 The Planning and Development Act 2000 (as amended) establishes the foundation for planning in Ireland and combines a wide range of legislation relating to different sectors in one place. The Act sets out the process for applying for and attaining planning permission which includes the requirements for an Environmental Impact Assessment (EIA).

2.6.2.8 The main regulations that underpin the Act are the Planning and Development Regulations 2001 (S.I. No. 600 of 2001). The Regulations have been amended and are collectively called the Planning and Development Regulations 2001 to 2023.

Planning and Development Act 2024

2.6.2.9 The Planning and Development Act 2024 (PDA 2024) was transposed in October 2024. PDA 2024 repeals and replaces the 2000 Planning and Development Act. However, it is important to note that schedules will be commenced on a phased basis and therefore the full act is not yet in force.

2.6.2.10 The application for the Proposed Development was submitted under the PDA 2000 and thus the provisions of this act continue to apply.

2.7 Environmental Impact Assessment

2.7.1 European Legislation

The EIA Directive

2.7.1.1 EIA requirements are derived from Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council (EIA Directive)). The EIA Directive requires that certain projects that are likely to have significant effects on the environment be made subject to an assessment prior to development consent being given.

2.7.1.2 Article 4 of the EIA Directive makes provision for environmental impact assessments in respect of certain Projects listed in Annexes I and II of that Directive. Annex I of the EIA Directive lists developments for which EIA is mandatory and Annex II lists Projects which require a determination as to whether an environment impact assessment is required. Member States shall make that determination through a case-by-case examination or thresholds or criteria set by the Member State. Where a case-by-case examination is carried

out, or thresholds or criteria are set for the purpose of Article 4 paragraph 2 of the EIA Directive, the relevant selection criteria set out in Annex III shall be taken into account.

2.7.1.3 Paragraph 3(i), Annex II includes:

"*Installations for the harnessing of wind power for energy production (windfarms).*"

2.7.1.4 The EIA Directive is given effect in Ireland through the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).

2.7.1.5 Under Part 2, Schedule 5 of the Planning and Development Regulations 2001 (as amended),

"*Installations for the harnessing of wind power for energy production (windfarms) with more than 5 turbines or having a total output greater than 5 megawatts*"

are mandated to carry out an EIA. The Proposed Development therefore requires a mandatory EIA. The Developer is submitting an EIAR as part of the Application in order to comply with all relevant legal obligations.

2.8 Appropriate Assessment

2.8.1 European Legislation

The Habitats Directive

2.8.1.1 The Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora ('the Habitats Directive') provides legal protection for habitats and species of European importance. The Directive requires all Member States to designate, protect and manage core areas for habitat types listed in Annex I and species listed in Annex II. Member states must also establish strict protection of species listed in Annex IV.

The Birds Directive

2.8.1.2 The Council Directive 79/409/EEC on the Conservation of Wild Birds ('the Birds Directive') provides legal protection for all wild birds and threatened species and sub species listed in Annex I of the Directive through the designation of Special Protection Areas (SPAs).

2.8.2 National Legislation

Planning and Development Act 2000 and the Habitats Regulations 2011

2.8.2.1 The Habitats and Birds Directives have been transposed into Irish law by Part XAB of the Planning and Development Act, 2000 (as amended) and the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477/2011) as amended ('the Habitats Regulations'). An Appropriate Assessment (AA) is a separate but inter-related process to EIA, required under the Habitats Directive for any plan or project likely to have a significant effect on a European Site. The AA will be undertaken by the 'competent authority' An Bord Pleanála, informed by a Natura Impact Statement (NIS).

2.9 Appropriate Assessment Guidelines

2.9.1.1 The Department of Environment, Heritage and Local Government published Appropriate Assessment Guidelines for Planning Authorities (2010). In addition to this advice, the European Commission has published a number of documents which provide a significant body of guidance on the requirements of AA, including, 'Assessment of Plans and Projects Significantly Affecting Natura 2000 sites - Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (EC, 2001) and 'Managing Natura 2000 sites: The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC' (EC, 2019), which

set out the principles of how to approach decision making during the process. Other pertinent guidance documents are identified in the NIS.

2.10 References

Department of Housing, Planning and Local Government (2019) Marine Planning Policy Statement Government of Ireland (2015) The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015 – 2030. Available: Department of Communications, Energy and Natural Resources - Ireland's Transition to a Low Carbon Energy Future - 2015-2030 [Accessed 04/03/26]

Department of the Environment, Climate and Communications (2024) Ireland's National Energy and Climate Plan (NECP) 2021–2030. Available: NECP_DRAFT_BRANDED [Accessed 04/03/26]

Department of Communications, Climate Action and Environment (2014) Offshore Renewable Energy Plan (OREDP I). Available: offshore-renewable-energy-development-plan-oredp-interim-review-may-2018-0f957b1c-1bad.pdf [Accessed 04/03/26]

Department of Communications, Climate Action and Environment (2018) Interim Review of the Offshore Renewable Energy Development Plan (OREDP I). Available: offshore-renewable-energy-development-plan-oredp-interim-review-may-2018-0f957b1c-1bad.pdf [Accessed 04/03/26]

Department of Communications, Climate Action and Environment (2019) Climate Action Plan 2019. Available: climate-action-plan-2019-361e117f-27de-4060-ad45-62f4438ee840.pdf [Accessed 04/03/26]

Department of Environment, Climate and Communications (2023) Climate Action Plan 2023. Available: climate-action-plan-2023-8b7dba92-f397-4163-8293-3aea656f6b5f.pdf [Accessed 04/03/26]

Department of Environment, Climate and Communications (2023) Draft Second Offshore Renewable Energy Development Plan (OREDP II). Available: draft-offshore-renewable-energy-development-plan-ii-oredp-ii.pdf

Department of Environment, Climate and Communications (2024) Climate Action Plan 2024. Available: draft-offshore-renewable-energy-development-plan-ii-oredp-ii.pdf [Accessed 04/03/26]

Department of Climate, Energy and the Environment (2025) Climate Action Plan 2025. Available: DECC_Climate_Action_Plan_2025_Main_Report_-_Final_Web.pdf [Accessed 04/03/26]

Department of Environment, Climate and Communications (2025) Future Framework for Offshore Renewable Energy 2025 Review. Available: Future_Framework_for_Offshore_Renewable_Energy__2025_Review.pdf [Accessed 04/03/26]

Department of Climate, Energy and the Environment (2025) Draft Marine Planning Policy Statement. Available: Marine Planning Policy Statement (MPPS) [Accessed 04/03/26]

Department of Environment, Heritage and Local Government (2010) Appropriate Assessment Guidelines for Planning Authorities. Available: Appropriate Assessment of Plans and Projects in Ireland [Accessed 04/03/26]

Department of Housing, Planning and Local Government (2021) National Marine Planning Framework. Available: national-marine-planning-framework.pdf [Accessed 04/03/26]

Department of Housing, Planning and Local Government and Department of Public Expenditure and Reform (2018) Project Ireland 2040 – National Planning Framework. Available: project-2040-national-planning-framework-841f7a87-133c-4d9a-9ec7-d1d3da634105.pdf [Accessed 04/03/26]

Department of Housing, Local Government and Heritage (2025) National Planning Framework – First Revision. Available: National-Planning-Framework-First-Revision-April-2025-1.pdf [Accessed 04/03/26]

Department of Public Expenditure and Reform (2018) National Development Plan 2018-2027. Available: national-development-plan-2018-2027-4648929a-319f-4297-83f6-4350b6f76913.pdf [Accessed 04/03/26]

Eastern and Midlands Regional Assembly (2019) Regional Spatial and Economic Strategy for the Eastern and Midlands Regional. Available: EMRA-RSES.pdf [Accessed 04/03/26]

EirGrid Group (2022) Shaping our Electricity Future (Version 1.1). Available: Shaping Our Electricity Future Roadmap: Version 1.1 [Accessed 04/03/26]

European Commission (2001) Assessment of plans and projects significantly affecting Natura 2000 sites — Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. Publications Office of the European Union. Available: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021XC1028(02) [Accessed 04/03/26]

European Commission (2019) Managing Natura 2000 sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. Publications Office of the European Union. Available: Managing Natura 2000 sites — The provisions of Article 6 of the Habitats Directive 92/43/EEC [Accessed 04/03/26]

European Commission (2019a) The European Green Deal (COM(2019) 640 final). Publications Office of the European Union. Available: EUR-Lex - 52019DC0640 - EN - EUR-Lex [Accessed 04/03/26]

European Commission (2022) REPowerEU Plan. Available: EUR-Lex - 52022DC0230 - EN - EUR-Lex [Accessed 04/03/26]

European Council (2014) European Council Conclusions on 2030 Climate and Energy Policy (EUCO 169/14). Available: 145397.pdf [Accessed 04/03/26]

European Parliament, and Council of the European Union (1979) Council Directive 79/409/EEC on the conservation of wild birds (as amended). Official Journal of the European Communities. Available: EUR-Lex - 01979L0409-20100215 - EN - EUR-Lex [Accessed 04/03/26]

European Parliament, and Council of the European Union (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora. Official Journal of the European Communities. Available: Directive - 92/43 - EN - Habitats Directive - EUR-Lex [Accessed 04/03/26]

European Parliament, and Council of the European Union (2014) Directive 2014/89/EU of the European Parliament and of the Council of 23 July 2014 establishing a framework for maritime spatial planning. Official Journal of the European Union, L 257, 135–145. Available: Directive - 2014/89 - EN - EUR-Lex [Accessed 04/03/26]

European Parliament, and Council of the European Union (2018) Directive (EU) 2018/2002 amending Directive 2012/27/EU on energy efficiency. Official Journal of the European Union, L 328, 210–230. Available: DIRECTIVE (EU) 2018/ 2002 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - of 11 December 2018 - amending Directive 2012/ 27/ EU on energy efficiency [Accessed 04/03/26]

European Parliament, and Council of the European Union (2018) Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (recast). Official Journal of the European Union, L 328, 82–209. Available: Directive - 2018/2001 - EN - EUR-Lex [Accessed 04/03/26]

European Parliament, and Council of the European Union (2018) Regulation (EU) 2018/1999 on the governance of the Energy Union and climate action. Official Journal of the European Union, L 328, 1–77. Available: Regulation - 2018/1999 - EN - EUR-Lex [Accessed 04/03/26]

European Parliament, and Council of the European Union (2021) Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('European Climate Law'). Official Journal of the European Union, L 243, 1–17. Available: Regulation - 2021/1119 - EN - EUR-Lex [Accessed 04/03/26]

Government of Ireland (2018) Planning and Development (Amendment) Act. Available: pdf [Accessed 04/03/26]

Wicklow County Council (2016) Wicklow County Development Plan (2016 – 2022) Appendix 6: Wicklow Wind Energy Strategy. Available: Wicklow County Development Plan 2016 – 2022 Wind Energy Strategy [Accessed 04/03/26]

Wicklow County Council (2016) Wicklow Local Economic and Community Plan 2016-2022. Available: Layout 1 [Accessed 04/03/26]

Wicklow County Council (2018) Arklow and Environs Local Area Plan 2018-2024. Available: Microsoft Word - Arklow and Environs LAP 2018 with MD [Accessed 04/03/26]

Wicklow County Council (2019) Wicklow County Council Climate Change Adaptation Strategy. Available: Wicklow County Council Climate Change Adaptation Strategy [Accessed 04/03/26]

Wicklow County Council (2022) Wicklow County Development Plan 2022-2028. Available: Adopted Plan [Accessed 04/03/26]

Wicklow County Council (2024) Wicklow County Council Climate Action Plan. Available: wicklow.ie/Portals/0/Documents/Environment/Climate Action Plan/Wicklow County Council Climate Action Plan 15-01-24 Adopted.pdf [Accessed 04/03/26]

Annex 1 – The Proposed Development's compliance with the National Marine Planning Framework (NMPF) (Revised March 2026)

Policy Point	Description	Applicability to the Proposed Development and Compliance
Environmental – Ocean Health Policy 1	Compliance with NMPF policies relating to: Biodiversity Non-Indigenous Species Water Quality Sea-floor and Water Column Integrity Marine litter Underwater Noise should include demonstration of contribution to the relevant MSFD targets identified	Compliance with NMPF policies has been embedded into the design of the Proposed Development in so far as possible. In order to minimise significant adverse impacts on receptors, alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). Where this has not been possible, additional mitigation and monitoring measures are proposed in order to comply with certain NMPF policies. The MSFD targets are of relevance to and have been considered in the following chapters of the EIAR: Biodiversity targets (including food webs and sea-floor integrity) are addressed in the following chapters: Volume II, Chapters 6: Coastal Processes (Revised March 2026), 7: Marine Water and Sediment Quality (Revised March 2026), 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026), 10 Fish and Shellfish (Revised March 2026), 11: Marine Mammals (Revised March 2026), 12: Offshore Ornithology (Revised March 2026) and 13: Offshore Bats (Revised March 2026). No significant effects have been concluded in the EIAR for the relevant biodiversity targets. Commercial fish & shellfish targets are addressed in Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026). No significant effects have been concluded in the EIAR for the relevant commercial fish and shellfish targets. Eutrophication targets are addressed in the following chapter: Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026). No source-receptor-pathways are identified for a deterioration of dissolved oxygen, phytoplankton blooms or eutrophication, as a result of the proposed construction activities. Contaminants targets are addressed in the following chapter: Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026). No significant effects have been concluded in the EIAR for the relevant contaminant's targets. In respect of Marine Litter targets a Resource and Waste Management Plan has been submitted with the Application (Volume III, Appendix 25.1 Annex 4). Non-indigenous species targets are addressed in the following chapter: Volume II, Chapters 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026). An Invasive Non-Indigenous Species Management Plan has been submitted with the Application (Volume III, Appendix 25.4). No significant effects have been concluded in the EIAR for the relevant Non-indigenous species targets. Hydrographical conditions targets are addressed in the following Chapters of the EIAR: Volume II, Chapters 6: Coastal Processes (Revised March 2026) and 7 Marine Water and Sediment Quality (Revised March 2026). No significant effects have been concluded in the EIAR for the relevant hydrographical condition's targets. Energy (including underwater noise) targets have been addressed in the following chapters of the EIAR: Volume II, Chapters 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026), 10 Fish, Shellfish and Sea Turtle Ecology (Revised March 2026) and 11 Marine Mammals (Revised March 2026). An Underwater Noise Assessment Report has also been submitted with the Application (Volume III, Appendix 11.1). No significant effects have been concluded in the EIAR for the relevant energy targets. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assessment of the Proposed Development against four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The MSFD descriptors and associated targets of relevance have been considered in the MSFD assessment. On the basis of the assessment it is considered that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status. The Proposed Development will also not result in underwater noise levels (impulsive or continuous) that would adversely affect marine animal populations within the Irish Maritime Area or compromise the continued achievement of Good Environmental Status.
Biodiversity Policy 1	Proposals incorporating features that enhance or facilitate species adaptation or migration, or natural native habitat connectivity will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent	The EIAR that has been submitted for the Proposed Development has assessed potential significant adverse impacts on species adaptation or migrations, or on natural habitat connectivity in Volume II, Chapters 6: Coastal Processes (Revised March 2026), 7 Marine Water and Sediment Quality (Revised March 2026), 9 Benthic, Subtidal and Intertidal Ecology (Revised March 2026), 10 Fish, Shellfish and Sea Turtle Ecology (Revised

Policy Point	Description	Applicability to the Proposed Development and Compliance
	authority, and where they contribute to the policies and objectives of this NMPF. Proposals that may have significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity must demonstrate that they will, in order of preference and in accordance with legal requirements: avoid, minimise, or mitigate significant adverse impacts on species adaptation or migration, or on natural native habitat connectivity.	March 2026), 11: Marine Mammals (Revised March 2026), 12: Offshore Ornithology (Revised March 2026) and 13: Offshore Bats (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of these measures can be found in Volume II, Chapter 25: Factored -In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). In light of the conclusions of the EIAR for all other biodiversity related topics no additional 'paragraph (c)' mitigation is required in relation to impacts on species adaptation or migration or natural native habitat connectivity. Potential adverse impacts on species adaptation or migration, or on natural native habitat connectivity have been avoided. A Natura Impact Statement (NIS) has been submitted for the Proposed Development. The NIS concludes that there will be no adverse effects on the integrity of European sites. The Proposed Development therefore complies with Biodiversity Policy 1.
Biodiversity Policy 2	Proposals that protect, maintain, restore and enhance the distribution and net extent of important habitats and distribution of important species will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats.	The EIAR that has been submitted for the Proposed Development has assessed potential significant disturbance or displacement of habitats in Volume II, Chapters 6: Coastal Processes (Revised March 2026), 7: Marine Water and Sediment Quality (Revised March 2026), 9 Benthic, Subtidal and Intertidal Ecology (Revised March 2026), 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026), 11: Marine Mammals (Revised March 2026) and 12: Offshore Ornithology (Revised March 2026). Important habitats and species as defined within the NMPF are considered in the baseline environment and assessments of relevant EIAR Chapters in Volume II. Furthermore, qualifying interests, including Annex I habitats, Annex II and IV species are assessed within the NIS. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assessment of the Proposed Development against the four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The MSFD descriptors and associated targets of relevance have been considered in the MSFD assessment. On the basis of the assessment, it is considered that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status. The Proposed Development will also not result in underwater noise levels (impulsive or continuous) that would adversely affect marine animal populations within the Irish Maritime Area or compromise the continued achievement of Good Environmental Status. As habitat loss and effects to habitats are under the thresholds of 2% and 25% respectively no significant effects are expected to habitats listed as 'important' in the NMPF. Similarly, the proportion of species habitat that is exposed to the LOBE for impulsive noise and continuous noise is assessed to be under the 20% and 10% guidance thresholds respectively, therefore no significant effects are expected to species listed as 'important' in the NMPF. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored in Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors.

Policy Point	Description	Applicability to the Proposed Development and Compliance
		alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). In light of the conclusions of the EIAR, the Proposed Development will avoid significant reduction in the distribution and net extent of important habitats and other habitats that important species depend on, including avoidance of activity that may result in disturbance or displacement of habitats. An NIS has been submitted for the Proposed Development. The NIS concludes that there will be no adverse effects on the integrity of European sites.
Biodiversity Policy 3	Where marine or coastal natural capital assets are recognised by Government: Proposals must seek to enhance marine or coastal natural capital assets where possible. Proposals must demonstrate that they will in order of preference, and in accordance with legal requirements: avoid, minimise, or mitigate significant adverse impacts on marine or coastal natural capital assets, or if it is not possible to mitigate significant adverse impacts on marine or coastal natural capital assets proposals must set out the reasons for proceeding.	The EIAR that has been submitted for the Proposed Development has assessed potential significant adverse impacts on marine or coastal natural capital assets in Volume II, Chapters 6: Coastal Processes (Revised March 2026), 7 Marine Water and Sediment Quality (Revised March 2026), 9 Benthic, Subtidal and Intertidal Ecology (Revised March 2026), 10 Fish, Shellfish and Sea Turtle Ecology (Revised March 2026), 11 Marine Mammals (Revised March 2026) and 12 Offshore Ornithology (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored in Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). In light of the conclusions of the EIAR, no ‘paragraph (c)’ mitigation is required in relation to impacts on marine or coastal natural capital assets. Potential significant adverse impacts on marine or coastal natural capital assets have been avoided. The Proposed Development therefore complies with Biodiversity Policy 3.
Biodiversity Policy 4	Proposals must demonstrate that they will, in order of preference and in accordance with legal requirements: avoid, minimise, or mitigate significant disturbance to, or displacement of, highly mobile species.	The EIAR that has been submitted for the Proposed Development has assessed disturbance to or displacement of highly mobile species in Volume II, Chapters 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026), 11: Marine Mammals (Revised March 2026), 12: Offshore Ornithology (Revised March 2026) and 13: Offshore Bats (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). In light of the conclusions of the EIAR, no ‘paragraph (c)’ mitigation is required in relation to disturbance or displacement of highly mobile species. Potential significant disturbance to, or displacement of, highly mobile species, have been avoided. An NIS has been submitted for the Proposed Development. The NIS concludes that there will be no adverse effects on the integrity of European sites and therefore no adverse effects on any highly mobile species supported by such European sites. The Proposed Development therefore complies with Biodiversity Policy 4.
Protected Marine Sites Policy 1	Proposals must demonstrate that they can be implemented without adverse effects on the integrity of Special Areas of Conservation (SACs) or Special Protection Areas (SPAs). Where adverse effects from	The EIAR that has been submitted for the Proposed Development has considered SACs and SPAs in Volume II, Chapters 6: Coastal Processes (Revised March 2026), 7: Marine Water and Sediment Quality (Revised March 2026), 9: Benthic, Subtidal and Intertidal Ecology (Revised March 2026), 10: Fish, Shellfish and Sea Turtle

Policy Point	Description	Applicability to the Proposed Development and Compliance
	proposals remain following mitigation, in line with Habitats Directive Article 6(3), consent for the proposals cannot be granted unless the prerequisites set by Article 6(4) are met.	Ecology (Revised March 2026), 11: Marine Mammals (Revised March 2026) and 12: Offshore Ornithology (Revised March 2026). In addition to above, a Supporting Information for Screening for Appropriate Assessment (SISAA) Report and Natura Impact Statement (NIS) has been submitted for the Proposed Development. The NIS concludes that following the implementation of impact avoidance and the application of mitigation, there will be no adverse effects on the integrity of European sites. The Proposed Development complies with Protected Marine Sites Policy 1.
Protected Marine Sites Policy 2	Proposals supporting the objectives of protected marine sites should be supported and: be informed by appropriate guidance must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites	The NIS that has been submitted for the Proposed Development has been informed by appropriate guidance and demonstrates accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites. The Proposed Development complies with Protected Marine Sites Policy 2.
Protected Marine Sites Policy 3	Proposals that enhance a protected marine site's ability to adapt to climate change, enhancing the resilience of the protected site, should be supported and: be informed by appropriate guidance must demonstrate that they are in accordance with legal requirements, including statutory advice provided by authorities relevant to protected marine sites.	The Proposed Development is an offshore wind farm and is not located in a protected marine site. Although this policy is not directly applicable to the Proposed Development, it will make a significant contribution to the Government's target of achieving at least 5GW of offshore wind by 2030. The Proposed Development will contribute to reducing emissions from fossil fuels resulting in a positive impact on climate change and therefore a positive indirect impact on protected sites. The Proposed Development complies with Protected Marine Sites Policy 3.
Protected Marine Sites Policy 4	Until the ecological coherence of the network of protected marine sites is examined and understood, proposals should identify, by review of best available evidence (including consultation with the competent authority with responsibility for designating such areas as required), the features, under consideration at the time the application is made, that may be required to develop and further establish the network. Based upon identified features that may be required to develop and further establish the network, proposals should demonstrate that they will, in order of preference, and in accordance with legal requirements: avoid, minimise, or mitigate significant impacts on features that may be required to develop and further establish the network, or if it is not possible to mitigate significant impacts, proposals should set out the reasons for proceeding	An NIS has been submitted for the Proposed Development. The NIS concludes that there will be no adverse effects on the integrity of European sites. The Developer has engaged with National Parks and Wildlife Service (the competent authority for the designation and management of protected sites) over the course of the Application. Environmental data contained in the Government's Ecological Sensitivity Analysis of Irish Sea has also been reviewed within the EIAR. The Proposed Development is not located within a protected site. All SACs, SPAs and candidate sites as of January 2026 have been assessed in the NIS. In light of the conclusions of the EIAR no 'paragraph (c)' mitigation is required in respect of the Proposed Development. Potential adverse impacts on features that may be required to develop and further establish the network connectivity have been avoided. The Proposed Development therefore complies with Protected Marine Sites Policy 4.
Non-Indigenous Species Policy 1	Reducing the risk of the introduction and / or spread of non-indigenous species is a requirement of all proposals. Proposals must demonstrate a risk management approach to prevent the introduction of	The EIAR has assessed the risk of introduction and spread of invasive and non-native species (Volume II, Chapter 9: Benthic, Subtidal and Intertidal Ecology (Revised March 2026)). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed

Policy Point	Description	Applicability to the Proposed Development and Compliance
	and / or spread of non-indigenous species, particularly when: moving equipment, boats or livestock (for example fish or shellfish) from one water body to another, introducing structures suitable for settlement of non-indigenous species, or the spread of non-indigenous species known to exist in the area of the proposal.	Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). An Invasive Non-Indigenous Species Management Plan has been submitted for the Proposed Development (Volume III, Appendix 25.4). As demonstrated in the EIAR, the Proposed Development will demonstrate a risk management approach to prevent the introduction and or/spread of non-indigenous species. The Proposed Development complies with Non-Indigenous Species Policy 1.
Water Quality Policy 1	Proposals that may have significant adverse impacts upon water quality, including upon habitats and species beneficial to water quality, must demonstrate that they will, in order of preference and in accordance with legal requirements: avoid, minimise, or mitigate significant adverse impacts	The EIAR has assessed potential significant adverse effects on water quality (Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026), Volume III, Appendix 7.1 Water Framework Directive (Revised March 2026)). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In light of the conclusions of the EIAR, no ‘paragraph (c)’ mitigation is required in respect of the Proposed Development. Potential adverse impacts on water quality and the habitats and species beneficial to water quality have been avoided. The Proposed Development therefore complies with Water Quality Policy 1.
Water Quality Policy 2	Proposals delivering improvements to water quality, or enhancing habitats and species, which can be of benefit to water quality, should be supported.	The Proposed Development is an offshore wind farm, this policy is therefore not of relevance to this Application.
Sea-floor and Water Column Integrity Policy 1	Proposals that incorporate measures to support the resilience of marine habitats will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority and where they contribute to the policies and objectives of this NMPF. Proposals which may have significant adverse impacts on marine, particularly deep sea, habitats must demonstrate that they will, in order of preference and in accordance with legal requirements: avoid, minimise, or mitigate significant adverse impacts on marine habitats, or if it is not possible to mitigate significant adverse impacts on marine habitats must set out the reasons for proceeding.	The EIAR has assessed potential significant adverse effects marine habitats (Volume II, Chapters 6: Coastal Processes (Revised March 2026), 9 Benthic, Subtidal and Intertidal Ecology (Revised March 2026) and 10 Fish, Shellfish and Sea Turtle Ecology (Revised March 2026)). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). In light of the conclusions of the EIAR, no ‘paragraph (c)’ mitigation is required in respect of the Proposed Development. Potential adverse impacts on marine habitats been avoided. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assessment of the Proposed Development against the four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The conclusion of the MSFD assessment is that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status.

Policy Point	Description	Applicability to the Proposed Development and Compliance
		The Proposed Development therefore complies with Sea-floor and Water Column Integrity Policy 1.
Sea-floor and Water Column Integrity Policy 2	Proposals, including those that increase access to the maritime area, must demonstrate that they will, in order of preference and in accordance with legal requirements: avoid, minimise, or mitigate adverse impacts on important habitats and species.	The EIAR has assessed potential adverse impacts on important habitats and species in Volume II, Chapters 6: Coastal Processes (Revised March 2026), 9 Benthic, Subtidal and Intertidal Ecology (Revised March 2026) , 10 Fish, Shellfish and Sea Turtle Ecology (Revised March 2026), 11 Marine Mammals (Revised March 2026) and 12 Offshore Ornithology (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026) In light of the conclusions of the EIAR, no 'paragraph (c)' mitigation is required in respect of the Proposed Development. Potential adverse impacts on important habitats and species have been avoided. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assessment of the Proposed Development against the four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The conclusion of the MSFD assessment is that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status. The Proposed Development therefore complies with Sea-floor and Water Column Integrity Policy 2.
Sea-floor and Water Column Integrity Policy 3	Proposals that protect, maintain, restore and enhance coastal habitats for ecosystem functioning and provision of ecosystem services will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must take account of the space required for coastal habitats, for ecosystem functioning and provision of ecosystem services, and demonstrate that they will, in order of preference and in accordance with legal requirements: avoid, minimise , or mitigate for net loss of coastal habitat.	The EIAR has assessed loss of coastal habitat in Volume II, Chapter 6: Coastal Processes (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored in Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026) In light of the conclusions of the EIAR, no 'paragraph (c)' mitigation is required in respect of the Proposed Development, net loss of coastal habitats has been avoided. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assessment of the Proposed Development against the four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The conclusion of the MSFD assessment is that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status.

Policy Point	Description	Applicability to the Proposed Development and Compliance
		The Proposed Development therefore complies with Sea-floor and Water Column Integrity Policy 3.
Marine Litter Policy 1	Proposals that facilitate waste re-use or recycling, or that reduce marine and coastal litter will be supported, where they contribute to the policies and objectives of this NMPF. Proposals that could potentially increase the amount of litter that is discharged into the maritime area, either intentionally or accidentally, must include measures (such as development of a waste management plan) to, in order of preference and in accordance with legal requirements: avoid, minimise, or mitigate the litter. Demonstration of these measures must provide satisfactory evidence that the proposal is able to manage all waste without creation of litter.	An EIAR has been submitted for the Proposed Development. In compliance with Marine Litter Policy 1, a Resource and Waste Management Plan has been submitted with the Application (Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026), Annex 4). The Resource and Waste Management Plan provides the information necessary to guide and support the compliant and efficient management of wastes associated with the Proposed Development. That information includes estimating the types and quantities of wastes to arise and establishing the controls and procedures that will be applied in managing the wastes in compliance with the relevant regulations, policy and guidance. The Proposed Development complies with Marine Litter Policy 1.
Underwater Noise Policy 1	Proposals must take account of spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna. Where the potential for significant impact on marine fauna from underwater noise is identified, a Noise Assessment Statement must be prepared by the proposer of development. The findings of the Noise Assessment Statement should demonstrably inform determination(s) related to the activity proposed and the carrying out of the activity itself. The content of the Noise Assessment Statement should be relevant to the particular circumstances and must include: Demonstration of compliance with applicable legal requirements, such as necessary assessment of proposals likely to have underwater noise implications, including but not limited to: Appropriate Assessment (AA); Environmental Impact Assessment (EIA); Strategic Environmental Assessment (SEA); Specific response to ‘strict protection’ requirements of Article 12 of the Habitats Directive in relation to certain species listed in Annex IV of the Directive; and Species protected under the Wildlife Acts. An assessment of the potential impact of the development or use on the affected species in terms of environmental sustainability; Demonstration that significant adverse impacts on marine fauna resulting from underwater noise will, in	The EIAR has assessed the spatial distribution, temporal extent and levels of impulsive and/or continuous sound (underwater noise) in Volume II, Chapters 9: Benthic, Subtidal and Intertidal Ecology (Revised March 2026), 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026) and 11: Marine Mammals (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In light of the conclusions of the EIAR, no ‘paragraph (c)’ mitigation is required in respect of the Proposed Development. Potential adverse impacts on marine fauna due to the spatial distribution, temporal extent and levels of impulsive and/or continuous sound have been avoided. The Proposed Development therefore complies with Underwater Noise Policy 1. The assessment of the impact of the Proposed Development in the EIAR and NIS took account of spatial distribution, temporal extent, and levels of impulsive and / or continuous sound (underwater noise) that may be generated and the potential for significant adverse impacts on marine fauna. This included a Noise Assessment Statement (Volume III, Appendix 11.2) The assessments concluded that there will be no significant adverse effects from underwater noise. The Proposed Development therefore complies with Underwater Noise Policy 1. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assessment of the Proposed Development against the four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The conclusion of the MSFD assessment is that the Proposed Development will not result in underwater noise levels (impulsive or continuous) that would adversely affect marine animal populations within the Irish Maritime Area or compromise the continued achievement of Good Environmental Status

Policy Point	Description	Applicability to the Proposed Development and Compliance
	order of preference and in accordance with legal requirements be: avoided, minimised, or mitigated, or if it is not possible to mitigate significant adverse impacts on marine fauna, the reasons for proceeding must be set out. This policy should be included as part of statutory environmental assessments where such assessments require consideration of underwater noise.	
Air Quality Policy 1	Proposals that support a reduction in air pollution should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals must demonstrate consideration of their contribution to air pollution, both direct and cumulative.	An EIAR has been submitted for the Proposed Development. Potential effects on air quality from the Proposed Development have been scoped out of the EIAR (as detailed in Volume II, Chapter 20: Air Quality and Climate (Revised March 2026)) with the following justification: The assessment of potential impacts on air quality typically addresses the potential for impacts from dust and traffic/plant emissions on nearby sensitive receptors. As the Proposed Development relates to the construction of offshore infrastructure only there is no potential for dust impacts. Furthermore, due to the distance between the Array Area and the shore (minimum 6 km), any potential impacts that might arise from emissions associated with plant or marine vessels are unlikely to give rise to likely significant effects due to the dispersal of emissions. There is unlikely to be potential for significant air quality impacts during the operational and maintenance or decommissioning phases of the Proposed Development. Therefore, the assessment of potential effects on air quality are not included in the scope of the EIAR. The Proposed Development will make a significant contribution to the Government's target of achieving at least 5GW of offshore wind by 2030. The Proposed Development will contribute to reducing emissions from fossil fuels resulting in a positive impact indirect effect on air pollution. The Proposed Development complies with Air Quality Policy 1.
Air Quality Policy 2	Where proposals are likely to result in or facilitate an increase in air pollution, proposals should demonstrate that they will, in order of preference in accordance with legal requirements and standards: avoid, minimise, or mitigate air pollution.	An EIAR has been submitted for the Proposed Development. Potential effects on air quality from the Proposed Development have been scoped out of the EIAR (as detailed in Volume II, Chapter 20: Air Quality and Climate (Revised March 2026)) with the following justification: The assessment of potential impacts on air quality typically addresses the potential for impacts from dust and traffic/plant emissions on nearby sensitive receptors. As the Proposed Development relates to the construction of offshore infrastructure only there is no potential for dust impacts. Furthermore, due to the distance between the Array Area and the shore (minimum 6 km), any potential impacts that might arise from emissions associated with plant or marine vessels are unlikely to give rise to likely significant effects due to the dispersal of emissions. There is unlikely to be potential for significant air quality impacts during the operational and maintenance or decommissioning phases of the Proposed Development. Therefore, the assessment of potential effects on air quality are not included in the scope of the EIAR. The Proposed Development will make a significant contribution to the Government's target of achieving at least 5GW of offshore wind by 2030. The Proposed Development will contribute to reducing emissions from fossil fuels resulting in a positive impact indirect effect on air pollution. Air Quality Policy 2 is therefore not applicable to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
Climate Change Policy 1	Proposals should demonstrate how they: avoid contribution to adverse changes to physical features of the coast; enhance, restore or recreate habitats that provide a flood defence or carbon sequestration ecosystem services where possible. Where potential significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services are identified, these must be in order of preference and in accordance with legal requirements: avoided, minimised, mitigated, if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out. This policy should be included as part of statutory environmental assessments where such assessments are required.	The EIAR has assessed adverse changes to physical features of the coast and habitats that provide a flood defence or carbon sequestration ecosystem service in Volume II, Chapters 6: Coastal Processes (Revised March 2026) and 9 Benthic Subtidal and Intertidal Ecology (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). In light of the conclusions of the EIAR, the Proposed Development will avoid contribution to adverse changes to physical features of the coast and habitats that provide a flood defence or carbon sequestration ecosystem service. The Proposed Development complies with Climate Change Policy 1.
Climate Change Policy 2	For the lifetime of the proposal, the following climate change matters must be demonstrated: estimation of likely generation of greenhouse gas emissions, both direct and indirect; measures to support reductions in greenhouse gas emissions where possible; likely impact of climate change effects upon the proposal from factors including but not limited to: sea level rise, ocean acidification, changing weather patterns; measures incorporated to enable adaptation climate change effects; likely impact upon climate change adaptation measures adopted in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities; where likely impact upon climate change adaptation measures in the coastal area relevant to the proposal and/or adaptation measures adopted by adjacent activities is identified, these impacts must be in order of preference and in accordance with legal requirements: avoided, minimised, mitigated, if it is not possible to mitigate significant adverse impacts, the reasons for proceeding must be set out.	The contributions to and reduction of greenhouse gas emissions from the Proposed Development have been assessed in Volume II, Chapter 20: Air Quality and Climate (Revised March 2026). The Proposed Development is an offshore wind farm. Over its anticipated 36.5 year operational lifespan, the Proposed Development will result in a beneficial impact on greenhouse gas emissions. The Proposed Development will more than offset the emissions produced during construction and decommissioning. Based upon the predicted energy generation during its operational and maintenance phase, it will take the project approximately three years from the start of operation, to ‘pay back’ the predicted total carbon generation for construction, operation, and decommissioning. This is based upon the predicted Republic of Ireland grid intensity over the operational period. It would then deliver annual savings for each of the following years of operation. Predicted sea level rise has been factored into the design of the offshore infrastructure. Good engineering practice has been employed on the design, giving an appropriate safety margin where required (which will take into account increased storm frequency and intensity). In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report presenting the assessment of the potential vulnerabilities and risks to the Proposed Development from climate change scenarios has been provided (Volume III, Appendix 20.1: Climate Change Risk Assessment (RFI March 2026)). The assessment reviews the positive or negative effects climate change may have, and the resilience of the Proposed Development to those effects during the construction, operation and maintenance, and decommissioning phases. Volume II, Chapter 20: Air Quality and Climate (Revised March 2026) also considers the need for appropriate mitigation and monitoring measures necessary to address any identified significant effects. The Proposed Development therefore complies with Climate Change Policy 2.
Co-existence Policy 1	Proposals should demonstrate that they have considered how to optimise the use of space, including through consideration of opportunities for co-existence and co-operation with other activities, enhancing other activities where appropriate. If proposals cannot avoid significant adverse impacts	The EIAR has assessed co-existence and co-operation with other activities in Volume II, 14 Commercial Fisheries (Revised March 2026), 15 Shipping & Navigation (Revised March 2026), 16 Civil and Military Aviation (Revised March 2026), 19 Infrastructure and Other Users (Revised March 2026) and 21 Population and Human Health (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed

Policy Point	Description	Applicability to the Proposed Development and Compliance
	(including displacement) on other activities they must, in order of preference: minimise significant adverse impacts, mitigate significant adverse impacts, or if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). For Commercial Fisheries, specifically loss of grounds or restricted access to fishing grounds within the Cable Corridor and Working Area paragraph (b) mitigation has been applied in the form of ongoing liaison through the appointed Fisheries Liaison Officer, cooperation agreements where appropriate, and provisions for disruption payments/compensation mechanisms where verified disruption or loss of access is attributable to project activities, with the objective of minimising displacement and supporting co-existence. In addition, SSER operate within the agreed Seafood ORE Working Group Communications Protocol. The Developer commits to following Guidance on Dispute Resolution developed by the Seafood / ORE Working Group (2024). This includes use of the Dispute Resolution Mechanism (DRM) defined by the Seafood / ORE Working Group (2024) as a voluntary mediation process, which offers a timely and cost-effective means of resolving disputes. The Proposed Development therefore complies with Co-existence Policy 1.
Infrastructure Policy 1	Appropriate land-based infrastructure which facilitates marine activity (and vice versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industries should be supported.	During the lifetime of ABWP2 , it is expected that €4.8billion will be spent on the development, construction, operation and decommissioning of the wind farm. During the development and construction phase, it is expected that ABWP2 will support 430 annualised fulltime equivalent (aFTEs) jobs across Wicklow and Wexford and 1,720 aFTEs in Ireland. During its operation phase it is expected that ABWP2 will support 60 jobs in Wicklow and Wexford per annum and 100 jobs in Ireland per annum. ABWP2 will indirectly facilitate the diversification or regeneration of marine industries and therefore complies with Infrastructure Policy 1.
Access Policy 1	Proposals, including in relation to tourism and recreation, should demonstrate that they will, in order of preference: avoid, minimise, or mitigate significant adverse impacts on public access.	The EIAR has assessed impacts on tourism and recreation in Volume II, Chapter 21: Population and Human Health (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026) In light of the conclusions of the EIAR, no ‘paragraph (c)’ mitigation is required in respect of the Proposed Development. Significant adverse impacts on public access are avoided. The Proposed Development therefore complies with Access Policy 1.
Access Policy 2	Proposals demonstrating appropriate enhanced and inclusive public access to and within the maritime area, and that consider the future provision of services for tourism and recreation activities, should be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF.	The Proposed Development is not a tourism development; therefore Access Policy 2 is not of relevance.

Policy Point	Description	Applicability to the Proposed Development and Compliance
Employment Policy 1	Proposals should demonstrate contribution to a net increase in marine related employment in Ireland, particularly where the proposals are: in line with the skills available in Irish coastal communities adjacent to the maritime area; improve the sustainable use of natural resources; diversify skills to enable employment in emerging industries.	A Socioeconomic Impact Report has been submitted for the Proposed Development (Volume III, Appendix 21.1: Socio Economic Impact Report). During the lifetime of ABWP2 it is expected that €4.8billion will be spent on the development, construction, operation and decommissioning of the wind farm. During the development and construction phase it is expected that ABWP2 will support 430 annualised fulltime equivalent (aFTEs) jobs across Wicklow and Wexford and 1,720 aFTEs in Ireland. During its operation phase it is expected that ABWP2 will support 60 jobs in Wicklow and Wexford per annum and 100 jobs in Ireland per annum. ABWP2 will contribute to a net increase in marine related employment in Wicklow and Wexford and therefore complies with Employment Policy 1.
Heritage Assets Policy 1	Proposals that demonstrate they will contribute to enhancing the significance of heritage assets will be supported, subject to the outcome of statutory environmental assessment processes and subsequent decision by the competent authority, and where they contribute to the policies and objectives of this NMPF. Proposals unable to contribute to enhancing the significance of heritage assets will only be supported if they demonstrate that they will, in order of preference: avoid, minimise, or mitigate harm to the significance of heritage assets, and if it is not possible, to mitigate harm, then the public benefits for proceeding with the proposal must outweigh the harm to the significance of the heritage assets. (see definition of 'Public Benefits' in the Glossary)	The EIAR has assessed impacts heritage assets in Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). It should be noted that the EIAR for the Proposed Development has concluded a significant effect on indirect impact on the setting of terrestrial cultural heritage sites within the cumulative impact assessment, which cannot be mitigated. To comply Heritage Assets Policy 1, the public benefits for proceeding with the Proposed Development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). The Proposed Development therefore complies with Heritage Assets Policy 1.
Rural Coastal and Island Communities Policy 1	Proposals contributing to access, communications, energy self-sufficiency or sustainability of rural coastal and / or island communities should be supported. Proposals should ideally be inclusive of continual education, skills development and training in marine sectors, thus improving the sustainability, social benefits and economic resilience of rural and island communities.	A Socioeconomic Impact Report has been submitted for the Proposed Development (Volume III, Appendix 21.1: Socio Economic Impact Report) During the lifetime of the ABWP2 it is expected that €4.8billion will be spent on the development, construction, operation and decommissioning of the wind farm. During the development and construction phase it is expected that ABWP2 will support 430 annualised fulltime equivalent (aFTEs) jobs across Wicklow and Wexford and 1,720 aFTEs in Ireland. During its operation phase it is expected that ABWP2 will support 60 jobs in Wicklow and Wexford per annum and 100 jobs in Ireland per annum. ABWP2 was not successful in the first round of the Government's Offshore Renewable Electricity Support Scheme (ORESS) scheme, however, SPL remains fully committed to delivering the Project and to providing a community benefit fund. Without an ORESS support contract, ABWP2 is not in a position to deliver a community fund under the ORESS scheme. However, SPL is pleased to be able to commit to providing a fund of €3m per annum for the duration of an alternative route to market (corporate power purchase agreement) contract (Volume III, Appendix 3.1, Consultation Report, Annex A).

Policy Point	Description	Applicability to the Proposed Development and Compliance
		ABWP2 will indirectly facilitate continual education, skills development and training in marine sectors, thus improving the sustainability, social benefits and economic resilience of rural communities. The Proposed Development complies with Rural Coastal and Island Communities Policy 1.
Seascape and Landscape Policy 1	Proposals should demonstrate how the likely significant impacts of a development on the seascape and landscape of an area have been considered. Proposals will only be supported if they demonstrate that they, in order of preference: avoid, minimise, or mitigate significant adverse impacts on the seascape and landscape of the area. If it is not possible to mitigate significant adverse impacts, proposals must set out the reasons for proceeding. This policy should be included as part of statutory environmental assessments.	The EIAR has assessed impacts on the seascape and landscape in Volume II, Chapter 17 SLVIA (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives The layout of WTGs and Offshore Substation Platforms (OSPs) have been designed in such a way as to minimise the impacts on Seascape, Landscape, Visual Impacts Assessment (SLVIA) where possible. White aviation lights will be fully cut off so that practically no light will be emitted below the horizontal. However, despite the use of factored in measures significant adverse impacts on the seascape and landscape of the area cannot be mitigated. To comply with Seascape and Landscape Policy 1, the public benefits of proceeding with the Proposed Development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). In following the mitigation hierarchy and setting out the public benefits of proceeding with the Proposed Development, the Proposed Development complies with this Seascape and Landscape Policy 1.
Social Benefits Policy 1	Proposals that enhance or promote social benefits should be supported. Proposals unable to enhance or promote social benefits should demonstrate that they will, in order of preference: minimise, or mitigate significant adverse impacts which result in the displacement of other existing or authorised (but yet to be implemented) activities that generate social benefits.	During the lifetime of ABWP2 it is expected that €4.8billion will be spent on the development, construction, operation and decommissioning of the wind farm. A Socioeconomic Impact Report has been submitted for the Proposed Development (Volume III, Appendix 21.1: Socio Economic Impact Report). During the development and construction phase it is expected that ABWP2 will support 430 annualised fulltime equivalent (aFTEs) jobs across Wicklow and Wexford and 1,720 aFTEs in Ireland. During its operation phase it is expected that ABWP2 will support 60 jobs in Wicklow and Wexford per annum and 100 jobs in Ireland per annum. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). In order to minimise significant adverse impacts on receptors. alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026) Impacts on activities that generate social benefits have been assessed in the EIAR in Volume II, Chapter 15: Shipping & Navigation (Revised March 2026), Chapter 19: Infrastructure and Other Users (Revised March 2026), and Chapter 21: Population and Human Health (Revised March 2026). The Proposed Development will not have adverse impacts activities that generate social benefits.

Policy Point	Description	Applicability to the Proposed Development and Compliance
		ABWP2 was not successful in the first round of the Government's ORESS scheme, however, SPL remains fully committed to delivering the project and to providing a community benefit fund. Without an ORESS support contract, ABWP2 is not in a position to deliver a community fund under with the ORESS scheme. However, SPL is pleased to be able to commit to providing a fund of €3m per annum for the duration of an alternative route to market (corporate power purchase agreement) contract. ABWP2 and the community benefit fund aligns with Social Benefits Policy 1.
Social Benefits Policy 2	Proposals that increase the understanding and enjoyment of the marine environment (including its natural, historic and social value), or that promote conservation management and increased education and skills, should be supported.	The Proposed Development is for an offshore wind farm. As such, Social Benefits Policy 2 is not of relevance to the Proposed Development.
Transboundary Policy 1	Proposals that have transboundary impacts beyond the maritime area, on either the terrestrial environment or neighbouring international jurisdictions, must show evidence of consultation with the relevant public authorities, including terrestrial planning authorities and other country authorities. Proposals should consider transboundary impacts throughout the lifetime of the proposed activity.	Transboundary stakeholders were consulted on the Proposed Development through the 2020 and 2023 scoping report consultation (Volume III, Appendix 3.1: Consultation Report). In addition, transboundary consultation occurred during the statutory consultation period on the application submitted in June 2024. A screening for potential transboundary impacts has been undertaken for the Proposed Development (Volume III, Appendix 3.3: Transboundary Impact Screening (Revised March 2026)). Where potential transboundary impacts have been screened in, an assessment of these impacts has been undertaken. The EIAR concludes that there are no significant transboundary effects arising from the Proposed Development. The Proposed Development complies with Transboundary Policy 1.
Aquaculture Policy 1	Proposals for sustainable development of aquaculture that: demonstrate use of innovative approaches, and / or contribute to diversification of species being grown in a given locality, particularly proposals applying a multi-trophic approach, and / or enhances resilience to the effects of climate change should be supported.	The Proposed Development is for an offshore wind farm. As such, Aquaculture Policy 1 is not of relevance to the Proposed Development.
Aquaculture Policy 2	Non-aquaculture proposals in aquaculture production areas must demonstrate consideration of, and compatibility with, aquaculture production. Where compatibility is not possible, proposals must demonstrate that they will, in order of preference: avoid; minimise; mitigate significant adverse impacts on aquaculture. If it is not possible to mitigate significant adverse impacts upon aquaculture, proposals should set out the reasons for proceeding.	The EIAR has assessed impacts on aquaculture in Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026). The Proposed Development is not located within an aquaculture production area and is 5.28km away from the nearest production site. The EIAR concludes that there will be no significant impacts on aquaculture. The Proposed Development therefore complies with Aquaculture Policy 2.
Aquaculture Policy 3	Land-based coastal infrastructure that is critical to and supports development of aquaculture should be supported, in accordance with any legal requirements and provided environmental safeguards contained within authorisation processes are fully met	The Proposed Development is for an offshore wind farm. As such, Aquaculture Policy 3 is not of relevance to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
Defence and Security Policy 1	Any proposal that has the potential to interfere with the performance by the Defence Forces of their security and non-security related tasks must be subject to consultation with the Defence Organisation. This includes potential interference with: Safety of navigation and access to naval facilities; Firing, test or exercise areas; Communication, and surveillance systems; Fishery protection functions. Proposals should only be supported where, having consulted with the Defence Organisation, they are satisfied that it will not result in unacceptable interference with the performance by the Defence Forces of their security and non-security related tasks. Any proposal will be subject to the relevant Environmental Assessments, as set out in the introduction to this NMPF.	The Department of Defence has been consulted throughout the development of the Application (Volume II, Chapter 16: Civil and Military Aviation (Revised March 2026)). Impacts on defence and security have been assessed in Volume II, Chapter 15: Shipping and Navigation (Revised March 2026) and Volume II, Chapter 16: Aviation and Radar (Revised March 2026). No significant effects have been concluded on the receptors assessed and it can be concluded that the Proposed Development does not have any potential to interfere with the performance by the Defence Forces of their security and non-security related tasks.
Natural Gas Storage Policy 1	Subject to assessments required for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), natural gas storage proposals should be supported.	The Proposed Development is for an offshore wind farm. As such, Natural Gas Policy 1 is not of relevance to the Proposed Development.
ORE Policy 1	Proposals that assist the State in meeting the Government's offshore renewable energy targets, including the target of achieving 5GW of capacity in offshore wind by 2030 and proposals that maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets, should be supported. All proposals will be rigorously assessed to ensure compliance with environmental standards and seek to minimise impacts on the marine environment, marine ecology and other maritime users.	The Proposed Development is an offshore wind farm. The Proposed Development will make a direct contribution (16%) to the Government's target of achieving 5GW of capacity in offshore wind by 2030 and maximise the long-term shift from use of fossil fuels to renewable electricity energy, in line with decarbonisation targets as documented in Volume II, Chapter 20: Air Quality and Climate (Revised March 2026). Volume II of the EIAR presents a rigorous assessment to ensure compliance with environmental standards. Through the implementation of measures and additional mitigation for some impacts, impacts on the marine environment, marine ecology and other maritime users are minimised. The Proposed Development complies with ORE Policy 1.
ORE Policy 2	Proposals must be consistent with national policy, including the Offshore Renewable Energy Development Plan (OREDP) and its successor. Relevant Projects designated pursuant to the Transition Protocol and those projects that can objectively enable delivery on the Government's 2030 targets will be prioritised for assessment under the new consenting regime. Into the future, areas designated for offshore energy development, under the Designated Marine Area Plan process set out in the Maritime Area Planning Bill, will underpin a plan-led approach to consenting (or development of our marine resources) (Note – see Appendix D on Spatial Designation Process).	Volume II, Chapter 1: Introduction (Revised March 2026) and Chapter 2: Policy and Legislation (Revised March 2026) sets out how the Proposed Development complies with national policy including Offshore Renewable Energy Development Plan (OREDP). The Proposed Development is included in the OREDP Assessment Area 2 (East Coast South). The Proposed Development is a Phase 1 project under the Transition Protocol. The Proposed Development complies with ORE Policy 2.
ORE Policy 3	Any non-ORE proposals that are in or could affect sites held under a permission or that are subject to an	The Proposed Development is for an offshore wind farm. As such, ORE Policy 3 is not of relevance to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	ongoing permitting or consenting process for renewable energy generation (wind, wave or tidal should demonstrate that they will in order of preference: avoid, minimise, mitigate adverse impacts, or if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding. Applicants for non-ORE proposals in or affecting ORE sites should engage ORE developers in consultation during the pre-application processes as appropriate.	
ORE Policy 4	Decisions on ORE developments should be informed by consideration of space required for other activities of national importance described in the NMPF.	An EIAR has been submitted for the Proposed Development. The Proposed Development has been assessed alongside other activities of national importance through the cumulative impact assessments in Volume II, Chapters 6 – 22 and as summarised in Volume II, Chapter 24: summary of Cumulative Effects (Revised March 2026). The Proposed Development complies with ORE Policy 4.
ORE Policy 5	Proposals for activity that may adversely impact ORE test projects by virtue of being within or adjacent to ORE test sites, or between site and landfall of ORE test projects that may adversely impact ORE test site projects, should demonstrate that they will in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts.	The Proposed Development is for an offshore wind farm and will not affect other ORE test projects. As such, ORE Policy 5 is not of relevance to the Proposed Development.
ORE Policy 6	Proposals for infrastructure enabling local use of excess energy generated from emerging marine technologies (wave, tidal, floating wind) should be supported.	The Proposed Development is a fixed bottom offshore wind farm. As such, ORE Policy 6 is not of relevance to the Proposed Development.
ORE Policy 7	Where potential for ports to contribute to ORE is identified, plans and policies related to this port must encourage development in such a way as to facilitate ORE and related supply chain activity.	ORE Policy 7 is not of relevance to the Proposed Development.
ORE Policy 8	Proposals for ORE must demonstrate consideration of existing cables passing through or adjacent to areas for development, making sure ability to repair and carry out cable-related remedial work is not significantly compromised. This consideration should be included as part of statutory environmental assessments where such assessments are required.	An EIAR has been submitted for the Proposed Development. An assessment of the impact of the Proposed Development on the existing Arklow Bank Wind Park 1 infrastructure (which is surrounded by the Proposed Development) has been carried out in Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026). This assessment has concluded that remedial works for ABWP1 will not be significantly compromised by the Proposed Development. There are no other existing cables passing through or adjacent to areas for development. The Proposed Development complies with ORE Policy 7.
ORE Policy 9	A permission for ORE must be informed by inclusion of a visualisation assessment that supports conditions on any development in relation to design and layout. Where a development consent is applied for in an	An EIAR has been submitted for the Proposed Development. A visual assessment has been undertaken as part of the EIAR in Volume II, Chapter 17: Seascape, Landscape and Impact Assessment (Revised March 2026). Visualisations have also been produced as part of the EIAR and

Policy Point	Description	Applicability to the Proposed Development and Compliance
	area already subject to permission, proposals must include a visualisation assessment to inform design and layout. Visualisation assessments should demonstrate consultation with communities that may be able to view the proposal, in addition to any other ORE development, which had received consent to proceed at a given site at the time the consent application is made, with the aim of minimising impact. Visualisation assessments will be informed by specific emerging guidelines (detailed in the actions set out in Annexes to this NMPF). Prior to specific guidelines being available, policy and best practice relating to visualisation assessment should be used. This consideration must be included as part of statutory environmental assessments where such assessment is required.	to inform the visual assessment (Volume III, Appendices 17.3 and 17.4 SLVIA Visuals, Project Design Option One and 2 (Revised March 2026), respectively). The visual assessment has been carried out using best practice guidance. The Developer has also engaged extensively with local and national stakeholders over the last number of years in preparation for submitting the Application (Volume III, Appendix 3.1: Consultation Report). The Proposed Development complies with ORE Policy 9.
ORE Policy 10	Opportunities for land-based, coastal infrastructure that is critical to and supports development of ORE should be prioritised in plans and policies, where possible.	The Proposed Development is an offshore wind farm. As such, ORE Policy 10 is not of relevance to the Proposed Development.
ORE Policy 11	Where appropriate, proposals that enable the provision of emerging renewable energy technologies and associated supply chains will be supported.	The Proposed Development has received a design flexibility opinion from ABP. This flexibility will allow for the Proposed Development to avail of emerging WTG technology in advance of construction.
Petroleum Policy 1	Proposals in areas where petroleum activities or petroleum production infrastructure have already been approved, or where applications consistent with the Government's prohibition on new exploration activity are under consideration, should only be authorised where compatibility with the existing, authorised or proposed activity can be satisfactorily demonstrated or the proposal is clearly of strategic or national importance. Compatibility should be achieved, in order of preference, through: avoiding, or minimising, or mitigating adverse impacts. If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	The Proposed Development is for an offshore wind farm. The Proposed Development is not within or near any authorised or proposed petroleum activity sites. As such, Petroleum Policy 1 is not of relevance to the Proposed Development.
Petroleum Policy 2	Proposals potentially affecting future potential activity in areas (blocks) subject to existing petroleum authorisations should avoid sterilisation of that area for future petroleum-related activity consistent with Government policy, and demonstrate how they, in order of preference: avoid, or minimise, or mitigate potential adverse impacts on those activities.	The Proposed Development is for an offshore wind farm. The Proposed Development is not within or near any authorised or proposed petroleum activity sites. As such, Petroleum Policy 2 is not of relevance to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	
Transmission Policy 1	Subject to the appropriate environmental assessments, electricity transmission proposals that maintain or improve the security and diversity of Ireland's energy supply should be supported, including interconnectors, relevant EU Projects of Common Interest (PCIs), and projects in receipt of relevant alternative EU priority energy infrastructure classification provided for by the EU TEN-E regulations. This should include development of the offshore transmission system and connection with the onshore transmission system necessary to meet the Government's target of 5 GW of offshore renewables by 2030, as well as development of associated transmission system / interconnector infrastructure for hybrid offshore projects, connecting offshore renewable energy installations with Ireland and one or more other electricity transmission systems.	The Proposed Development is an offshore wind farm. The Proposed Development will make a direct contribution (16%) to the Government's target of achieving 5GW of capacity in offshore wind by 2030. A detailed assessment of the carbon savings attributable to the Proposed Development is provided in Volume II, Chapter 20: Air Quality and Climate (Revised March 2026). As a source of domestic renewable energy, the Proposed Development will improve the security and diversity of Ireland's electricity supply. In May 2022, the Developer received planning approval for the onshore grid infrastructure (OGI) (Case Reference: 310090). The Proposed Development complies with Transmission Policy 1.
Transmission Policy 2	Proposals for activities that are in or could affect energy transmission proposals in sites held under a permission or that are subject to an ongoing permitting or consenting process for energy transmission proposals should demonstrate that they will, in order of preference: avoid, minimise, mitigate adverse impacts, or if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	The Proposed Development is for an offshore wind farm. The Proposed Development is not within or near any transmission sites that are subject to ongoing permission or consenting. An assessment of the Proposed Development's potential impact on an existing offshore wind farm which is surrounded by the Proposed Development (ABWP1) has been carried out in Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026). This assessment has concluded no significant adverse effects on the existing ABWP1 infrastructure. The Proposed Development complies with Transmission Policy 2.
Transmission Policy 3	Decisions on transmission developments should be informed by consideration of space required for other activities of national importance described in the NMPF.	The Proposed Development is for an offshore wind farm. The Proposed Development is not a transmission development. As such, Transmission Policy 3 is not of relevance to the Proposed Development.
Transmission Policy 4	Where possible, opportunities for land-based, coastal infrastructure that is critical to and supports energy transmission should be prioritised in plans and policies. Designation of land-based zones for the purposes of co-ordination and integration with relevant Marine Plans must be considered, where appropriate.	The Proposed Development is for an offshore wind farm. The Proposed Development does not facilitate transmission development. Transmission Policy 4 is not of relevance to the Proposed Development.
Transmission Policy 5	Proposals for construction or operation activities within one nautical mile of either of the two existing natural gas interconnector pipelines shall be avoided. If construction or operation activities are proposed to take place within one nautical mile of either of the two existing natural gas interconnector pipelines, the	The Proposed Development is not located within one nautical mile of the either of the two existing natural gas interconnector pipelines. As such, Transmission Policy 5 is not of relevance to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures put in place or the proposed activities altered. If construction or operation activities involve the crossing of either of the two existing natural gas interconnector pipelines by other pipelines or cables, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures be put in place or the proposed activities altered.	
Transmission Policy 6	Subject to required assessments for the protection of the environment, and only where in keeping with the outcome of the review of the security of energy supply of Ireland's electricity and natural gas systems (which is being carried out by Department of the Environment, Climate and Communications), and not involving the importation of fracked gas, additional proposals for natural gas transmission/ import infrastructure should be supported.	The Proposed Development is for an offshore wind farm. As such, Transmission Policy 6 is not of relevance to the Proposed Development.
Fisheries Policy 1	Proposals that may have significant adverse impacts on access for existing fishing activities, must demonstrate that they will, in order of preference: avoid, minimise, or mitigate such impacts. If it is not possible to mitigate significant adverse impacts on fishing activity, the public benefits for proceeding with the proposal that outweigh the significant adverse impacts on existing fishing activity must be demonstrated.	The EIAR has assessed potential significant adverse impacts on fishing activity in Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. A number of measures of relevance to Fisheries Policy 1 will be implemented via the FMMS (Volume III, Appendix 25.3) (Revised March 2026)) including ongoing liaison through the appointed Fisheries Liaison Officer, cooperation agreements where appropriate, and provisions for disruption payments/compensation mechanisms where verified disruption or loss of access is attributable to project activities, with the objective of minimising displacement and supporting co-existence. In addition, SSER operate within the agreed Seafood ORE Working Group Communications Protocol.. Through the implementation of the measures the majority of impacts on existing fisheries have been minimised and 'paragraph (c)' mitigation is not required in respect of the Proposed Development. One impact (Loss of grounds or restricted access to fishing grounds within the Cable Corridor and Working Area) requires additional mitigation (paragraph c), the proposed mitigation is cooperation agreements and associated payments. The Proposed Development will minimise and mitigate significant adverse impacts on access for existing fishing activities. As such, the Proposed Development complies with Fisheries Policy 1.
Fisheries Policy 2	Where significant impact upon fishing activity arising from any proposal is identified, a Fisheries Management and Mitigation Strategy (FMMS) should be prepared by the proposer of development or other maritime area use, in consultation with local fishing interests and other interests as appropriate. All efforts should be made to agree the FMMS with those interests. Those interests should also undertake to engage with the proposer and provide best available, transparent and accurate information and data in a	An FMMS has been submitted with the Application (Volume III, Appendix 25.3: Fisheries Management and Mitigation Strategy (Revised March 2026)). In line with the requirements of the NMPF, industry standards and good practice, the FMMS has the following key primary functions: To ensure that appropriate liaison channels with the fishing industry are established and that effective liaison is maintained throughout the construction, operation and maintenance and decommissioning phases of the Proposed Development; and

Policy Point	Description	Applicability to the Proposed Development and Compliance
	timely manner to help complete the FMMS. The FMMS should be drawn up as part of readying a proposal prior to submission, with measures identified to be considered in finalising conditions of any authorisations granted. Development of the strategy should be coordinated with other relevant assessments such as EIA where possible. The content of the Fisheries Management and Mitigation Strategy (FMMS) should be relevant to the particular circumstances and could include: An assessment of the potential impact of all stages of the development or other suggested use on the affected fishery or fisheries, both in socio-economic terms and in relation to environmental sustainability. This assessment should include consideration of any impact upon cultural identity within fishing communities, as well as identifying indirect / in-combination matters. A recognition that the disruption to existing fishing opportunities / activity should be minimised as far as possible. Demonstration of the public benefit(s) that outweigh the significant impacts identified. Reasonable measures to mitigate any constraints which the proposed development or use may place on existing or proposed fishing activity. Reasonable measures to mitigate any potential impacts on sustainability of fish stocks (e.g. impacts on spawning grounds or areas of fish or shellfish abundance) and any socio-economic impacts. Where it does not prove possible to agree the FMMS with all interests: Divergent views and the reasons for any divergence of views between the parties should be fully explained in the FMMS, and dissenting views should be given a platform within the said FMMS to make their case. Where divergent views are identified, relevant public authorities should be engaged to identify informal and formal steps designed to enable proposal(s) to progress.	To define appropriate management and mitigation measures to minimise potential impacts on fishing activities and facilitate co-existence throughout the construction, operation and maintenance and decommissioning of the Proposed Development. The Developer commits to following the Seafood / Offshore Renewable Energy (ORE) Working Group Summary guidance (Seafood/ORE Working Group, 2023), including the principles for engagement. The Developer commits to effective engagement built upon mutual respect, best endeavours to reach agreement and recognition of the importance of the seafood/fisheries sector. The Proposed Development complies with Fisheries Policy 2.
Fisheries Policy 3	Proposals that enhance the sustainability of fisheries or support a sustainable fishing industry, including the industry's diversification and or enhanced resilience to the effects of climate change, should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	The Proposed Development is not a proposal to enhance fisheries sustainability. As such, Fisheries Policy 3 is not of relevance to the Proposed Development.
Fisheries Policy 4	Infrastructural proposals that enable access to fishing activities should be supported provided they fully meet the environmental safeguards contained within authorisation processes.	The Proposed Development is not a proposal to enhance access to fishing. As such, Fisheries Policy 4 is not of relevance to the Proposed Development.
Fisheries Policy 5	Proposals, regardless of the type of activity they relate to, enhancing essential fish habitat, including	An EIAR has been submitted for the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	spawning, nursery and feeding grounds, and migratory routes should be supported. If proposals cannot enhance essential fish habitat, they must demonstrate that they will, in order of preference: avoid; minimise; mitigate significant adverse impact on essential fish habitat, including spawning, nursery and feeding grounds, and migration route If it is not possible to mitigate significant adverse impact on essential fish habitat, proposals must set out the reasons for proceeding	A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). The impact of the Proposed Development on fish habitat, spawning, nursery and feeding grounds and migratory routes has been assessed in Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026). In light of the conclusions of the EIAR, no 'paragraph (c)' mitigation is required in respect of the Proposed Development. Potential adverse impacts on fish habitat, spawning, nursery and feeding grounds and migratory routes have been avoided. The Proposed Development therefore complies with Fisheries Policy 5. In response to the Request for Further Information (RFI) made by An Coimisiún Pleanála (ACP) (formerly An Bord Pleanála) regarding the planning application (case-reference 319864) for the Proposed Development, a new report demonstrating the assesment of the Proposed Development against the four MSFD thresholds (habitat loss (D6C4), adverse effects on habitats (D6C5), impulsive noise (D11C1) and continuous noise (D11C2)) is provided in Volume II, Chapter 2: Policy and Legislation, Annex 2 (RFI March 2026). The conclusion of the MSFD assessment is that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status.
Fisheries Policy 6	Ports and harbours should seek to engage with fishing and other relevant stakeholders at an early stage to discuss any changes in infrastructure that may affect them. Any port or harbour developments should take account of the needs of the dependent fishing fleets with a view to avoiding commercial harm where possible. Where a port or harbour has reached a minimum level of infrastructure required to support a viable fishing fleet, there should be a presumption in favour of maintaining this infrastructure, provided there is an ongoing requirement for it to remain in place and that it continues to be fit for purpose.	The Proposed Development is not a port or harbour development. As such, Fisheries Policy 6 is not of relevance to the Proposed Development.
Mineral Exploration and Mining Policy 1	Only proposals which are in line with national policy on mineral exploration and mining should be considered, provided they fully meet the environmental safeguards contained within the mineral exploration and mining consent processes.	The Proposed Development is not a proposal for mineral exploration or mining. As such, Mineral Exploration and Mining Policy 1 is not of relevance to the Proposed Development.
Ports, Harbours and Shipping Policy 1	To provide for shipping activity and freedom of navigation the following factors will be taken into account when reaching decisions regarding development and use: The extent to which the locational decision interferes with existing or planned routes used by shipping, access to ports and harbours and navigational safety. This includes commercial anchorages and approaches to ports as well as key littoral and offshore routes;	An EIAR has been submitted for the Proposed Development. Impacts on shipping, navigation, ports and anchorages are assessed in Volume II, Chapter 15: Shipping and Navigation. A Navigational Risk Assessment has been submitted with the Application (Volume III, Appendix 15.1 (Revised March 2026)). The following Factored-in Measures have been applied: Use of 'rolling'/temporary 500 m advisory safe passing distances surrounding the location of all proposed/fixed structures where work is being undertaken by a construction or maintenance vessel;

Policy Point	Description	Applicability to the Proposed Development and Compliance
	A mandatory Navigation Risk Assessment; Where interference is likely: whether reasonable alternatives can be identified; and Where there are no reasonable alternatives: whether mitigation through measures adopted in accordance with the principles and procedures established by the International Maritime Organisation can be achieved at no significant cost to the shipping or ports sector.	Use of 'rolling'/temporary 500 m advisory clearance distances around installation/maintenance vessels; Use of 50 m advisory safe passing distances around all surface structures up until the point of commissioning; Appropriate vessel health and safety including IMO conventions and HSE requirements; Cable Burial Risk Assessment (CBRA) undertaken pre-construction including consideration of under keel clearance and appropriate cable protection applied based upon the outcomes; Charting of all structures associated with the Proposed Development on relevant nautical and electronic charts; Compliance from all project vessels with Irish Law, international maritime regulations as adopted by the relevant flag state including the Convention on the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/77) and International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974); Consideration of MGN 654 (MCA, 2021) guidance with respect to WTG design and construction; Creation and implementation of an Emergency Response Cooperation Plan (ERCoP) (Volume III, Appendix 25.5: Emergency Response Cooperation Plan); Implementation of a buoyed construction/decommissioning area around the Array Area during the respective phases; Lighting and marking in accordance with IALA Guidance G1162 (IALA, 2021) and Irish Lights requirements during both the construction and operational and maintenance phases (Volume III, Appendix 25.6: Lighting and Marking Plan); Marine pollution contingency planning; Marine coordination; Creation and implementation of a Vessel Management Plan (VMP), including operational procedures such as the use of entry/exit points to manage the movement of project vessels (Volume III, Appendix 25.7: Vessel Management Plan); Minimum WTG blade clearance above Mean High Water Spring (MHWS) of at least 22 m in line with UK MCA and RYA Guidance; Circulation of information via Notice to Mariners (NtM) and other appropriate means including a Fisheries Liaison Officer (FLO); Provision of self-help capability; Use of a temporary guard vessel where justified by risk assessment, e.g. to protect unlit structures and/or unprotected cable prior to burial; Vessel traffic monitoring by Automatic Identification System (AIS) during the construction phase; and Any water depths reductions from subsea project infrastructure that of more than 5% referenced to chart datum will be consulted on with the MSO. With the implementation of the Factored in measures, the Proposed Development will provide for shipping activity and freedom of navigation. The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 1.
Ports, Harbours and Shipping Policy 2	Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference: avoid, minimise, or mitigate significant adverse impacts, and if it is not possible to mitigate significant adverse impacts on current activity and future opportunity for expansion of port and harbour activities, proposals should set out the reasons for proceeding.	An EIAR has been submitted for the Proposed Development. Port access restrictions have been assessed Volume II, Chapter 15: Shipping and Navigation (Revised March 2026). The conclusions of the EIAR are that through the implementation of the following factored-in measures: Circulation of information Marine coordination Implementation of VMP the significance of effect is broadly acceptable, which is not significant in EIA terms. The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 2.
Ports, Harbours and Shipping Policy 3	Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities must demonstrate	Port access restrictions have been assessed Volume II, Chapter 15: Shipping and Navigation (Revised March 2026). The significance of effect on port access restrictions is broadly acceptable, which is not significant in EIA terms.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	consideration of the National Ports Policy, the National Planning Framework, and relevant provisions related to the TEN-T network.	The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 3.
Ports, Harbours and Shipping Policy 4	Proposals within ports limits, beside or in the vicinity of ports, and / or that impact upon the main routes of significance to a port, must demonstrate within applications that they have: been informed by consultation at pre-application stage or earlier with the relevant port authority; have carried out a navigational risk assessment including an analysis of maritime traffic in the area; and have consulted Department of Transport, MSO and Commissioners of Irish Lights. Applicants must continue to engage parties identified in pre-application processes as appropriate during the decision-making process	An EIAR has been submitted for the Proposed Development. A Navigational Risk Assessment has been submitted with the Application (Volume III, Appendix 15.1 (Revised March 2026)). Ports, harbours and shipping stakeholders were consulted throughout the development of the EIAR. The consultees included: Port of Cork Company (POCC) Dublin port IRCG Irish Chamber of Shipping Irish Ferries Irish Lights MSO IAA Arklow Sea Scouts; and RNLI Stena Line The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 4.
Ports, Harbours and Shipping Policy 5	Proposals for capital dredging will be supported where it is necessary to safeguard national port capacity and Ireland's international connectivity, and where required compliance assessments associated with authorisations have been carried out and incorporated into subsequent competent authority decision(s).	The Proposed Development is an offshore wind farm and not a capital dredging project. As such, Ports, Harbours and Shipping Policy 5 is not of relevance to the Proposed Development.
Ports, Harbours and Shipping Policy 6	In areas of authorised dredging activity, including those subject to navigational dredging, proposals for other activities will not be supported unless they are compatible with the dredging activity.	An existing dredging licence for operational and maintenance dredging associated with ABWP1 is in close proximity to the Proposed Development. The impact of the Proposed Development on ABWP1 has been assessed in Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026). The Proposed Development will not have a significant adverse impact on the existing ABWP1 infrastructure or operations. There are no other areas of authorised dredging which may be affected by the Proposed Development. The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 6.
Ports, Harbours and Shipping Policy 7	Proposals for maintenance dredging activity will be supported where: relevant decisions by competent authorities incorporate the outcome of statutory environmental assessment processes, as well as necessary compliance assessments associated with authorisations, including in relation to the planning process; there will be no significant adverse impact on marine activities or uses or the maritime area. Any potential adverse impact will be, in order of preference, avoided, minimised or mitigated; dredged waste is managed in accordance with internationally agreed hierarchy of waste	The Proposed Development is an offshore wind farm and not a maintenance dredging project. As such, Ports, Harbours and Shipping Policy 7 is not of relevance to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	management options for sea disposal; • if disposing of dredged material at sea, existing registered disposal sites are used, in preference to new disposal sites; and where they contribute to the policies and objectives of this NMPF	
Ports, Harbours and Shipping Policy 8	Proposals that cause significant adverse impacts on licensed disposal areas should not be supported. Proposals that cannot avoid such impact must, in order of preference minimise, mitigate, or if it is not possible to mitigate the significant adverse impacts, proposals must set out the reasons for proceeding.	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). An existing dredging licence for operational and maintenance dredging associated with ABWP1 and dumping location is located in close proximity to the Proposed Development. The impact of the Proposed Development on ABWP1 has been assessed in Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026). Arklow Energy Limited secured a permit for seabed levelling undertaken via plough dredging in an area to the east of ABWP1 that is approximately 700m in length and 100m in width (Permit Number: S0027-01). The application relates to the dumping of up to 99,999 tonnes of material over an 8-year period from 1 July 2017 to 31 May 2025. As per the Licence and Enforcement Access Portal on the Environmental Protection Agency website, “Arklow Energy Ltd” have not undertaken any activity under the permit Reg. S0027-01 over the reporting calendar year 2022 and reported no plans to undertake any activity during 2023. As the permit has been granted until 2025, cessation of activities will occur before construction of the Proposed Development is anticipated to begin. The Dumping at Sea licence holder (Arklow Energy Ltd) have confirmed with the EPA that they did not undertake any of the activities under this licence (Ref: https://leap.epa.ie/licence-profile/S0027/compliance/return/cc5776c4-2471-ef11-a36a-b687df52d074) and they have stated "We Arklow Energy Ltd have not undertaken any activity under the permit Reg. S0027-01 over the reporting calendar year 2023, and currently have no plans to undertake any activity during 2024. No particle or sediment sampling has been undertaken as no activities were undertaken under the permit Reg. S0027-01” In light of the conclusions of the EIAR, no ‘paragraph (b)’ mitigation is required in respect of the Proposed Development. Significant adverse impacts on licenced disposal areas are minimised. The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 8.
Ports, Harbours and Shipping Policy 9	Proposals for the management of dredged material must demonstrate that they have been assessed against the waste hierarchy (see Glossary).	During the construction and operational and maintenance phase of the Proposed Development, localised dredging and management of dredged material is expected to occur. The environmental impact of this material has been assessed in the EIAR. The Proposed Development will require a Dumping at Sea (DAS) licence from the EPA prior to construction. The assessment of the dredged material against the waste hierarchy will be presented within the DAS application. The Proposed Development therefore complies with Ports, Harbours and Shipping Policy 9.
Ports, Harbours and Shipping Policy 10	Proposals identifying new dredge disposal sites which are subject to best practice and guidance from previous studies should be supported where:	The Proposed Development identifies an indicative location for the dumping of dredged material (associated with the Proposed Development). The proposed location is within the boundary of the Proposed Development and has been assessed in the EIAR (Volume II, Chapter 6: Coastal Processes (Revised March 2026) and Volume III, Appendix 6.1 Marine Physical Processes Numerical Modelling (Revised March 2026)).

Policy Point	Description	Applicability to the Proposed Development and Compliance
	competent authority decisions incorporate necessary compliance assessments associated with authorisations; and they contribute to the policies and objectives of this NMPF. Proposals must include an adequate characterisation study, be assessed against the waste hierarchy and must be informed by consultation with all relevant stakeholders.	A dumping at sea licence will be required for the Proposed Development in advance of construction.
Safety at Sea Policy 1	Proposals for installation, operation, and decommissioning of Offshore Wind Farms must demonstrate how they will: Minimise navigational risk between commercial vessels arising from an increase in the density of vessels in maritime space as a result of wind farm layout; and Allow for recreational vessels within the Offshore Wind Farm (including consideration of turbine height) or redirect recreational vessels, minimising navigational risk arising between recreational and commercial vessels.	An EIAR has been submitted for the Proposed Development. Impacts on commercial and recreational vessels are assessed in Volume II, Chapter 15: Shipping and Navigation. A Navigational Risk Assessment has been submitted with the Application (Volume III, Appendix 15.1 (Revised March 2026)). A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). The following Factored-in Measures have been applied in order to minimise navigational risk: Use of 'rolling'/temporary 500 m advisory safe passing distances surrounding the location of all proposed/fixed structures where work is being undertaken by a construction or maintenance vessel; Use of 'rolling'/temporary 500 m advisory clearance distances around installation/maintenance vessels; Use of 50 m advisory safe passing distances around all surface structures up until the point of commissioning; Appropriate vessel health and safety including IMO conventions and HSE requirements; Cable Burial Risk Assessment (CBRA) undertaken pre-construction including consideration of under keel clearance and appropriate cable protection applied based upon the outcomes; Charting of all structures associated with the Proposed Development on relevant nautical and electronic charts; Compliance from all project vessels with Irish Law, international maritime regulations as adopted by the relevant flag state including the Convention on the International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/77) and International Convention for the Safety of Life at Sea (SOLAS) (IMO, 1974); Consideration of MGN 654 (MCA, 2021) guidance with respect to WTG design and construction; Creation and implementation of an Emergency Response Cooperation Plan (ERCoP) (Volume III, Appendix 25.5: Emergency Response Cooperation Plan); Implementation of a buoyed construction/decommissioning area around the Array Area during the respective phases; Lighting and marking in accordance with IALA Guidance G1162 (IALA, 2021) and Irish Lights requirements during both the construction and operational and maintenance phases (Volume III, Appendix 25.6: Lighting and Marking Plan (Revised March 2026)); Marine pollution contingency planning; Marine coordination; Creation and implementation of a Vessel Management Plan (VMP), including operational procedures such as the use of entry/exit points to manage the movement of project vessels (Volume III, Appendix 25.7: Vessel Management Plan); Minimum WTG blade clearance above Mean High Water Spring (MHWS) of at least 22 m in line with UK MCA and RYA Guidance; Circulation of information via Notice to Mariners (NtM) and other appropriate means including a Fisheries Liaison Officer (FLO); Provision of self-help capability; Use of a temporary guard vessel where justified by risk assessment, e.g. to protect unlit structures and/or unprotected cable prior to burial;

Policy Point	Description	Applicability to the Proposed Development and Compliance
		Vessel traffic monitoring by Automatic Identification System (AIS) during the construction phase; and Any water depths reductions from subsea project infrastructure that of more than 5% referenced to chart datum will be consulted on with the MSO. Internal navigational is possible, with recreational navigation being at the discretion of each individual users. The EIAR concludes that this risk is ALARP, not significant in EIA terms. The Proposed Development complies with Safety at Sea Policy 1.
Safety at Sea Policy 2	Proposals for infrastructure that have the potential to significantly reduce under-keel clearance must demonstrate how they will, in order of preference: avoid, minimise mitigate adverse impacts, or if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). Of relevance to Safety at Sea Policy 2, a CBRA will be undertaken pre-construction including consideration of under keel clearance and appropriate cable protection applied based upon the outcomes. Cable will be buried where possible, cable protection will be utilised where identified as necessary. The implementation of this factored-in measure will ensure cable protection is sufficient to limit cable interaction and under keel clearance risks. In light of the conclusions of the EIAR, no ‘paragraph (b)‘mitigation is required in respect of the Proposed Development. Potential to significantly reduce under-keel clearance is minimised. The Proposed Development complies with Safety at Sea Policy 2.
Safety at Sea Policy 3	All proposals for temporary or permanent fixed infrastructure in the maritime area must ensure navigational marking in accordance with appropriate international standards and ensure inclusion in relevant charts where applicable.	Lighting and marking as directed by Irish Lights and in compliance with the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162 (IALA, 2021) and charting have been committed to by the Developer as factored in measures. A Lighting and Marking Plan (LMP) has been submitted for the Proposed Development (Volume III, Appendix 25.6 (Revised March 2026)). The Proposed Development complies with Safety at Sea Policy 3.
Safety at Sea Policy 4	Establishing, changing or disestablishing Aids to Navigation (AtoN) must be sanctioned, in advance of works, by the Commissioners of Irish Lights.	A Lighting and Marking Plan (LMP) has been submitted for the Proposed Development (Volume III, Appendix 25.6 (Revised March 2026)). The Proposed Development complies with Safety at Sea Policy 4.
Safety at Sea Policy 5	Proposals must identify their potential impact, if any, on Maritime Emergency Response (Search and Rescue (SAR), Maritime Casualty and Pollution Response) operations. Where a proposal may have a significant impact on these operations it must demonstrate how it will, in order of preference: avoid, minimise, mitigate adverse impacts, or if it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). Vessel traffic data assessed in Volume II, Chapter 15: Shipping & Navigation (Revised March 2026) includes the capture of data relating to military vessels. Of relevance to Maritime Emergency Response factored-in measures include

Policy Point	Description	Applicability to the Proposed Development and Compliance
	proceeding, supported by parties responsible for maritime SAR.	Provision of self-help capability Implementation of ERCoP Implementation of MPCP The Developer also commits to an additional measure of consultation with the IRCG on SAR access. The Proposed Development (in compliance with paragraph c) has mitigated impacts, on Maritime Emergency Response (Search and Rescue (SAR), Maritime Casualty and Pollution Response) operations. The Proposed Development complies with Safety at Sea Policy 4.
Sport and Recreation Policy 1	Proposals that promote sustainable development of water-based sports and marine recreation, while enhancing community health, wellbeing and quality of life, should be supported, provided that due consideration is given to environmental carrying capacities and tourism pressures.	The Proposed Development is an offshore wind farm and not a project for promotion of the development of water-based sports and marine recreation. As such, Sport and Recreation Policy 1 is not of relevance to the Proposed Development.
Sport and Recreation Policy 2	Proposals should demonstrate the following in relation to potential impact on recreation and tourism: The extent to which the proposal is likely to adversely impact sports clubs and other recreational users, including the extent to which proposals may interfere with facilities or other physical infrastructure. The extent to which any proposal interferes with access to and along the shore, to the water, use of the resource for recreation or tourism purposes and existing navigational routes or navigational safety. The extent to which the proposal is likely to adversely impact on the natural environment.	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). Of relevance to Sports and Recreation Policy 2, factored-in measures include: Application of a Vessel Management Plan (VMP) (Volume III, Appendix 25.7), Circulation of information via Notice to Mariners (NtM), Use of ‘rolling’/temporary 500 m advisory safe passing distances surrounding the location of all proposed/fixed structures where work is being undertaken by a construction or maintenance vessel; Use of ‘rolling’/temporary 500 m advisory clearance distances around installation/maintenance vessels; Use of 50 m advisory safe passing distances around all surface structures up until the point of commissioning. Impacts on recreational vessels, navigational safety, recreational users and tourism are assessed in Volume II, Chapter 15: Shipping & Navigation (Revised March 2026), Chapter 19: Infrastructure and Other Users (Revised March 2026), and Chapter 21: Population and Human Health (Revised March 2026). The Proposed Development will not have adverse impacts on recreation and tourism. The Proposed Development complies with Sports and Recreation Policy 2.
Sport and Recreation Policy 3	Opportunities to promote inclusive development of water-based sports and marine recreation should be supported, where appropriate and at the applicable scale, with a focus on facilities for people with disabilities	The Proposed Development is an offshore wind farm and not a project for promotion of the development of water-based sports and marine recreation. As such, Sport and Recreation Policy 3 is not of relevance to the Proposed Development
Sport and Recreation Policy 4	Proposals that improve access to marine and coastal resources for tourism activities, and sport and recreation should be supported, where appropriate, at the applicable scale and aligned with existing development plans	The Proposed Development is an offshore wind farm and not a to increase access to marine and coastal resources for sport and recreation. As such, Sport and Recreation Policy 4 is not of relevance to the Proposed Development

Policy Point	Description	Applicability to the Proposed Development and Compliance
Sport and Recreation Policy 5	Proposals should seek to enhance water safety through provision of appropriate International Organization for Standardization (ISO) and European Committee for Standardization (CEN) compliant safety signage. In general the safety of persons should be a key consideration for planners and due consideration should be given to best practice guidance for marine and coastal recreation areas endorsed by the Visitor Safety in the Countryside Group.	Lighting and marking as directed by CIL and in compliance with the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162 (IALA, 2021) and charting have been committed to by the Developer as factored-in measures. A Lighting and Marking Plan (LMP) has been submitted for the Proposed Development (Volume III, Appendix 25.6 (Revised March 2026)). The Proposed Development will also utilise the: Use of 'rolling'/temporary 500 m advisory safe passing distances surrounding the location of all proposed/fixed structures where work is being undertaken by a construction or maintenance vessel; Use of 'rolling'/temporary 500 m advisory clearance distances around installation/maintenance vessels; Use of 50 m advisory safe passing distances around all surface structures up until the point of commissioning; Information will be circulated via Notice to Mariners (NtM). Further information of health and safety protocols can be found in Volume II, Chapter 4: Description of Development (Revised March 2026) and Volume III, Appendix 25.10: Environmental Management Plan (Revised March 2026). The Proposed Development complies with Sports and Recreation Policy 5.
Telecommunications Policy 1	Proposals that guarantee existing and future international telecommunications connectivity which is critically important to support the future needs of society, Government, the provision of Public Services and enterprise in Ireland, should be supported	The Proposed Development is an offshore wind farm. The Proposed Development is not designed to guarantee existing and future telecommunications connectivity. As such, Telecommunications Policy 1 is not of relevance to the Proposed Development.
Telecommunications Policy 2	Preference should be given to proposals where evidence is provided of an integrated approach to development and activity, such as the bundling of cables (electricity and communications) where suitable, as well as pipelines for multiple activities, to minimise impacts on the marine environment, infrastructures and other users. Compatibility should be achieved, in order of preference, through: avoiding, or minimising, or mitigating adverse impacts, or If it is not possible to mitigate significant adverse impacts, proposals should set out the reasons for proceeding.	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). The existing ABWP1 export cable is the only existing submarine cable in close proximity to the Proposed Development. There is limited potential for an integrated approach with the existing submarine cable for ABWP1 due to the fact that it has a different landfall location to ABWP2. Impacts on the existing ABWP1 export cable have been assessed in Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026). Of relevance to Telecommunications Policy 3, the following factored in measure applies: Coordination of cable crossing installations and ongoing consultation with Arklow Energy Limited. The EIAR concludes that there will be no significant adverse impact on the existing ABWP1 export cable. The Proposed Development complies with Telecommunications Policy 2.
Telecommunications Policy 3	Preference should be given to proposals that protect submarine cables whilst achieving successful seabed user coexistence, such as the bundling of cables (electricity and communications) as well as pipelines for multiple activities where suitable. Proposals should specify if separate access to cables for the purposes of repair and maintenance is required. With regard to	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026).

Policy Point	Description	Applicability to the Proposed Development and Compliance
	decommissioning redundant submarine cables, a risk-based approach should be applied with consideration given to cables being left in situ where this would minimise significant impacts on the physical, natural, societal, historic, and economic value of the area	Impacts on the existing ABWP1 export cable have been assessed in Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026). The existing ABWP1 export cable is the only existing submarine cable in close proximity to the Proposed Development. Of relevance to Telecommunications Policy 3, the following factored in measure applies: Coordination of cable crossing installations and ongoing consultation with Arklow Energy Limited. The EIAR concludes that there will be no significant adverse impact on the existing ABWP1 export cable. The Proposed Development complies with Telecommunications Policy 3.
Telecommunications Policy 4	Proposals that ensure and enhance connectivity of Ireland's rural and island communities to high quality telecommunications networks should be supported.	The Proposed Development is an offshore wind farm. The Proposed Development is not designed to ensure and enhance connectivity of Ireland rural and island communities to high quality telecommunications networks. As such, Telecommunications Policy 4 is not of relevance to the Proposed Development.
Tourism Policy 1	Where appropriate, proposals enabling, promoting or facilitating sustainable tourism and recreation activities, particularly where this creates diversification or additional utilisation of related facilities beyond typical usage patterns, should be supported	The Proposed Development is an offshore wind farm. The Proposed Development is not designed to enable, promote or facilitating sustainable tourism and recreation activities networks. As such, Tourism Policy 1 is not of relevance to the Proposed Development.
Tourism Policy 2	Proposals must identify possible impacts on tourism. Where a potential significant impact upon tourism is identified it should be demonstrated how the potential negative consequences to tourism in communities will be minimised. This must include assessment of how the benefits of proposals are not outweighed by potential negative impacts	An EIAR has been submitted for the Proposed Development. A number of designed-in measures and management measures (or controls) have been factored into the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development. The full suite of measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). Impacts on tourism have been assessed in Volume II, Chapter 21: Population and Human Health (Revised March 2026). The following factored-in measures of relevance to tourism have been applied: Appointment of a Community Engagement Manager during the pre-construction and construction phase. The EIAR concludes that there will be no significant adverse impact on tourism. The Proposed Development complies with Tourism Policy 3.
Tourism Policy 3	Proposals for tourism development should seek to optimise facilities and use of space by taking a cross-sectoral development approach that provides for multiple activities, whilst minimising the extent to which the proposal is likely to adversely impact on the natural environment.	The Proposed Development is an offshore wind farm. The Proposed Development is not designed to optimise space for tourism. As such, Tourism Policy 3 is not of relevance to the Proposed Development.
Wastewater treatment and disposal Policy 1	Proposals by Irish Water related to the treatment and disposal of wastewater that: service the social and economic development of the country under the National Planning Framework; resolve environmental issues at priority areas identified by the EPA;	The Proposed Development is not an application by Irish Water. As such, Wastewater treatment and disposal Policy 1 is not of relevance to the Proposed Development.

Policy Point	Description	Applicability to the Proposed Development and Compliance
	contribute to the realisation of the objectives of: Ireland's River Basin Management Plan 2018 – 2021 The Water Services Policy Statement 2018 – 2025 Marine Strategy Framework Directive 2012 - 2020 should be supported, provided they fully meet the environmental safeguards contained within relevant authorisation processes.	
Wastewater treatment and disposal Policy 2	Proposals that have the potential to significantly adversely affect existing and planned wastewater management and treatment infrastructure where a consent or authorisation or lease has been granted or formally applied for by Irish Water should not be authorised unless: compatibility with the existing, authorised, proposed or otherwise identified in consultations with Irish Water activity, can be satisfactorily demonstrated; the proposal is clearly of strategic or national importance. Where possible, proposals that may affect Irish Water activities or plans should engage with Irish Water at the earliest available opportunity. Compatibility should be achieved, in order of preference, through: avoiding adverse impacts on those activities; and / or minimising impacts where they cannot be avoided; and / or mitigating impacts where they cannot be minimised.	Wastewater Treatment and Disposal Policy 2 is not relevant to the Proposed Development. The Proposed Development has no impact on wastewater management or treatment.

Annex 2 – Marine Strategy Framework Directive Assessment (RFI March 2026)

Version	Date	Status	Author	Reviewed by	Approved by
1.0	01/03/2026	Final External (RFI March 2026)	GoBe Consultants	GoBe Consultants	Sure Partners Limited

Statement of Authority

Experts	Qualifications	Relevant Experience
Ophelie Humphrey-Walsh .	M.Sci. Marine Biology, University of Southampton	Ophelie is a Principal Marine Mammal Consultant and technical co-lead of the marine mammal team at APEM. Ophelie joined APEM in 2024 having gained over 8 years of experience across Natural England and marine consultancy, bringing with her a wealth of experience of marine mammal technical reporting to support consents of marine industries in the UK. Since joining APEM Ophelie has worked on a range of projects in Ireland, providing document audit across EIA and HRA documentation.
John Bleach	BSc (Hons), MSc	John is an experienced marine ecologist and consultant who has a strong background providing scientific advice on the impacts of major industrial and construction developments in the marine environment. He has managed Ecological Impact Assessments and has delivered a significant number of technical Chapters and coordinated a team of environmental consultants on a number of projects for industries including aggregates, port and harbour development and energy provision. He has also provided technical and marine policy advice to government departments and agencies such as Cefas, Natural England and the JNCC. His experience includes the project management of post-consent compliance assistance for many offshore wind farms, key involvement in the ecological impact assessments associated with 20 EIAs for marine aggregates licence renewals, the provision of expert advice to developers on mitigating construction impacts on Annex I habitats, leading the post-construction monitoring of benthic resources at offshore wind farms. He also have extensive ecological survey experience and specialist skills in survey design,

Experts	Qualifications	Relevant Experience
		multivariate statistical analysis of and interpretation of marine ecological data, habitat mapping, report writing, GIS, and EIA.

Contents

Tables

Figures

Acronyms

Acronym	Meaning
ACP	An Coimisiún Pleanála
BHT	Broad Habitat Type
ABWP2	Arklow Bank Wind Park 2
DHLGH	Department of Housing, Local Government and Heritage
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
GES	Good Environmental Status
HF	High Frequency
HWM	High Water Mark
LOBE	Level of Onset of Biologically adverse Effects
MAC	Maritime Area Consent
MRU	Marine Reporting Unit
MSFD	Marine Strategy Framework Directive
NIS	Non-indigenous Species
NMFS	National Marine Fisheries Service
NMPF	National Marine Planning Framework
OSP	Offshore Substation Platform
OWF	Offshore Windfarm
RFI	Request for Further Information
UPBT	Ubiquitous Persistent Bioaccumulative and Toxic
UXO	Unexploded Ordnance
WFD	Water Framework Directive
WTG	Wind Turbine Generator

Units

Unit	Description
dB	Decibel
kHz	Kilohertz
km	Kilometre
km^2	Kilometre squared
m	Metre
m^2	Metre squared

1 Introduction

1.1 Introduction to the Assessment

1.1.1.1 Arklow Bank Wind Park 2 (ABWP2) Offshore Infrastructure (the Proposed Development) is a proposed offshore windfarm situated on and around Arklow Bank in the Irish Sea, approximately 6 to 15 km to the east of Arklow in County Wicklow. As described in Volume II, Chapter 1: Introduction (Revised March 2026), the Proposed Development holds a Maritime Area Consent (MAC) which covers both the Array Area and Cable Corridor and Working Area. The Array Area and Cable Corridor and Working Area are shown in Figure 1. The Proposed Development forms part of the wider ABWP2 Project, which comprises both the offshore infrastructure and the separate onshore grid and operational and maintenance facilities.

1.1.1.2 As part of the Request for Further Information (RFI) in relation to MSFD (RFI 3), An Coimisiún Pleanála (ACP) requested that the Applicant:

"3(a) Model, map and present the areal and temporal extent of the potential impact of the proposed development (accounting where appropriate for each Project Design Option), for the full construction and operation campaign, on the following indicators:

i) the potential spatial extent of habitat lost (D6C4)
ii) the potential spatial extent of habitat adversely effected (D6C5)
iii) the modelled impulsive noise (D11C1) with and without abatement, and
iv) the modelled continuous noise (D11C2).

3(b) Assess the results obtained for potential habitat loss and habitat adversely affected, to be assessed against the 2% thresholds established for habitat loss (D6C4) and the 25% threshold for adverse effects on habitats (D6C5) for the MSFD Celtic Seas North Inner Marine Reporting Unit.

3(c) Assess the results obtained from modelled impulsive (with and without abatement) and continuous noise in a) to be assessed against the relevant thresholds values for impulsive and continuous noise set out in the above referenced Commission Notice.

3(d) Incorporate the output from a), b) and c) and all other relevant updates made as a result of this request for further information, into a revised assessment of the NMPF policies, particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Fisheries Policy 5 and Underwater Noise Policy 1. This revised assessment should fully account for the distinction the NMPF places on 'important' species and habitats as defined on page 35 and 36 of the NMPF."

1.1.1.3 Consequently, this assessment is provided in response to the above RFIs with the purpose of determining whether the proposed construction, operation and decommissioning of the proposed development is compliant with the objectives of the Marine Strategy Framework Directive (MSFD) (Directive 2008/56/EC of the European Parliament, as amended by Directive 2017/845). This is to ensure the Proposed Development does not prevent Ireland's marine environment to maintain or achieve Good Environmental Status (GES) and to protect the resource base for economic and social activities in the marine environment. The assessment requested through RFI 3(b), and the supporting modelling and mapping as per 3(a), can be found in the following sections:

3(a)(i) The potential spatial extent of habitat lost (D6C4) including assessment against the 2% thresholds established for habitat loss – Section 3.1.5;

3(a)(ii) The potential spatial extent of habitat adversely effected (D6C5) including assessment against 25% threshold for adverse effects on habitats – Section 3.1.6.

1.1.1.4 The assessment requested through RFI 3(c), and the supporting modelling and mapping as pe 3(a), can be found in the following sections:

3(a)(iii) The modelled impulsive noise (D11C1) with and without abatement – Section 3.2.2; and

3(a)(iv) The modelled continuous noise (D11C2) – Section 3.2.3.

1.1.1.5 As per RFI 3(d), the outputs from a, b and c above have been incorporated into the revised NMPF consistency table (Volume II, Chapter 2: Policy and Legislation Annex A (Revised March 2026)).

1.2 General Description of the Site

1.2.1.1 Ireland's Marine Atlas (Marine Institute, 2022) indicates that the Array Area is characterised primarily by sands and coarse sediments. Similarly, the Cable Corridor and Working Area also encompasses areas of sands and coarse material in addition to areas of muddy sand. Overall, the area surrounding the Proposed Development can be considered as a region of mobile sediments, characterised by mobile sandwaves and the presence of sandbanks, such as Arklow Bank. There is an active sediment transport system around Arklow Bank which is predominately under the control of tidal currents (Creane *et al.*, 2023).

1.2.1.2 Ireland's Marine Strategy Part 1 Article 8, 9 and 10 reports and Appendix III (DHLGH, 2024a; 2024b) provides an assessment of impulsive and continuous noise in Irish waters, thereby indicating the level of noise in the area within which the Proposed Development is located. The area around the Proposed Development was not exposed to impulsive noise above the threshold levels between the years of 2015 to 2020 (DHLGH, 2024a). The main source of continuous noise in the Irish marine environment is from vessels. An analysis of vessel noise showed that the sound pressure levels were greater in the Irish Sea relative to other areas of the Irish Maritime Area, leading to localised areas about the threshold levels, including areas near to the Proposed Development.

1.3 Project Description

1.3.1.1 The Array Area covers an area of approximately 63.4 km^2 (a rectangular block approximately 27 km long and 2.5 km wide). The Cable Corridor and Working Area extend from the Array Area to a landfall approximately 4.5 km to the north of Arklow at Johnstown North (Figure 1). The Cable Corridor and Working Area is the area where the export, inter array and interconnector cabling will be installed. This area will also facilitate vessel operations associated with installation of Wind Turbine Generators (WTGs), cables and foundation structures within the Array Area. The offshore infrastructure will consist of the following:

- Array Area: The Array Area is the area where the WTGs, the Offshore Substation Platforms (OSPs), and associated foundations and cables will be installed. These cables will comprise export, inter array and interconnector cabling; and
- Cable Corridor and Working Area: The Cable Corridor and Working Area is the area where the export, inter array and interconnector cabling will be installed. This area will also facilitate vessel operations associated with installation of WTGs, cables and foundation structures within the Array Area.

1.3.1.2 These elements are described in further detail in Volume II, Chapter 4: Description of Development (Revised March 2026).

1.3.1.3 The Developer is seeking consent for two discrete Project Design Options. This assessment will consider both Project Design Option 1 and Project Design Option 2, which consist of:

- 53 (Option 1) or 47 (Option 2) WTGs on monopiles foundations with each WTG comprising a tower section, nacelle and three rotor blades;
- Two OSPs on monopile foundations (Options 1 and 2);
- 110 – 122 km inter-array cabling (Options 1 and 2);
- Two 35 – 40 km export cables (Options 1 and 2);
- 25 – 28 km interconnector cable (Options 1 and 2);

- Dredge disposal in the Array Area (5 locations, Options 1 and 2); and
- Dredge disposal in the Cable Corridor and Working Area (1 location (exit pit), Options 1 and 2).

1.3.1.4 Whilst a range of lengths are provided in the bullets above for cables, the MSFD assessment presented within this report uses the precautionary largest distance for each cable. The only elements of the wider ABWP2 Project which have the potential to have an effect on the MSFD objectives are those identified above, being the Proposed Development.As such the assessment presented within the report is for the Proposed Development.

1.3.1.5 Seabed preparation activities will be required in advance of installation activities, and in advance of jack-up vessel placement, to reposition any boulders/debris and to clear seabed features from the seabed. This will include boulder clearance, seabed lowering/feature clearance, followed by a pre-lay grapnel run. Monopiles will be installed into the seabed by either piling or drilling techniques, or a combination of both (drive-drill-drive), depending on seabed conditions. The following techniques are proposed for cable burial: jet trenching, cable plough, pre-lay plough, vertical injector and controlled flow excavation. As the export cables approach the landfall area and transits onshore trenchless techniques will be employed.

1.3.1.6 Further details of the Proposed Development are provided in Volume II, Chapter 4: Description of Development (Revised March 2026).

1.4 Policy and Legislative Context

1.4.1.1 Directive 2008/56/EC of the European Parliament and of the European Council of 17 June 2008 (European Parliament and Council of the European Union, 2008) (Marine Strategy Framework Directive - “MSFD”) as amended by Commission Directive (EU) 2017/845 of 17 May 2017 (European Parliament and Council of the European Union, 2017) requires all EU member states, including Ireland, to reach GES in the marine environment by 2020.

1.4.1.2 The MSFD was transposed into Irish law by S.I. 249 of 2011 - European Communities (Marine Strategy Framework) Regulations 2011, as amended by S.I. No. 265/2017 - European Communities (Marine Strategy Framework) (Amendment) Regulations 2017, S.I. No. 390/2025 - Marine Environment (Transfer of Departmental Administration and Ministerial Functions) Order 2025 and S.I. No. 648/2018 - European Communities (Marine Strategy Framework) (Amendment) Regulations 2018 (hereafter referred to as the Marine Strategy Framework Directive (MSFD) Regulations). The purpose of the MSFD Regulations is to help develop ocean economy whilst protecting and preserving the marine environment. GES in the marine environment means that the seas are clean, healthy and productive, and that human use of the marine environment is kept at a sustainable level. The Department of Housing, Local Government and Heritage (DHLGH) is the lead body for the implementation of the MSFD within Ireland.

1.4.1.3 The MSFD Directive is implemented in six-year cycles, with reporting to the European Commission taking place sequentially every two years. The MSFD Directive is currently in its third cycle, with a draft Article 8 GES assessment of Ireland’s marine environment presented in Ireland’s Draft Marine Strategy Part 1 (DHLGH, 2024a). This document also contains a revised set of environmental targets for each of the 11 qualitative descriptors of the MSFD and a socio-economic assessment on uses and activities and costs of degradation to the marine environment.

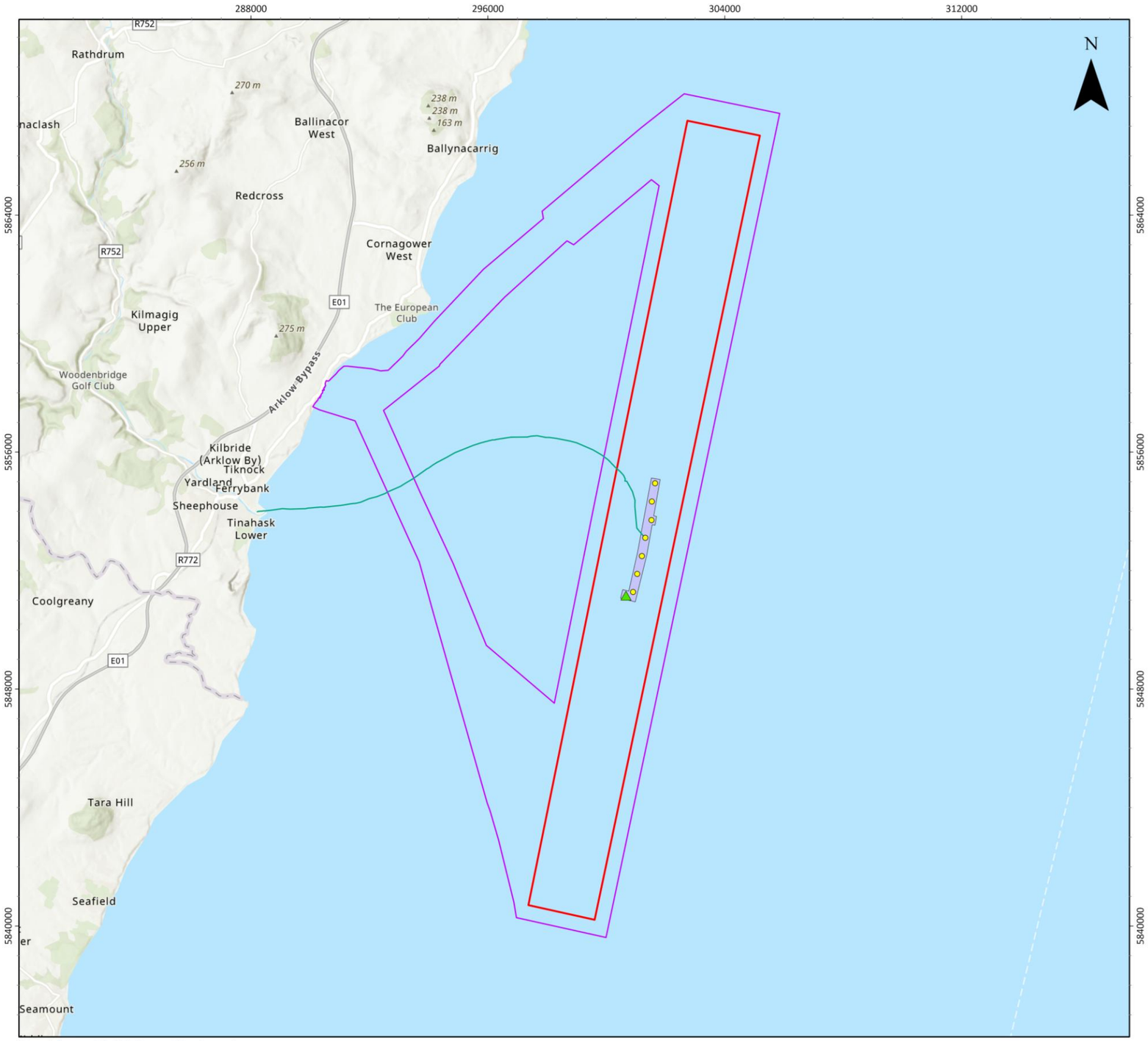


Figure Reference: Ark_Fig1_ProposedDevelopment

sse Renewables

Arklow Bank Wind Park 2

Location and Boundaries of the Proposed Development

Legend

- ABWP2 Array Area
- ABWP2 Cable Corridor and Working Area
- ABWP1 Array Area
- ABWP1 Existing Export Cable
- ABWP1 WTGs
- ABWP1 Existing Met Mast

Notes

OceanWise, Esri, GEBCO, Garmin, NaturalVue, Esri, CGIAR, USGS, Esri UK, Esri, TomTom, Garmin, FAO, NOAA, USGS, Esri UK, Esri, TomTom, Garmin, GeoTechnologies, Inc, METI/ NASA, USGS. Contains Ordnance Survey data © Crown copyright and database rights (2022). OS OpenData.

Coordinate System:
ETRS 1989 UTM Zone 30N

0 3 5 km

0 1 2 nm

Scale	Date	Drawn By	Checked By	Approved By
1:125,000 @ A3	13/10/2025	GB	CN	CMc

Suites B2 & C2
Higher Mill
Higher Mill Lane
Buckfastleigh
Devon
TQ11 0EN
www.gobeconsultants.com
+44 (0)1626 323890

GoBe APEM Group

Figure Number 1

Figure 1 Location and boundaries of the Proposed Development

2 MSFD Assessment Methodology

2.1.1.1 At the time of writing, no specific guidance has been published regarding how projects should assess compliance with the MSFD. However, this assessment has been informed by the assessment provided within the Ireland's Marine Strategy Part 1 Article 8, 9 and 10 report and Appendices (DHLGH, 2024a, 2024b).

2.1.1.2 Annex I of the MSFD Directive outlines 11 qualitative descriptors for determining GES under Article 9 of the MSFD Directive by which GES is measured and monitored. The descriptors are divided into those that characterise the condition of the marine environment and descriptors referring to anthropogenic pressures, as shown in Table 1. Article 8 of the MSFD Directive requires an assessment of the status of the marine environment in relation to all 11 descriptors (Article 8.1(a)) and an analysis of the pressures and the effects they have on the state of the marine environment (Article 8.1(b)). The descriptors and current status for Irish waters are given in Table 1.

2.1.1.3 The need for the MSFD assessment and the MSFD assessment itself are described in the following sections.

2.1.2 Need for MSFD Assessment

2.1.2.1 ACP provided an RFI (RFI 3a – d) as follows, requesting that the Applicant:

- a) Model, map and present the areal and temporal extent of the potential impact of the proposed development (accounting where appropriate for each Design Option), for the full construction and operation campaign, on the following indicators:
  - the potential spatial extent of habitat lost (D6C4),
  - the potential spatial extent of habitat adversely effected (D6C5),
  - the modelled impulsive noise (D11C1) with and without abatement, and
  - the modelled continuous noise (D11C2)
- b) Assess the results obtained for potential habitat loss and habitat adversely affected in a) above, to be assessed against the 2% thresholds established for habitat loss (D6C4) and the 25% threshold for adverse effects on habitats (D6C5) for the MSFD Celtic Seas North Inner Marine Reporting Unit, see Ireland's Draft Marine Strategy Part 1 Article 8, 9 and 10 report 2024 including its annexes, published in July 2024.
- c) Assess the results obtained from modelled impulsive (with and without abatement) and continuous noise in a) to be assessed against the relevant thresholds values for impulsive and continuous noise set out in the above referenced Commission Notice.
- d) Incorporate the output from a), b) and c) and all other relevant updates made as a result of this request for further information, into a revised assessment of the National Marine Planning Framework (NMPF) policies, particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Fisheries Policy 5 and Underwater Noise Policy 1. This revised assessment should fully account for the distinction the NMPF places on 'important' species and habitats as defined on page 35 and 36 of the NMPF.

2.1.3 MSFD Assessment

2.1.3.1 This report provides a detailed assessment for each qualitative descriptor that is considered likely to be affected by the Proposed Development (as identified in section 1.1.1.2), and identification of any areas of non-compliance and consideration of mitigation measures. The assessment considers what (if any) pressures the Proposed Development may create on the marine environment, identifies the receptors likely to be affected and determines whether there is potential for deterioration in the status of the descriptor as a result of the Proposed Development. The risk to achieving and or maintaining GES is assessed considering existing environmental

targets associated with each descriptor feature and the current status of the descriptor feature in Irish waters.

2.1.3.2 This MSFD assessment draws information from the EIAR (SSE Renewables, 2025) submitted as part of the application. Signposts to the relevant aspects of the EIAR are provided.

2.1.3.3 The RFI requirements of a) to c) are addressed and presented within the MSFD assessment section below (Section 3) as part of this report. To address the RFI requirement d), the outcome of this MSFD assessment is incorporated within the update to the assessment of NMPF policies, which is provided in Annex A of Volume II, Chapter 2 Policy and Legislation (Revised March 2026).

Table 1 Qualitative descriptors and descriptor features for determining GES and current GES status of Irish waters (DHLGH, 2024a, 2024b)

No	Descriptor (Overall current GES status)	Descriptor Criteria (Current GES Status)	Overall Target
D1	**Biodiversity** (Ireland has achieved GES for some elements of biological diversity, but the status for many species groups is unknown. Numerous species, in particular a significant proportion of fish species, are not in GES.)	D1C1 Mortality Rate Incidental by Catch (GES Not Achieved)	Biological diversity is maintained. The quality and occurrence of habitats and the distribution and abundance of species are in line with prevailing physiographic, geographic and climatic conditions. The mortality rate per species from incidental bycatch should be below levels which threaten the species, such that its long-term viability is ensured.
		D1C2 Population Abundance (GES Partially Achieved)	
		D1C3 Population Demographic Characteristics (GES Not Assessed)	
		D1C4 Species Distributional Range Extent (GES Partially Achieved)	
		D1C5 Species Habitat Extent (GES Partially Achieved)	
		D1C6 Pelagic Habitat Condition (GES Not Assessed)	
D2	**Non-indigenous species (NIS)** (GES has been achieved, based on data from 2015-2020.)	D2C1 Newly Introduced Species (GES Achieved)	Non-indigenous species introduced by human activities are at levels that do not adversely alter the ecosystems.
D3	**Commercial fish and shellfish** (GES has been partially achieved for commercially exploited fish and shellfish in Ireland's marine environment.)	D3C1 Maximum Sustainable Yield (GES Partially Achieved)	Populations of all commercially exploited fish and shellfish are within safe biological limits, exhibiting a population age and size distribution that is indicative of a healthy stock.
		D3C2 Spawning Stock Biomass (GES Partially Achieved)	
		D3C3 Age/Size Distribution (GES Unknown)	
D4	Food webs (Environmental Status for food webs remains unclear.)	D4C1 Trophic guild species diversity (GES Unknown)	All elements of the marine food webs, to the extent that they are known, occur at normal abundance and diversity and levels capable of ensuring the long-term abundance of the species and the retention of their full reproductive capacity.
		D4C2 Abundance across trophic guilds (GES Unknown)	
		D4C3 Trophic guild size distribution (GES unknown)	

No	Descriptor (Overall current GES status)	Descriptor Criteria (Current GES Status)	Overall Target
		D4C4 Trophic guild productivity (GES unknown)	
D5	**Eutrophication** (GES has been achieved for eutrophication within Ireland's marine environment.)	D5C1 Nutrient - Nitrogen (GES Achieved)	Human-induced eutrophication is minimised, especially adverse effects thereof, such as losses in biodiversity, ecosystem degradation, harmful algae blooms and oxygen deficiency in bottom waters.
		D5C1 Nutrients - Phosphorous (GES Achieved)	
		D5C2 Chlorophyll-a (GES Achieved)	
		D5C5 Dissolved Oxygen (GES Achieved)	
D6	**Sea-floor integrity** (GES for sea-floor integrity has been achieved in 74% if Ireland's assessment area, however, 15% remains either not assessed or unknown, while 11% is not in good status.)	D6C1 Benthic Habitat Physical Loss (GES Partially Achieved)	Sea-floor integrity is at a level that ensures that the structure and functions of the ecosystems are safeguarded and benthic ecosystems, in particular, are not adversely affected.
		D6C2 Benthic Habitat Disturbance (GES Partially Achieved)	
		D6C3 Adverse Effects from Physical Disturbance (GES Partially Achieved)	
		D6C4 Benthic Habitat Extent of Habitat Loss (GES Partially Achieved)	
		D6C5 Benthic Habitat Condition (GES Partially Achieved)	
D7	**Hydrographical conditions** (GES has been achieved for hydrographical conditions in Ireland's marine environment.)	D7C1 Permanent Alteration of Hydrological Conditions (GES Achieved)	Permanent alteration of hydrographical conditions does not adversely affect marine ecosystems.
		D7C2 Adverse Effects from Permanent Alteration of Hydrological Conditions (GES Achieved)	
D8	**Contaminants** (GES has been largely achieved for concentrations of contaminants in seawater, sediments and biota in Irish	D8C1 Contaminants Non- Ubiquitous, Persistent, Bioaccumulative, and Toxic (UPBT) Substances and UPBT Substances (GES Achieved)	Concentrations of contaminants are at levels not giving rise to pollution effects.

No	Descriptor (Overall current GES status)	Descriptor Criteria (Current GES Status)	Overall Target
	coastal and marine waters and with few exceptions concentrations are at levels that ensure the protection of the marine environment.)	D8C2 Adverse Effects of Contaminants (GES Achieved)	
		D8C3 Significant Acute Pollution (GES Achieved)	
D9	**Contaminants in seafood** (Contaminants in fish and other seafood for human consumption do not exceed levels established by Union legislation or other relevant standards.)	D9C1 Contaminants in Seafood (GES Achieved)	Contaminants in fish and other seafood for human consumption do not exceed levels established by Community legislation or other relevant standards.
D10	**Marine Litter** (GES has not been achieved for beach litter in Ireland's marine environment. The status of macro litter on the seafloor remains unknown, while micro and macro litter floating and micro litter on the seafloor remain unassessed.)	D10C1 Beach Litter (GES Achieved)	Properties and quantities of marine litter do not cause harm to the coastal and marine environment.
		D10C1 Seabed Litter (GES Achieved)	
		D10C2 Micro-Litter (GES Unknown)	
D11	**Energy, including underwater noise** (GES has been achieved for continuous and impulsive noise in Ireland's marine environment.)	D11C1 Impulsive Noise (GES Achieved)	Introduction of energy, including underwater noise, is at levels that do not adversely affect the marine environment.
		D11C2 Continuous Noise (GES Achieved)	

(green = GES achieved; orange = GES partially achieved; red = GES not achieved; grey = GES unknown; white = GES not assessed)

3 MSFD Assessment

3.1 D6 Sea-floor Integrity

3.1.1.1 The Proposed Development is entirely located within the Celtic Sea North Inner Marine Reporting Unit (MRU). As the Sea-floor Integrity indicators within the MSFD are reported at an MRU level, Sections 3.1.2 - 3.1.6 provide an assessment of the Proposed Development on seabed integrity within the Celtic Sea North Inner MRU.

3.1.1.2 The MSFD indicator assessment examples provided in DHLGH (2024a, 2024b) include the contribution of a number of activities, including fishing (benthic trawling), dredging and disposal and cabling. Apart from the fishing (benthic trawling) most other activities are relevant, or similar to those associated with the Proposed Development. The assessments provided below use magnitude calculations presented in EIAR Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026) Table 9.7 which includes figures for estimated area of disturbance for a number of activities. The areas associated with sediment disposal will be included within the assessment of physical disturbance (D6C2). However, as the total area or location of sediment redistribution (as a result of the employed cable burial process) is not within Table 9.7, a conservative multiplication of 1.5 is included here for all disturbance area calculations to include the contribution of sediment redistribution.

3.1.2 D6C1 Physical Loss of the Seabed Indicator[1]

Spatial extent and distribution of physical loss (permanent change) of the natural seabed

3.1.2.1 The Celtic Sea North Inner MRU extends to 69,000 km^2, of which, as indicated by DHLGH (2024a, 2024b), 261.5 km^2 is already considered as lost, which represents 0.38% of the total area of the MRU.

3.1.2.2 The area of seabed encompassed by the Array Area and Cable Corridor and Working Area extends to 140 km^2. The area of seabed lost due to placement of WTG and OSP foundations and scour protection and inter array and export cable protection is detailed in Table 2. This indicates that for Project Design Option 1 the area of seabed lost will be 0.648 km^2, while for Project Design Option 2 the figure will be 0.619 km^2 both of which figures represent approximately 0.001% of the whole seabed within the MRU.

3.1.2.3 Consequently, the Proposed Development represents a relatively small addition to the area of seabed lost and will not impact on the GES of the MRU in relation to overall physical loss of the seabed. The total area of seabed loss will increase from 0.38% to 0.381%.

[1] Physical loss can be defined as a permanent change to the seafloor from sealing of natural substrate, loss of biogenic substrate, or a change in habitat from one EUNIS Level habitat (e.g. sand to mud) when a recovery rate exceeds 12 years.

Table 2 Area of seabed lost under footprint of OWF infrastructure (WTG or OSP Foundation) or where cable or scour protection is deployed

Infrastructure	Project Design Option 1		Project Design Option 2	
	Area (m^2)	Area (km^2)	Area (m^2)	Area (km^2)
WTGs (including scour protection)	258,379	0.258	229,128	0.229
OSPs (including scour protection)	15,396	0.015	15,396	0.015
Inter Array Cable protection	146,400	0.146	146,400	0.146
Export Cable and Cable crossing protection	88,000	0.088	88,000	0.088
Interconnector Cable protection	140,000	0.140	140,000	0.140
Total	**648,175**	**0.648**	**618,924**	**0.619**

3.1.3 D6C2 Physical Disturbance of the Seabed Indicator[2]

Spatial extent and distribution of physical disturbance pressures on the seabed

3.1.3.1 Approximately 28,000 km^2 of the Celtic Sea North Inner MRU is experiencing some degree of disturbance (DHLGH, 2024a, 2024), which represent 0.38% of the seabed across the MRU.

3.1.3.2 The area of seabed disturbed due to activities such as seabed preparation for foundations, inter array and export cabling is detailed in Table 2. The total area of seafloor that will be disturbed (including 1.5 multiplier as noted in para 3.1.1.2) by Project Design Option 1 of the Proposed Development is 23.431 km^2, while for Project Design Option 2 the figure is 23.388 km^2; both figures represent 0.033% of the whole seabed within the MRU. While the areas of seabed disturbed during site preparation, installation, dredge disposal and operational and maintenance phases may spatially overlap, there will be periods of time between each operation during which recovery of benthic habitats is likely to occur. As such, each operation is considered as a separate disturbance event despite potential spatial overlap. The area of disturbance due to dredge disposal, has been calculated as the total area of the dredge disposal site (as dredge disposals will aim to dispose of material evenly across a particular site) and includes the 1.5 multiplier, to account for the majority of the deposition that may occur outside of the disposal area boundary.

[2] Physical disturbance is described for the purposes of this assessment as a change to the seafloor from which recovery can occur, if the activity causing the disturbance pressure ceases.yeas

Table 3 Area of seabed disturbed by the Proposed Development

Infrastructure	Project Design Option 1		Project Design Option 2	
	Area of Disturbance (km^2)	Total Area including 1.5 multiplier (km^2)	Area of Disturbance (km^2)	Total Area including 1.5 multiplier (km^2)
Site preparation	4.219	6.329	4.219	6.329
Installation	3.115	4.672	3.086	4.629
Dredge disposal	4.549	6.823	4.549	6.823
Operation and maintenance	3.738	5.607	3.738	5.607
Total	**12.506**	**23.431**	**15.592**	**23.388**

3.1.3.3 Consequently, the Proposed Development represents a relatively small addition to the area of seabed disturbed and will not impact on the GES of the MRU in relation to overall disturbance of the seabed. As a conservative calculation, the area of disturbance associated with the Proposed Development could be added onto the current 'Disturbed' area, giving a total of 28,017 km^2 or 40.60% of the MRU. Currently, the area of seabed in the vicinity of the Proposed Development, is already almost entirely assessed as 'Disturbed' as referenced in Ireland's Marine Strategy Part 1: Assessment of the Marine Environment - Annex III (DHLGH, 2024b). As such, whilst the Proposed Development will disturb approximately 0.016% of the MRU, the majority of that area is already assessed as disturbed and would contribute towards the current 41% of the seafloor that is 'Disturbed', as such the calculation is likely to be highly conservative.

3.1.4 D6C3 Adverse Effects from Physical Disturbance of Broad Habitat Type

The spatial extent of each habitat type which is adversely affected, through change in its biotic and abiotic structure and its functions (e.g. through changes in species composition and their relative abundance, absence of particularly sensitive or fragile species or species providing a key function, size structure of species), by physical disturbance.

3.1.4.1 Ireland's Marine Atlas (Marine Institute, 2022) maps broadscale regional habitats to Benthic Broad Habitat Type (BHT) which indicates that the dominant habitats across the Proposed Development and surrounding area are:

- circalittoral mud;
- offshore circalittoral sand;
- circalittoral sand;
- infralittoral sand;
- offshore circalittoral coarse sediment; and
- circalittoral coarse sediment.

The distribution of BHT in the vicinity of the Proposed Development, the location of the WTGs and OSPs, location of the proposed disposal areas and the indicative locations of the cable routes are indicated in

3.1.4.2 and Figure 3, for Project Design Options 1 and 2 respectively.

3.1.4.3 The degree of disturbance, or how adversely affected areas are, is derived using the OSPAR BH3 Indicator (OSPAR, 2023). Results from the BH3 indicator produce disturbance maps with different intensities of disturbance (from 1 to 10) based on the combination of the pressure (duration and frequency) and the sensitivity of the underlying habitat. However, there is no commonly agreed threshold or boundary between when a habitat is disturbed, but continues to function normally, and when the disturbance is so great that the habitat in question becomes adversely affected as a result of changes in its biotic or abiotic structure. In the absence of such a quality threshold it is conservatively estimated for MSFD purposes that a disturbance level of >7 from the BH3 indicator indicates that a habitat is highly disturbed and therefore adversely affected. GES is achieved when no more than 25% of a BHT is adversely impacted. (DHLGH, 2024b).

Table 4 Area of BHT affected by the Proposed Development

Broad Habitat Type	Area of Habitat in MRU (km^2)	Area of Habitat in Array and Cable Corridor and Working Area (km^2)	Project Design Option 1		Project Design Option 2	
			Area of Habitat Disturbed (km^2)	Proportion (%) of Broad Habitat Disturbed in MRU (cumulative proportion of disturbed habitat)	Area of Habitat Disturbed (km^2)	Proportion (%) of Broad Habitat Disturbed in MRU (cumulative proportion of disturbed habitat)
Circalittoral mud	694	1.556	0.251	0.036 (0.456)	0.250	0.036 (0.456)
Offshore circalittoral sand	8,157	24.121	2.239	0.027 (2.197)	2.233	0.027 (2.197)
Circalittoral sand	2,133	48.835	15.123	0.709 (0.759)	15.098	0.708 (0.758)
Infralittoral sand	272	0.4	0.055	0.020 (0.020)	0.055	0.020 (0.020)
Offshore circalittoral coarse sediment	14,805	21.53	1.564	0.011 (0.131)	1.561	0.011 (0.131)
Circalittoral coarse sediment	4,003	44.023	3.857	0.096 (0.146)	3.848	0.096 (0.146)

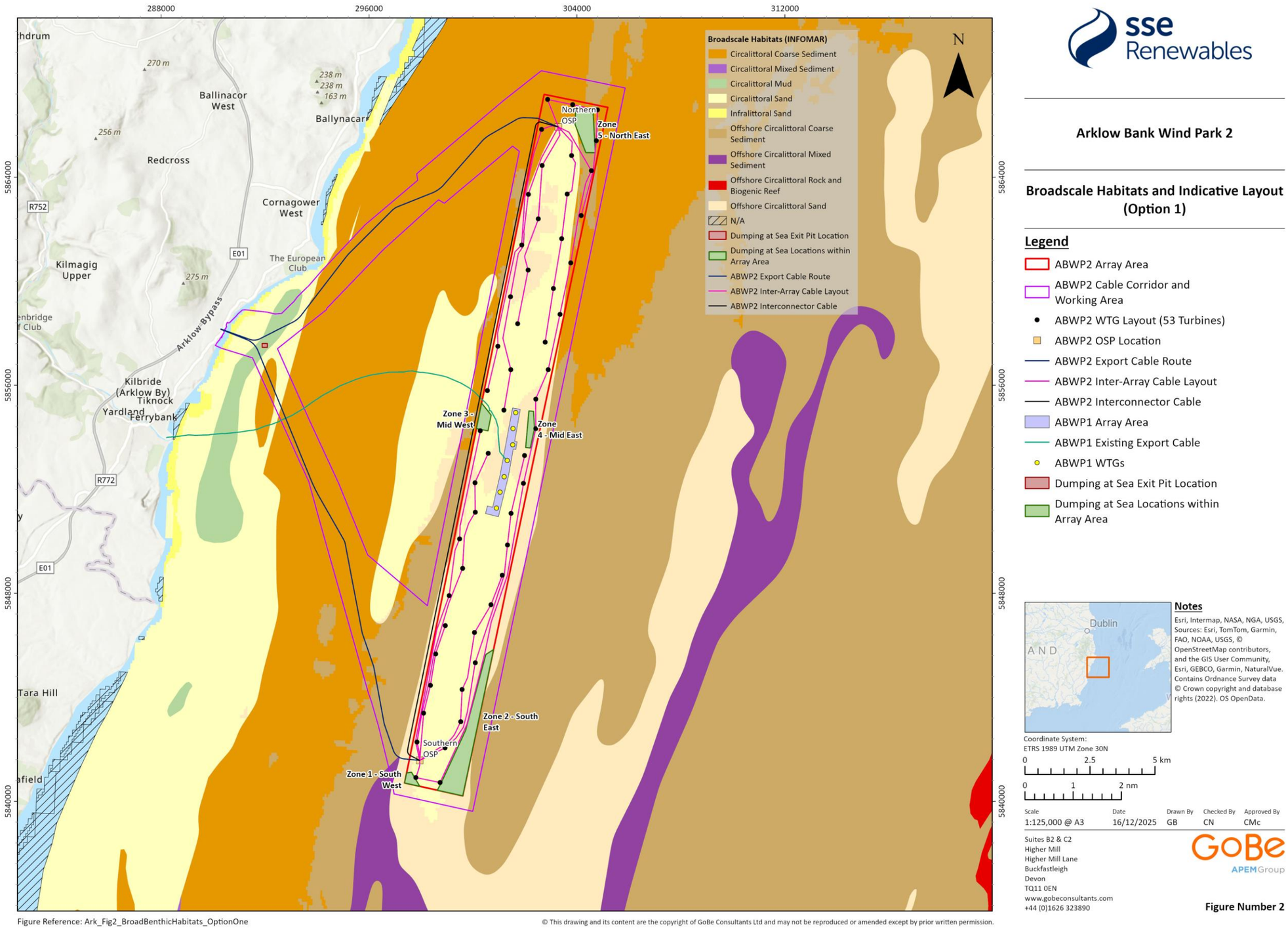


Figure Reference: Ark_Fig2_BroadBenthicHabitats_OptionOne

sse Renewables

Arklow Bank Wind Park 2

Broadscale Habitats and Indicative Layout (Option 1)

Legend

- ABWP2 Array Area
- ABWP2 Cable Corridor and Working Area
- ABWP2 WTG Layout (53 Turbines)
- ABWP2 OSP Location
- ABWP2 Export Cable Route
- ABWP2 Inter-Array Cable Layout
- ABWP2 Interconnector Cable
- ABWP1 Array Area
- ABWP1 Existing Export Cable
- ABWP1 WTGs
- Dumping at Sea Exit Pit Location
- Dumping at Sea Locations within Array Area

Notes

Esri, Intermap, NASA, NGA, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, GEBCO, Garmin, NaturalVue. Contains Ordnance Survey data © Crown copyright and database rights (2022). OS OpenData.

Coordinate System:
ETRS 1989 UTM Zone 30N

0 2.5 5 km

0 1 2 nm

Scale	Date	Drawn By	Checked By	Approved By
1:125,000 @ A3	16/12/2025	GB	CN	CMc

Suites B2 & C2
Higher Mill
Higher Mill Lane
Buckfastleigh
Devon
TQ11 0EN
www.gobeconsultants.com
+44 (0)1626 323890

GoBe APEM Group

Figure Number 2

Figure 2 Broad Benthic Habitat Types and Indicative Layout (Project Design Option 1)

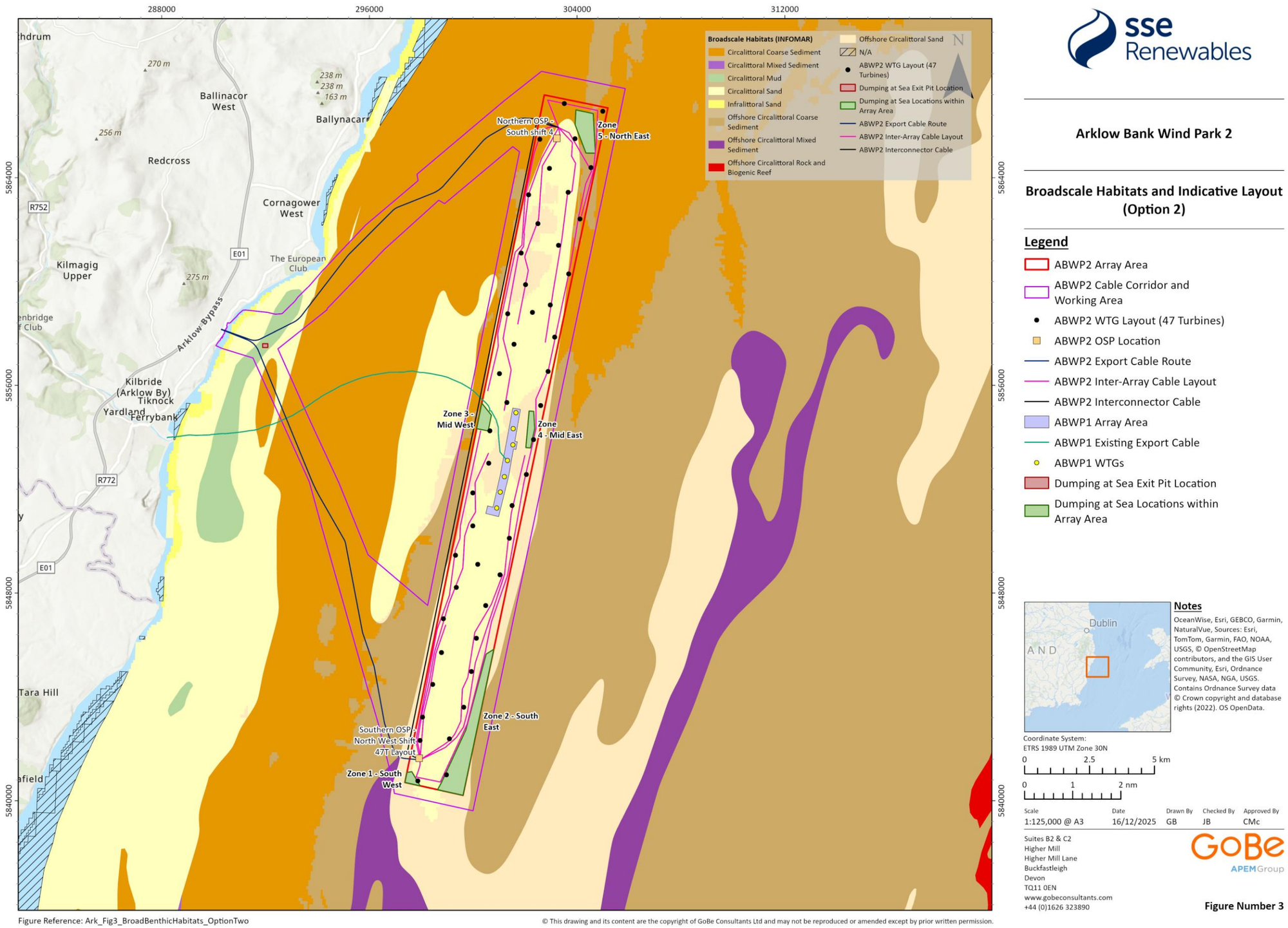


Figure Reference: Ark_Fig3_BroadBenthicHabitats_OptionTwo

sse Renewables

Arklow Bank Wind Park 2

Broadscale Habitats and Indicative Layout (Option 2)

Legend

- ABWP2 Array Area
- ABWP2 Cable Corridor and Working Area
- ABWP2 WTG Layout (47 Turbines)
- ABWP2 OSP Location
- ABWP2 Export Cable Route
- ABWP2 Inter-Array Cable Layout
- ABWP2 Interconnector Cable
- ABWP1 Array Area
- ABWP1 Existing Export Cable
- ABWP1 WTGs
- Dumping at Sea Exit Pit Location
- Dumping at Sea Locations within Array Area

Notes

OceanWise, Esri, GEBCO, Garmin, NaturalVue, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, Ordnance Survey, NASA, NGA, USGS. Contains Ordnance Survey data © Crown copyright and database rights (2022). OS OpenData.

Coordinate System:
ETRS 1989 UTM Zone 30N

0 2.5 5 km

0 1 2 nm

Scale	Date	Drawn By	Checked By	Approved By
1:125,000 @ A3	16/12/2025	GB	JB	CMc

Suites B2 & C2
Higher Mill
Higher Mill Lane
Buckfastleigh
Devon
TQ11 0EN
www.gobeconsultants.com
+44 (0)1626 323890

GoBe APEM Group

Figure Number 3

Figure 3 Broad Benthic Habitat Types and Indicative Layout (Project Design Option 2)

3.1.4.4 **Circalittoral mud** encompasses 694 km^2 of the Celtic Sea North Inner MRU, while in relation to the Proposed Development this habitat extends to 1.556 km^2 of the Array Area and Cable Corridor and Working Area. It is estimated that 0.251 km^2 of this habitat will be disturbed in relation to Project Design Option 1 Proposed Development and for Project Design Option 2 the figure is 0.250 km^2; for both Design Options, these figures represent 0.036% of the habitat within the MRU (Table 4). It is currently estimated that in the Celtic Sea North Inner MRU 0.42% of the broad habitat circalittoral mud is adversely affected by disturbance and as such, GES is currently achieved for circalittoral mud habitats in the Celtic Sea North South Inner MRU (DHLGH, 2024a, 2024b). In relation to physical disturbance GES is achieved when no more than 25% of a broad habitat type is adversely impacted, and as such, GES is currently achieved for circalittoral mud habitats in the Celtic Sea North South Inner MRU. When considering the area of this habitat likely to be disturbed by the Proposed Development within the MRU, it is clear that this level of disturbance will represent a negligible proportion of circalittoral mud habitat present in the MRU. Even as a precautionary assessment, if all of the disturbance to this habitat were to be classified as adversely affected this would mean a total of 0.456% of the offshore circalittoral mud was adversely affected, which would not alter the current status of GES.

3.1.4.5 **Offshore circalittoral sand** encompasses 8,157 km^2 of the Celtic Sea North Inner MRU, in relation to the Proposed Development this habitat extends to cover 24.121 km^2 of the Array Area and Cable Corridor and Working Area. It is estimated that 2.239 km^2 of this habitat will be disturbed in relation to Project Design Option 1 of the Proposed Development and for Project Design Option 2 the figure is 2.233 km^2; for both Project Design Options, these figures represent 0.027% of the habitat within the MRU (Table 4). It is currently estimated that in the Celtic Sea North Inner MRU 2.17% of the broad habitat offshore circalittoral sand is adversely affected by disturbance and as such, GES is currently achieved for offshore circalittoral sand habitats in the Celtic Sea North South Inner MRU (DHLGH, 2024a, 2024b). When considering the area of this habitat likely to be disturbed by the Proposed Development within the MRU, it is clear that this level of disturbance will represent a negligible proportion of offshore circalittoral sand habitat present in the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 2.197% of the offshore circalittoral sand was adversely affected, which would not alter the current status of GES.

3.1.4.6 **Circalittoral sand** encompasses 2,133 km^2 of the Celtic Sea North Inner MRU, in relation to the Proposed Development this habitat extends to 48.835 km^2 of the Array Area and Cable Corridor and Working Area. It is estimated that 15.123 km^2 of the habitat will be disturbed in relation to Project Design Option 1 of the Proposed Development and for Project Design Option 2 the figure is 15.098 km^2. For Project Design Option1 the figures represent 0.709% of the habitat within the MRU and 0.708 for Project Design Option 2 (Table 4). It is currently estimated that in the Celtic Sea North Inner MRU 0.05% of the broad habitat circalittoral sand is adversely affected by disturbance and as such, GES is currently achieved for circalittoral sand habitats in the Celtic Sea North South Inner MRU (DHLGH, 2024a, 2024b). When considering the area of this habitat likely to be disturbed by the Proposed Development within the MRU, it is clear that this level of disturbance will represent a negligible proportion of circalittoral sand habitat present in the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.759% of the circalittoral sand was adversely affected for Project Design Option 1 and 0.758% for Project Design Option 2, which would not alter the current status of GES.

3.1.4.7 **Infralittoral sand** encompasses 272 km^2 of the Celtic Sea North Inner MRU, in relation to the Proposed Development the habitat extends to 0.400 km^2 of the Array Area and Cable Corridor and Working Area. It is estimated that 0.055 km^2 of the habitat will be disturbed in relation to both Project Design Options for the Proposed Development which equates to 0.020% of the habitat within the MRU (Table 4). It is currently estimated that in the Celtic Sea North Inner MRU none of the broad habitat infralittoral sand is adversely affected by disturbance and as such, GES is

currently achieved for offshore infralittoral sand habitats in the Celtic Sea North South Inner MRU (DHLGH, 2024a, 2024b). When considering the area of this habitat likely to be disturbed by the Proposed Development within the MRU, it is clear that this level of disturbance will represent a negligible proportion of infralittoral sand habitat present in the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.020% of the infralittoral sand was adversely affected and will not alter the current status of GES.

3.1.4.8 **Offshore circalittoral coarse sediment** encompasses 14,805 km^2 of the Celtic Sea North Inner MRU, in relation to the Proposed Development the habitat extends to covers 21.530 km^2 of the Array Area and Cable Corridor and Working Area. It is estimated that 1.564 km^2 of the habitat will be disturbed in relation to Project Design Option 1 for the Proposed Development, while for Project Design Option 2 the figure is 1.561 which equates to 0.011% of the habitat within the MRU (Table 4) for both Project Design Options. It is currently estimated that in the Celtic Sea North Inner MRU 0.12% of the broad habitat offshore circalittoral coarse sediment is adversely affected by disturbance and as such, GES is currently achieved for offshore circalittoral sand habitats in the Celtic Sea North South Inner MRU (DHLGH, 2024a, 2024b). When considering the area of this habitat likely to be disturbed by the Proposed Development within the MRU, it is clear that this level of disturbance will represent a negligible proportion of offshore circalittoral sand habitat present in the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.131% of the offshore circalittoral coarse sediment was adversely affected, which would not alter the current status of GES.

3.1.4.9 **Circalittoral coarse sediment** encompasses 4,003 km^2 of the Celtic Sea North Inner MRU, in relation to the Proposed Development the habitat extends to 44.023 km^2 of the Array Area and Cable Corridor and Working Area. It is estimated that for Project Design Option 1 of the Proposed Development 3.857 km^2 of the habitat will be disturbed, while for Project Design Option 2 the figure is 3.848 km^2. For both Project Design Options, the figures represent 0.096% of the habitat within the MRU (Table 4). It is currently estimated that in the Celtic Sea North Inner MRU 0.05% of the broad habitat circalittoral coarse sediment is adversely affected by disturbance and as such, GES is currently achieved for circalittoral sand habitats in the Celtic Sea North South Inner MRU (DHLGH, 2024a, 2024b). When considering the area of this habitat likely to be disturbed by the Proposed Development within the MRU, it is clear that this level of disturbance will represent a negligible proportion of circalittoral coarse sediment habitat present in the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.146% of the circalittoral coarse sediment was adversely affected, which would not alter the current status of GES.

3.1.5 D6C4 Physical Loss of Broad Habitat Type

The extent of loss of the habitat type, resulting from anthropogenic pressures, does not exceed a specified proportion of the natural extent of the habitat type in the assessment area.

3.1.5.1 It is currently estimated that approximately 0.9% of the BHT **circalittoral mud** in the Celtic Sea North Inner MRU have been lost (DHLGH, 2024a, 2024b). In relation to physical loss GES is achieved when no more than 2% of a broad habitat type is lost, and as such, GES is currently achieved for circalittoral mud habitats in the Celtic Sea North Inner MRU. For both Project Design OOptions loss of this habitat under the footprint of the Proposed Development, such as WTG foundations and associated scour and cable protection, will be 0.006 km^2, which represents 0.0008% of the habitat across the MRU (Table 5). Consequently, this level of habitat loss will represent a negligible proportion present in the MRU, which in total would represent approximately 0.9008% of the circalittoral mud habitat (which is below the 2% target) and will not alter the current status of GES.

Table 5 Area of broad habitat types lost in relation to the Proposed Development

Broad Habitat Type	Area of Habitat in MRU (km^2)	Area of Habitat in Array and Cable Corridor and Working Area (km^2)	Project Design Option 1		Project Design Option 2	
			Area of Habitat Lost (km^2)	Proportion (%) of Broad Habitat Lost in MRU (cumulative proportion of lost habitat)	Area of Habitat Lost (km^2)	Proportion (%) of Broad Habitat Lost in MRU (cumulative proportion of lost habitat)
Circalittoral mud	694	1.556	0.006	0.0008 (0.9008)	0.006	0.0008 (0.9008)
Offshore circalittoral sand	8,157	24.121	0.094	0.0012 (1.4012)	0.085	0.0010 (1.4010)
Circalittoral sand	2,133	48.835	0.429	0.0201 (0.8201)	0.412	0.0193 (0.8193)
Infralittoral sand	272	0.400	0.002	0.0006 (1.7006)	0.002	0.0006 (1.7006)
Offshore circalittoral coarse sediment	14,805	21.530	0.022	0.0001 (0.2001)	0.022	0.0001 (0.2001)
Circalittoral coarse sediment	4,003	44.023	0.096	0.0024 (0.2024)	0.092	0.0024 (0.2024)

3.1.5.2 It is currently estimated that approximately 1.4% of the BHT **offshore circalittoral sand** in the Celtic Sea North Inner MRU have been lost (DHLGH, 2024a, 2024b). Therefore, GES is currently achieved for this habitat. For Project Design Option 1 loss under the footprint of the Proposed Development, such as WTG foundations and associated scour and cable protection, will be 0.094 km^2, which represents 0.0012% of the habitat across the MRU; for Project Design Option 2 the figures are 0.085 km^2 and 0.0010% (Table 5) Consequently, this level of habitat loss will represent a negligible proportion present in the MRU, which in total would represent 1.4012% for Project Design Option 1 and 1.4010% for Project Design Option 2 of the offshore circalittoral sand habitat (which is are both below the 2% target) and will not alter the current status of GES.

3.1.5.3 It is currently estimated that approximately 0.8% of the BHT **circalittoral sand** in the Celtic Sea North Inner MRU have been lost (DHLGH, 2024a, 2024b). Therefore, GES is currently achieved for this habitat. For Project Design Option 1 loss under the footprint of the Proposed Development, such as WTG foundations and associated scour and cable protection, will be 0.429 km^2, which represents 0.0201% of across the MRU; for Project Design Option 2 the figures are 0.412 km^2 and 0.0193% (Table 5) Consequently, this level of loss of circalittoral sand habitat will represent a negligible proportion present in the MRU, which in total would represent 0.8201% for Project

Design Option 1 and 0.8193% for Project Design Option 2 of the circalittoral sand habitat (which are both below the 2% target) and will not alter the current status of GES.

3.1.5.4 It is currently estimated that approximately 1.7% of the BHT **infralittoral sand** in the Celtic Sea North Inner MRU have been lost (DHLGH, 2024a, 2024b). Therefore, GES is currently achieved for this habitat. Loss under the footprint of the Proposed Development, such as WTG foundations and associated scour and cable protection, will be 0.002 km^2, which represents 0.0006% of the habitat across the MRU (Table 5) Consequently, this level of loss of infralittoral sand habitat will represent a negligible proportion present in the MRU, which in total would represent approximately 1.7006% of the infralittoral sand habitat for both Project Design Options (which is below the 2% target) and will not alter the current status of GES.

3.1.5.5 It is currently estimated that approximately 0.2% of the BHT **offshore circalittoral coarse sediment** in the Celtic Sea North Inner MRU have been lost (DHLGH, 2024a, 2024b). Therefore, GES is currently achieved for this habitat. Loss under the footprint of the Proposed Development, such as WTG foundations and associated scour and cable protection, will be 0.022 km^2, which represents 0.0001% of the habitat across the MRU (Table 5) Consequently this level of loss of offshore circalittoral coarse sediment habitat will represent a negligible proportion present in the MRU, which in total would represent approximately 0.2001% of the offshore circalittoral coarse sediment habitat for both Project Design Options (which is below the 2% target) and will not alter the current status of GES.

3.1.5.6 It is currently estimated that approximately 0.2% of the BHT **circalittoral coarse sediment** in the Celtic Sea North Inner MRU have been lost (DHLGH, 2024a, 2024b). Therefore, GES is currently achieved for this habitat. For Project Design Option 1 loss under the footprint of the Proposed Development, such as WTG foundations and associated scour and cable protection will be 0.096 km^2, which represents 0.0024% of the habitat across the MRU (Table 5) Consequently, this level of loss of circalittoral coarse sediment habitat will represent a negligible proportion present in the MRU, which in total would represent a maximum of 0.2024% of the circalittoral coarse sediment habitat for both Project Design Options (which is below the 2% target) and will not alter the current status of GES.

3.1.6 D6C5 Condition of Broad Habitat Type

The extent of adverse effects from anthropogenic pressures on the condition of the habitat type, including alteration to its biotic and abiotic structure and its functions (e.g. its typical species composition and their relative abundance, absence of particularly sensitive or fragile species or species providing a key function, size structure of species), does not exceed a specified proportion of the natural extent of the habitat type in the assessment area.

3.1.6.1 The overall condition of the habitat type is determined through combining a number of inputs. A hierarchy of assessment components is prescribed in the Article 8 guidance, which includes consideration of:

1. Benthic State indicators – for example Water Framework Directive (WFD) or Habitats Directive assessments;
2. Use of other Descriptor Criteria relevant to BHTs;
3. Use of the physical disturbance information: Results from the D6C2 and D6C3 assessments; and
4. Use of physical loss information: Results from the D6C4 assessment.

3.1.6.2 For the purpose of this assessment, only the contribution towards points 3 and 4 from the above list, are considered here. GES is considered to be achieved when the extent of adverse effects in any particular broad habitat type is less than 25% of the habitat extent, of which no more than 2% is habitat loss. Currently, the Celtic Sea North Inner MRU has 53% of its area in GES with 11% not in GES, (the reduced percentage of GES in is due to large area of unknown 32.5% and Not Assessed area of 3%) (DHLGH, 2024a, 2024b).

3.1.6.3 In relation to **circalittoral mud** within the Celtic Sea North Inner MRU, 0.42% of the habitat is currently assessed as being adversely affected while 0.9% is considered as lost and as such, the overall condition of this habitat is considered currently to be in GES. It is estimated that 0.006 km^2 of this habitat will be lost in relation to the Proposed Development which represents 0.0008% of the extent of this habitat across the Celtic Sea North Inner MRU, which overall would total 0.9008% of the circalittoral mud habitat (which is below the 2% target); the maximum area of disturbance is estimated as being 0.251 km^2 (Option1) representing 0.036% of the habitat across the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.456% of the circalittoral mud was adversely affected which is below the 25% target. Consequently, this addition of disturbance/loss from the Proposed Development within the circalittoral mud habitat of the Celtic Sea North Inner MRU will not alter the current GES status in relation to circalittoral mud (Table 6).

3.1.6.4 In relation to **offshore circalittoral sand** within the Celtic Sea North Inner MRU, 2.17% of the habitat is currently assessed as being adversely affected while 1.4% is considered as lost and as such, the overall condition of this habitat is considered currently to be in GES. It is estimated that a maximum 0.094 km^2 (Project Design Option 1) of this habitat will be lost in relation to the Proposed Development which represents 0.0012% of the extent of this habitat across the Celtic Sea North Inner MRU, which overall would total 1.4012% of the offshore circalittoral sand habitat (which is below the 2% target); the maximum area of disturbance is estimated as being 2.239 km^2 (Project Design Option 1) representing 0.027% of the habitat across the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 2.20% of the offshore circalittoral mud was adversely affected which is below the 25% target. Consequently, this addition of disturbance/loss from the Proposed Development within the offshore circalittoral sand habitat of the Celtic Sea North Inner MRU will not alter the current status of GES in relation to offshore circalittoral sand (Table 6).

3.1.6.5 In relation to **circalittoral sand** within the Celtic Sea North Inner MRU, 0.05% of the habitat is currently assessed as being adversely affected while 0.8% is considered as lost and as such, the overall condition of this habitat is considered currently to be in GES. It is estimated that a maximum 0.429 km^2 (Project Design Option 1)of this habitat will be lost in relation to the Proposed Development which represents 0.0201% of the extent of this habitat across the Celtic Sea North Inner MRU, which overall would total 0.0701% of the circalittoral sand habitat (which is below the 2% target); the maximum area of disturbance is estimated as being 15.123 km^2 (Project Design Option 1) representing 0.709% of the habitat across the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.759% of the circalittoral sand was adversely affected, which is below the 25% target. Consequently, this addition of disturbance/loss from the Proposed Development within the circalittoral sand habitat of the Celtic Sea North Inner MRU will not alter the current status of GES in relation to offshore circalittoral sand (Table 6).

3.1.6.6 In relation to **infralittoral sand** within the Celtic Sea North Inner MRU, none of this habitat is currently assessed as being adversely affected while 1.7% is considered as lost and as such, the overall condition of this habitat is considered currently to be in GES. It is estimated that 0.002 km^2 of this habitat will be lost in relation to the Proposed Development which represents 0.0006% of the extent of this habitat across the Celtic Sea North Inner MRU, which overall would total 1.7006% of the infralittoral sand habitat (which is below the 2% target); the area of disturbance is estimated as being 0.055 km^2 representing 0.020% of the habitat across the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.020% of the infralittoral sand was adversely affected, which is below the 25% target. Consequently, this addition of disturbance/loss from the Proposed Development within the infralittoral sand habitat of the Celtic Sea North Inner MRU will not alter the current status of GES in relation to infralittoral sand habitat (Table 6).

3.1.6.7 In relation to **offshore circalittoral coarse sediment** within the Celtic Sea North Inner MRU 0.12% of the habitat is currently assessed as being adversely affected while 0.2% is considered as lost and as such, the overall condition of this habitat is considered currently to be in GES. It is estimated that 0.022 km^2 of this habitat will be lost in relation to the Proposed Development which represents 0.0001% of the extent of this habitat across the Celtic Sea North Inner MRU, which overall would total 0.2001% of the offshore circalittoral coarse sediment habitat (which is below the 2% target); the area of disturbance is estimated as being 1.564 km^2 representing 0.011% of the habitat across the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.131% of the offshore circalittoral coarse sediment was adversely affected, which is below the 25% target. Consequently, this addition of disturbance/loss from the Proposed Development within the offshore circalittoral coarse sediment habitat of the Celtic Sea North Inner MRU will not alter the current status of GES in relation to offshore circalittoral sand (Table 6).

3.1.6.8 In relation to **circalittoral coarse sediment** within the Celtic Sea North Inner MRU 0.05% of the habitat is currently assessed as being adversely affected while 0.2% is considered as lost and as such, the overall condition of this habitat is considered currently to be in GES. It is estimated that a maximum of 0.096 km^2 (Project Design Option 1) of this habitat will be lost in relation to the Proposed Development which represents 0.0024% of the extent of this habitat across the Celtic Sea North Inner MRU, which overall would total 0.2024% of the circalittoral coarse sediment habitat (which is below the 2% target); the area of maximum disturbance is estimated as being 3.857 km^2 (Project Design Option 1) representing 0.096% of the habitat across the MRU. Even as a precautionary assessment, if all of the disturbance were to be classified as adversely affected this would mean a total of 0.146% of the circalittoral coarse sediment was adversely affected, which is below the 25% target. Consequently, this addition of disturbance/loss from the Proposed Development within the circalittoral coarse sediment habitat of the Celtic Sea North Inner MRU will not alter the current status of GES in relation to offshore circalittoral sand (Table 6).

Table 6 Condition of broad habitat types

Broad Habitat Type	Existing Proportion Lost (%)	Existing Proportion Disturbed (%)	Project Design Option 1		Project Design Option 2		
			Proportion Lost (%) / Cumulative Loss (%)	Proportion Disturbed (%) / Cumulative Disturbance (%)	Proportion Lost (%)/ Cumulative Loss (%)	Proportion Disturbed (%) / Cumulative Disturbance (%)	Current Environmental Status / Change Associated with ABWP2
Circalittoral mud	0.9	0.42	0.0008 (0.9008)	0.036 (0.456)	0.0008 (0.9008)	0.036 (0.456)	GES Achieved / None
Offshore circalittoral sand	1.4	2.17	0.0012 (1.4012)	0.027 (2.197)	0.0010 (1.4010)	0.027 (2.197)	GES Achieved / None
Circalittoral sand	0.8	0.05	0.0201 (0.8201)	0.709 (0.759)	0.0193 (0.8193)	0.708 (0.758)	GES Achieved / None
Infralittoral sand	1.7	0	0.0006 (1.7006)	0.020 (0.020)	0.0006 (1.7006)	0.020 (0.020)	GES Achieved / None
Offshore circalittoral coarse sediment	0.2	0.12	0.0001 (0.2001)	0.011 (0.131)	0.0001 (0.2001)	0.011 (0.131)	GES Achieved / None
Circalittoral coarse sediment	0.2	0.05	0.0024 (0.0024)	0.096 (0.146)	0.0024 (0.2024)	0.096 (0.146)	GES Achieved / None

3.2 D11 Noise

3.2.1.1 The Proposed Development is entirely located within the Irish Maritime Area. Under the MSFD, underwater noise is recognised as a pressure capable of adversely affecting marine mammals and other noise-sensitive receptors through multiple impact pathways. To achieve Good Environmental Status (GES), levels of impulsive and continuous underwater noise must not exceed thresholds that result in adverse effects in the marine environment.

3.2.1.2 An assessment of underwater noise associated with the Proposed Development has been undertaken in accordance with the Commission Notice on the threshold values set under the Marine Strategy Framework Directive 2008/56/EC and Commission Decision (EU) 2017/848 (European Commission (EC), 2024). Specifically, the threshold value(s) for Impulsive Noise Indicator (D11C1) and the Continuous Noise Indicator (D11C2) (EC, 2024) have been used (Table 7).

Table 7 Criterion and threshold value(s) for MSFD Noise Descriptor (D11) (EC, 2024)

Criterion	Threshold value(s)
D11C1 Impulsive noise	For short-term exposure (1 day, i.e., daily exposure), the maximum proportion of an assessment/habitat area utilised by a species of interest that is accepted to be exposed to impulsive noise levels higher than the Level of Onset of Biologically adverse Effects (LOBE), over 1 day, is 20 % or lower (≤ 20 %). For long-term exposure (1 year), the average exposure is calculated. The maximum proportion of an assessment/habitat area utilised by a species of interest that is accepted to be exposed to impulsive noise levels higher than LOBE, over 1 year on average, is 10 % or lower (≤ 10 %).
D11C2 Continuous noise	20 % of the target species habitat having noise levels above LOBE not to be exceeded in any month of the assessment year, in agreement with the conservation objective of the 80 % of the carrying capacity/habitat size

3.2.1.3 The assessment approach considers the example methodologies provided by the DHLGH (2024a; 2024b) for their assessment against the MSFD Descriptor 11 (Underwater Noise) and the primary criteria (D11C1 and D11C2). Whilst the relevant EC guidance (2024) was fully adhered to, the noise assessment methodology applied in this report (covering both impulsive and continuous sound) deviates in some respects from the approach set out in Ireland's Marine Strategy (Annex III; DHLGH, 2024b). The rationale for these deviations is provided within the corresponding sections of this assessment. Section 3.2.2 of this report presents the assessment of impulsive underwater noise, while Section 3.2.3 addresses continuous underwater noise, within the Irish Maritime Area.

3.2.2 D11C1 Impulsive Noise

3.2.2.1 The D11C1 primary criteria for Impulsive Noise, according to the Commission Decision of 2017 (as referenced in TG Noise (2022)): '*the spatial distribution, temporal extent, and levels of anthropogenic impulsive sound sources do not exceed levels that adversely affect populations of marine animals. Member States shall establish threshold values for these levels through cooperation at Union level, taking into account regional or sub-regional specificities.*'

3.2.2.2 Impulsive noise is evaluated by considering the proportion of a receptor's habitat exposed to noise levels exceeding the Level of Onset of Biologically Significant Effects (LOBE), assessed over two temporal scales. Specifically, the extent of the area exposed to impulsive noise above

the LOBE on any given day must not exceed 20% of the spatial extent of the receptor habitat, and the average daily exposure over a one-year period must not exceed 10% of the habitat (European Union, 2017; EC, 2024).

3.2.2.3 In Ireland's Marine Strategy (Annex III; DHLGH, 2024b), bottlenose dolphin is used as the representative receptor for the impulsive noise assessment, as the species is distributed throughout the Irish Maritime Area. The level of impulsive noise is evaluated across the Irish Maritime Area, which functions as the 'receptor's habitat' specified in the threshold value, and against the LOBE threshold. The same spatial extent, the Irish Maritime Area, as well as the same receptor frequency hearing group, high frequency (HF) cetaceans, will be used for the impulsive noise assessment in this report.

3.2.2.4 For the purposes of the impulsive noise assessment, a LOBE threshold of 170 dB (Decibel) HF-weighted SEL_{cum} was applied. The Competent Expert considers that 170 dB HF-weighted SEL_{cum} is the most appropriate and equivalent threshold to the value proposed in Ireland's Marine Strategy (DHLGH, 2024b) (see Paragraph 3.2.2.5) for assessing impulsive noise effects on mid-frequency cetaceans. The justification for using this value is:

- The 170 dB HF-weighted SEL_{cum} threshold provided within the referenced National Marine Fisheries Service (NMFS) (2018) guidance is specifically intended for calculating TTS from impulsive noise, including piling sources.
- This threshold considers 24-hour cumulative exposure as well as the appropriate species-specific auditory weightings.
- Utilising the 170 dB HF-weighted SEL_{cum} threshold ensures that the assessment is both scientifically robust and consistent with the position of the Ireland's Marine Strategy document.

3.2.2.5 It is noted that Ireland's MSFD assessment references a 176 dB unweighted SEL value (DHLGH, 2024b). However, the Competent Expert considers that this threshold is less appropriate as it was originally derived from studies using continuous exposure to steady-state noise, with high-frequency tonal exposures (14 Kilohertz (kHz) noise) and is not directly comparable to impulsive sources such as piling.

3.2.2.6 As specified in RFI 3(c), the assessment must "*assess the results obtained from modelled impulsive noise (with and without abatement)*." In response to this requirement, the assessment and the results presented in Table 8 include piling both with and without noise abatement scenarios (further details on the without noise abatement scenario can be found in Volume II, Chapter 11: Marine Mammals (Revised March 2026); whilst further information on the with noise abatement scenario can be found in Volume III, Appendix 11.1: Underwater Noise Assessment (Revised March 2026). While several potential sources of impulsive noise may arise during the Proposed Development, such as Unexploded Ordnance (UXO) clearances and geophysical surveys, these are not considered within the impulsive noise assessment, as discussed below.

3.2.2.7 UXO clearance events are extremely short in duration and occur infrequently. As cumulative SEL_{cum} thresholds are based on a 24-hour integration period, the contribution of isolated, very brief explosions to the overall SEL_{cum} exposure is negligible. Furthermore, any UXO clearance required for the Proposed Development is expected to use low-order techniques designed to minimise environmental impact, resulting in very small impact radii (<0.007 km^2; Volume III, Appendix 11.1: Underwater Noise Assessment (Revised March 2026)). Given the combination of low event frequency, short duration, and limited spatial extent, UXO activities are unlikely to contribute to the exceedance of the LOBE threshold which is based on HF-weighted SEL_{cum}.

3.2.2.8 Geophysical surveys have also been excluded from the impulsive noise cumulative assessment. The survey methods anticipated for the Proposed Development are short in duration, highly intermittent, and generate underwater sound levels significantly lower than both piling and UXO clearances. These sources typically fall below thresholds associated with TTS risk for HF cetaceans (Seiche, 2022). Their short operational windows, lower source levels, and limited

spatial footprint mean they are unlikely to contribute to the exceedance of the LOBE threshold which is based on HF-weighted SEL_{cum}.

3.2.2.9 For the assessment, the without noise abatement scenario reflects modelled impulsive noise levels from the unabated scenario design parameters. The with noise abatement scenario incorporates the use of a noise abatement system, representing an expected 4 dB reduction in impulsive noise levels when the abatement is deployed. Presenting both with and without noise abatement scenarios ensures that the assessment aligns fully with the RFI request and provides a transparent comparison of potential impacts under both operational conditions.

3.2.2.10 The Irish Maritime Area covers 537,471 km^2. The representative area predicted to be exposed to impulsive underwater noise above the LOBE of 170 dB weighted SEL_{cum} from a single piling location is 0.003 km^2 for both the with and without abatement scenarios. Further, the maximum number of piles impact hammered over 24 hours would be one (RFI, 2025). The resulting proportion of habitat affected by a single piling scenario is 0.0000006% of the total Irish Maritime Area, which is significantly below the recommended thresholds for short-term (20% daily) exposure to impulsive noise. If an area of this size was exposed to noise above the LOBE every day in one year, then the average area across one year would be significantly below the recommended thresholds for long-term (10% annual) exposure to impulsive noise.

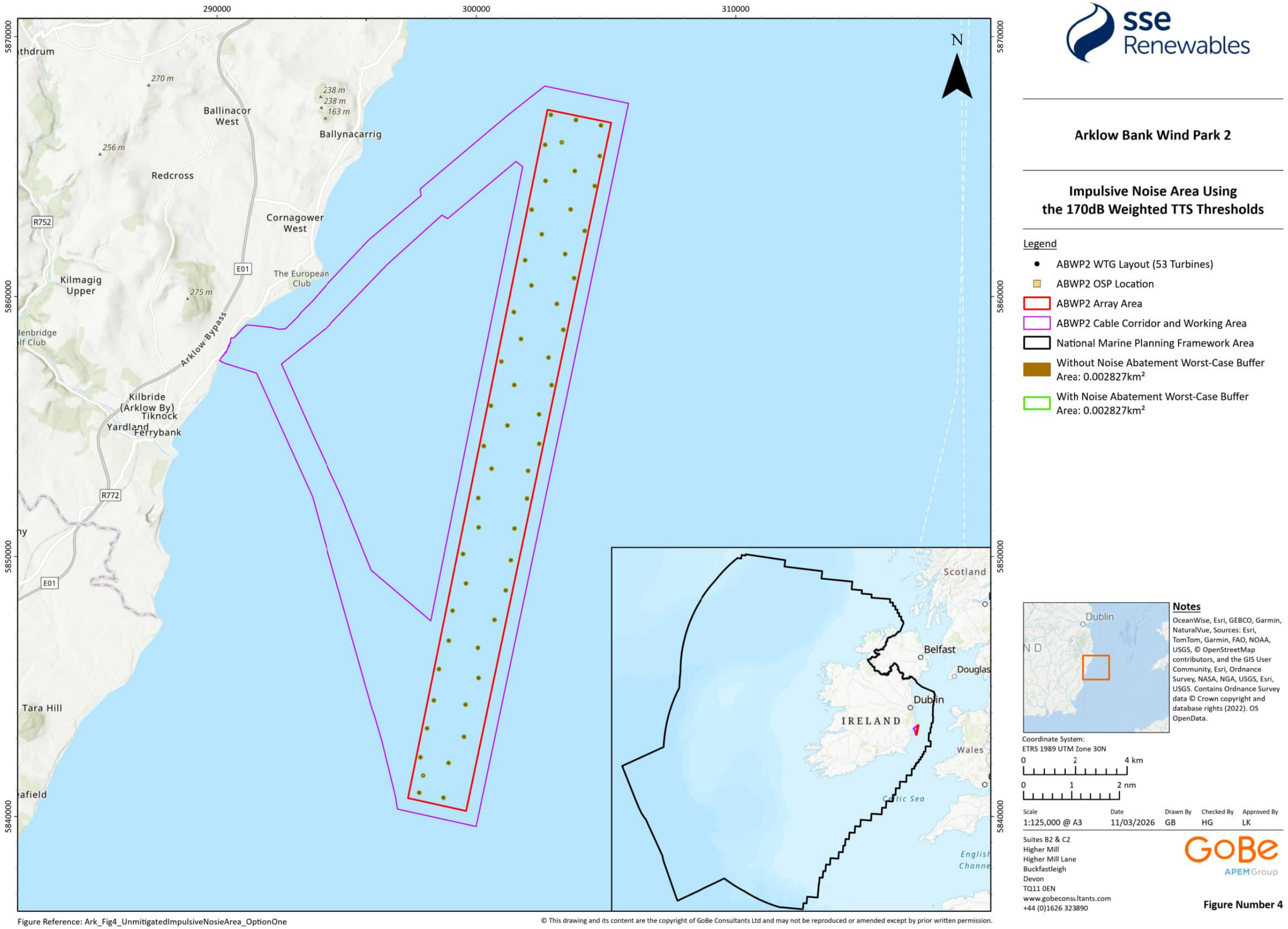
3.2.2.11 Under Project Design Option 1, the total representative area predicted to be exposed to impulsive underwater noise above the LOBE of 170 dB weighted SEL_{cum} is 0.156 km^2 for both the with and without noise abatement scenarios (Table 8). This is because modelled impact ranges for the bottlenose dolphin TTS are predicted to be less than 50 m from the piling location for both scenarios (as displayed in Figure 4). For Project Design Option 2, the representative area impacted by impulsive underwater noise is 0.139 km^2, again consistent across the with and without noise abatement scenarios (Table 8). When considered in the context of the overall Irish Maritime Area, the maximum area where impulsive noise exceeds the LOBE for Project Design Option 1 represents 0.000029% of the total Irish Maritime Area (Table 8). Regarding Project Design Option 2, the maximum area above the LOBE decreases to 0.000026%, which reflects the lower number of WTGs proposed.

3.2.2.12 Consequently, the resulting proportion of habitat affected is negligible, remaining far below the recommended thresholds for short-term (20% daily) and long-term (10% annual) exposure to impulsive noise.

Table 8 Area of impulsive underwater noise produced by the Proposed Development

Infrastructure	Maximum range to 170 dB re 1 μPa^2s threshold (km)	Area exposed to noise above 170 dB re 1 μPa^2s threshold (km^2)	Irish Maritime Area (km^2)	Percentage of Irish Maritime Area experiencing impulsive noise
Single Pile Location				
With noise abatement	0.031	0.003	537,471	0.0000006
Without noise abatement	0.031	0.003		0.0000006
Project Design Option 1				
53 WTGs without noise abatement	0.219	0.150	537,471	0.0000279

Infrastructure	Maximum range to 170 dB re 1 µPa²s threshold (km)	Area exposed to noise above 170 dB re 1 µPa²s threshold (km²)	Irish Maritime Area (km²)	Percentage of Irish Maritime Area experiencing impulsive noise
2 OSPs without noise abatement	0.044	0.006		0.0000011
Total without noise abatement	**0.223**	**0.156**		**0.0000290**
53 WTGs with noise abatement	0.219	0.150		0.0000279
2 OSPs with noise abatement	0.044	0.006		0.0000011
Total with noise abatement	**0.223**	**0.156**		**0.0000290**
Project Design Option 2				
47 WTGs without noise abatement	0.206	0.133		0.0000247
2 OSPs without noise abatement	0.044	0.006		0.0000011
Total without noise abatement	**0.211**	**0.139**	537,471	**0.0000259**
47 WTGs with noise abatement	0.206	0.133		0.0000247
2 OSPs with noise abatement	0.044	0.006		0.0000011
Total with noise abatement	**0.211**	**0.139**		**0.0000259**



sse Renewables

Arklow Bank Wind Park 2

Impulsive Noise Area Using the 170dB Weighted TTS Thresholds

Legend

- ABWP2 WTG Layout (53 Turbines)
- ABWP2 OSP Location
- ABWP2 Array Area
- ABWP2 Cable Corridor and Working Area
- National Marine Planning Framework Area
- Without Noise Abatement Worst-Case Buffer Area: 0.002827km²
- With Noise Abatement Worst-Case Buffer Area: 0.002827km²

Notes

OceanWise, Esri, GEBCO, Garmin, NaturalVue, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, Ordnance Survey, NASA, NGA, USGS, Esri, USGS. Contains Ordnance Survey data © Crown copyright and database rights (2022). OS OpenData.

Coordinate System:
ETRS 1989 UTM Zone 30N

0 2 4 km

0 1 2 nm

Scale	Date	Drawn By	Checked By	Approved By
1:125,000 @ A3	11/03/2026	GB	HG	LK

Suites B2 & C2
Higher Mill
Higher Mill Lane
Buckfastleigh
Devon
TQ11 0EN
www.gobeconsultants.com
+44 (0)1626 323890

GoBe APEMGroup

Figure Number 4

Figure Reference: Ark_Fig4_UnmitigatedImpulsiveNosieArea_OptionOne

Figure 4 Impulsive Noise Area Using the 170dB Weighted TTS Threshold for with and without noise abatement scenarios

3.2.3 D11C2 Continuous Noise

3.2.3.1 D11C2 primary criteria for Continuous Noise, according to the Commission Decision of 2017 (as referenced in TG Noise (2022)): *'The spatial distribution, temporal extent and levels of anthropogenic continuous low-frequency sound do not exceed levels that adversely affect populations of marine animals. Member States shall establish threshold values for these levels through cooperation at Union level, taking into account regional or sub-regional specificities.*'

3.2.3.2 Continuous noise is evaluated by considering the proportion of a receptor's habitat exposed to noise levels exceeding the LOBE, assessed over a single temporal scale. Specifically, exposure above LOBE must not exceed 20% of the spatial extent of the target species habitat in any month of the assessment year (European Union, 2017; EC, 2024).

3.2.3.3 In Ireland's Marine Strategy (Annex III; DHLGH, 2024b), harbour porpoise is used as the representative receptor for the continuous noise assessment, reflecting its widespread distribution across the Irish Maritime Area. Continuous noise levels are evaluated across the full Irish Maritime Area, which serves as the assessment habitat against the LOBE threshold. The same spatial extent, the Irish Maritime Area, will be used for the continuous noise assessment in this report.

3.2.3.4 This assessment of continuous noise uses the modelled threshold of 120 dB re 1 µPa (RMS) as the LOBE. This threshold is used because it is consistent with the widely-applied NOAA (2005) Level B harassment threshold of 120 dB re 1 µPa (RMS) for behavioural disturbance from continuous noise. The threshold is unweighted and so applicable to all marine mammal hearing groups. It is also noted that this threshold is used within the DHLGH continuous noise assessment framework (DHLGH, 2024b).

3.2.3.5 All continuous noise sources associated with the Proposed Development have been modelled following the methodology described in Volume III, Appendix 11.1: Underwater Noise Assessment (Revised March 2026), and the resulting predicted noise levels are summarised in Table 9. Continuous noise-generating activities include in this assessment include cable laying, dredging, rock placement, cable trenching, vessel movements, and operational WTG noise (Table 9).

3.2.3.6 As shown in Table 9, cable laying generates the greatest maximum impact range of all modelled activities. Accordingly, cable laying is used as the maximum representative scenario for continuous noise impacts during the construction phase. However, cable laying does not occur during the operational and maintenance phase. Therefore, the operational and maintenance assessment focuses on the continuous noise source for that phase which generates the maximum representative ranges, which is vessel noise (large). As vessels are not permanent noise sources, operational WTG noise is also assessed, in order to present the long-term, permanent contribution of the Proposed Development to the continuous noise levels in the Irish Maritime Area.

3.2.3.7 Applying the 120 dB re 1 µPa (RMS) threshold produced predicted continuous-noise ranges between 100 m and 8.3 km, depending on the activity, with cable laying generating the largest range (see Table 9). Accordingly, the 8.3 km range has been used as the construction-phase maximum representative scenario for comparison against the continuous noise threshold. For the operational phase, the assessment instead used an impact range of 2.9 km for vessel noise (large), and 0.12 km for operational WTG noise (250 m rotor diameter), as these represent the operational-phase maximum representative scenario for comparison against the continuous noise threshold.

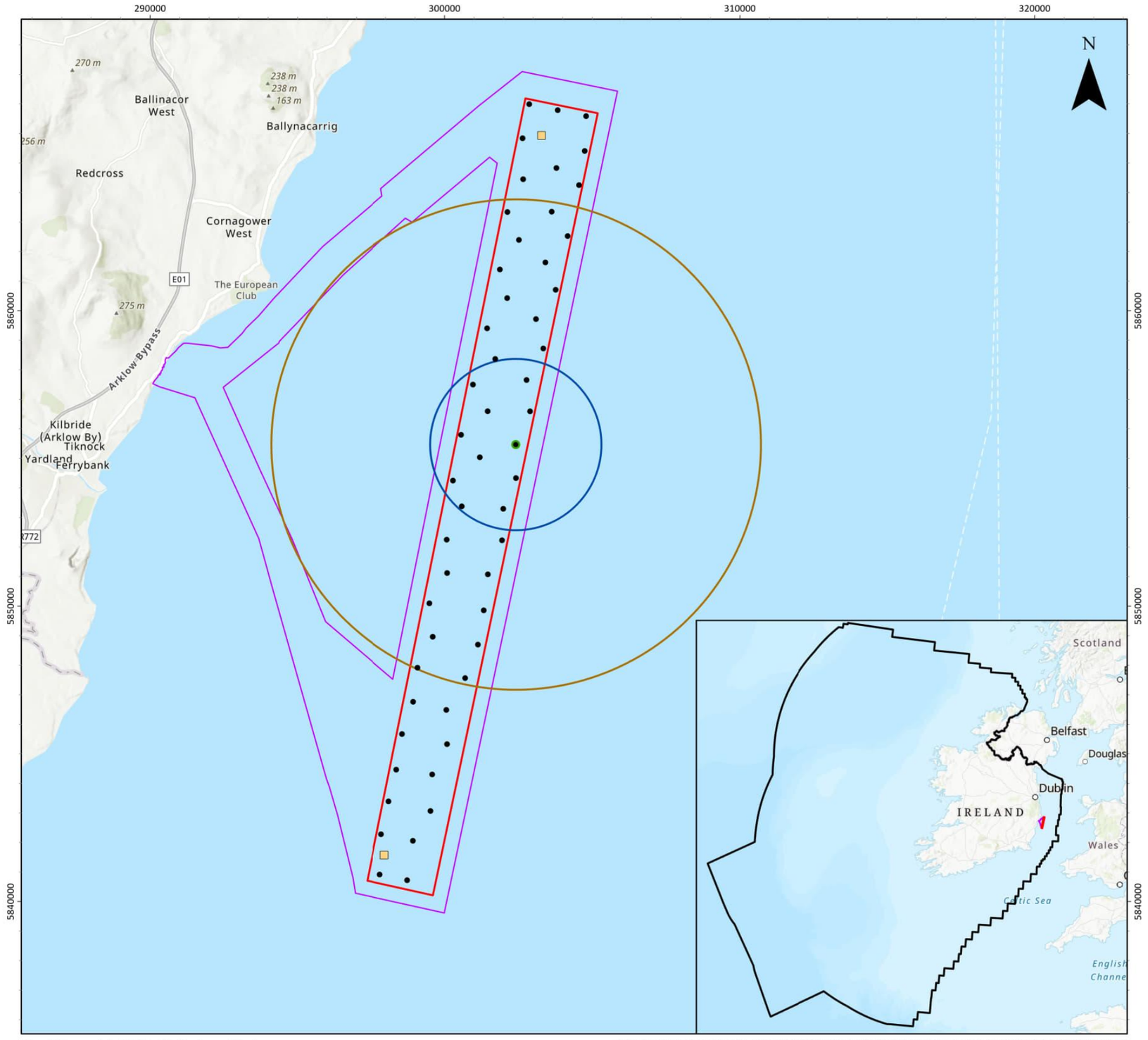
3.2.3.8 To ensure a conservative evaluation for the construction-phase assessment, the maximum representative range was mapped from a location within the Proposed Development area that led to the maximum the spatial extent across the Irish Maritime Area, by avoiding any overlap of

the area with the land. The resulting 8.3 km radius around the Proposed Development encompasses an area of 216.42 km^2, which corresponds to 0.0402672% of the Irish Maritime Area (Table 9). This comprises the maximum representative proportion of habitat exposed to continuous noise above the LOBE of 120 dB re 1 µPa (RMS) from any activity associated with the Proposed Development. Under this scenario, the affected area remains far below the recommended threshold of 20% of the Irish Maritime Area. This indicates that the predicted continuous-noise footprint is negligible in the context of total national habitat available for marine animals such as harbour porpoise.

3.2.3.9 During the operational and maintenance phase, the footprint of vessel noise (large) extends to a radius of 2.9 km, covering an area of 26.42 km^2, equivalent to 0.0049158% of the Irish Maritime Area (Table 9). For operational WTG noise, based on a 250 m rotor diameter, the maximum range over which the 120 dB re 1 µPa (RMS) threshold is exceeded is 0.12 km, corresponding to an area of 0.05 km^2 or 0.0000084% of the Irish Maritime Area (Table 9). Under this scenario, both activities result in exposing negligible areas to noise above the LOBE threshold, that are orders of magnitude below the recommended threshold of 20% of the Irish Maritime Area. This indicates that the predicted continuous-noise footprint is negligible in the context of total national habitat available for marine animals such as harbour porpoise.

Table 9 Proportion of the Irish Maritime Area with the potential to be impacted by continuous noise (120 dB re 1 µPa (RMS)), based on a maximum EDR radii from possible activities associated with the Proposed Development.

Activity	Maximum range to 120 dB re 1 µPa (RMS) threshold (km)	Area out to 120 dB re 1 µPa (RMS) threshold (km^2)	Irish Maritime Area (km^2)	Percentage of Irish Maritime Area experiencing continuous noise
Cable laying	8.3	216.42	537,471	0.0402672
Dredging (backhoe)	0.22	0.15		0.0000283
Dredging (suction)	2.3	16.62		0.0030921
Drilling (includes trenchless techniques)	1.0	3.14		0.0005845
Rock placement	5.0	78.54		0.0146128
Trenching	6.3	124.69		0.0231994
Vessel noise (large)	2.9	26.42		0.0049158
Vessel noise (medium)	1.4	6.16		0.0011456
Operational WTG noise (236m rotor diameter)	0.10	0.03		0.0000058
Operational WTG noise (250m rotor diameter)	0.12	0.05		0.0000084



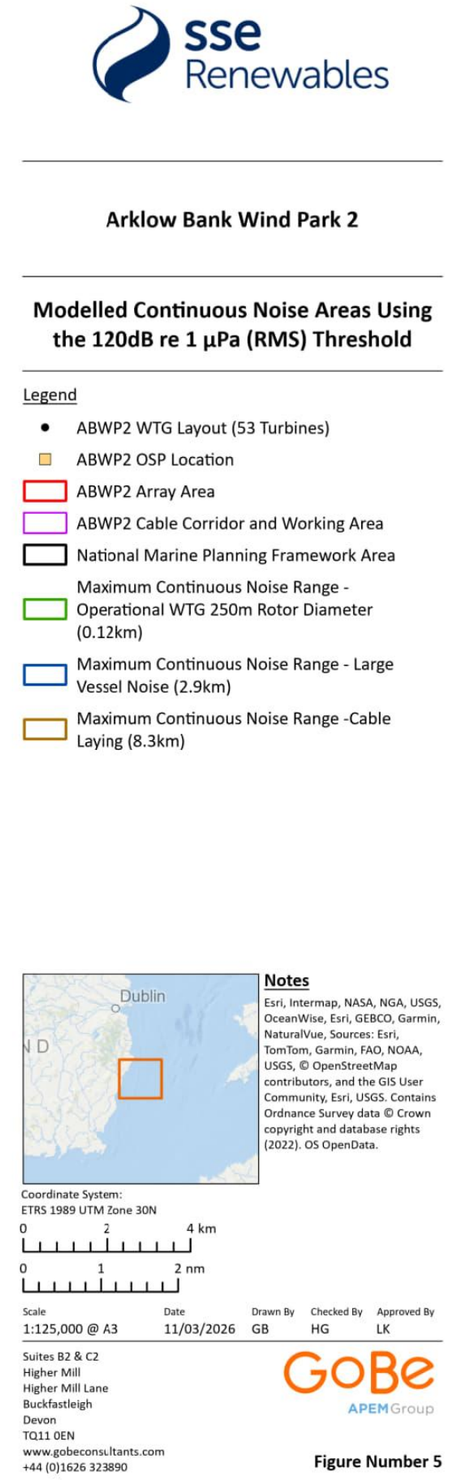


Figure Reference: Ark_Fig5_ModelledContinuousNoiseAreas

Figure 5 Modelled Continuous Noise Areas using the 120 dB re 1 µPa (RMS) Threshold

4 Conclusions

4.1.1.1 The MSFD descriptors and associated targets of relevance have been considered in this MSFD assessment. On the basis of the assessment outlined above it is considered that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner MRU or broad habitat types therein or jeopardise the attainment of Good Environmental Status. The Proposed Development will also not result in underwater noise levels (impulsive or continuous) that would adversely affect marine animal populations within the Irish Maritime Area or compromise the continued achievement of Good Environmental Status.

5 References

Creane, S., O'Shea, M., Coughlan, M. and Murphy, J. (2023) Hydrodynamic Processes Controlling Sand Bank Mobility and Long-Term Base Stability: A Case Study of Arklow Bank. Geosciences, 13(2), p.60. Available at: https://www.mdpi.com/2076-3263/13/2/60 [Accessed September 2025].

DHLGH (2024a). Ireland's Marine Strategy Part 1 Articles 8, 9 and 10 report 2024. Report by the Department of Housing, Local Government and Heritage Available at: https://assets.gov.ie/static/documents/irelands-marine-strategy-part-1-article-8-9-and-10-report-including-annex-i-ii.pdf [Accessed August 2025].

DHLGH (2024b). Ireland's Marine Strategy Part 1 Article 8, 9 and 10 report Annex III 2024. Report by the Department of Housing, Local Government and Heritage. Available at: https://assets.gov.ie/static/documents/irelands-marine-strategy-part-1-annex-iii.pdf [Accessed August 2025].

European Commission (2024). Commission Notice on the threshold values set under the Marine Strategy Framework Directive 2008/56/EC and Commission Decision (EU) 2017/848. Available at: Communication from the Commission – Commission Notice on the threshold values set under the Marine Strategy Framework Directive 2008/56/EC and Commission Decision (EU) 2017/848 [Accessed February 2026].

European Union (2008). Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive).

European Union (2017). *Descriptors under the Marine Strategy Framework Directive*. [online] environment.ec.europa.eu. Available at: https://environment.ec.europa.eu/topics/marine-environment/descriptors-under-marine-strategy-framework-directive_en. [Accessed: February 2026].

European Parliament and Council of the European Union (2017). Commission Directive (EU) 2017/845 of 17 May 2017 amending Directive 2008/56/EC of the European Parliament and of the Council as regards the indicative lists of elements to be taken into account for the preparation of marine strategies. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017L0845&from=EN [Accessed: September 2025].

Marine Institute (2022). Ireland's Marine Atlas. Available at: https://atlas.marine.ie/#?c=53.9043:-15.8862:6 [Accessed September 2025].

National Marine Fisheries Service. (2018). 2018 Revisions to: Technical Guidance for Assessing the Effects of Anthropogenic Sound on Marine Mammal Hearing (Version 2.0): Underwater Thresholds for Onset of Permanent and Temporary Threshold Shifts. U.S. Dept. of Commer., NOAA. NOAA Technical Memorandum NMFS-OPR-59, 167 p.

NMFS. (2005). Scoping Report for NMFS EIS for the National Acoustic Guidelines on Marine Mammals. Federal Register, 70 (7), pp.1871-1875.

OSPAR (2023). OSPAR CEMP Guidelines. Common Indicator: BH3 Extent of Physical Disturbance to Benthic Habitats. OSPAR Agreement 2017-09. Available at: https://www.ospar.org/documents?v=37641 [Accessed November 2025]

Seiche (2022). Arklow Geophysical and Geotechnical Surveys Subsea Noise Assessment. Report Number P1523-REPT-02-R1.

SSE Renewables (2024). Arklow Bank Wind Park 2. Environmental Impact Assessment Report Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology. Available at:

https://www.arklowbank2offshoreplanning.ie/downloads/eiar/abwp2-chapter-9-benthic-subtidal-and-intertidal-ecology.pdf [Accessed October 2025].

TG Noise (2022). Marine Strategy Framework Directive (MSFD) Common Implementation Strategy. Setting of EU Threshold Values for continuous underwater sound: Recommendations from the Technical Group on Underwater Noise (TG Noise). Available online at: https://circabc.europa.eu/ui/group/326ae5ac-0419-4167-83ca-e3c210534a69/library/bc3ed92d-4c77-4d61-b92a-b906278236a9/details [Accessed February 2026].

Annex 3 – Ecosystems Function and Services Assessment (RFI March 2026)

Version	Date	Status	Author	Reviewed by	Approved by
1.0	26/01/2026	Final External (RFI March 2026)	GoBe Consultants	GoBe Consultants	Sure Partners Limited

Statement of Authority

Experts	Qualifications	Relevant Experience
John Bleach	BSc (Hons), MSc	John is an experienced marine ecologist and consultant who has a strong background providing scientific advice on the impacts of major industrial and construction developments in the marine environment. He has managed Ecological Impact Assessments and has delivered a significant number of technical Chapters and coordinated a team of environmental consultants on a number of projects for industries including aggregates, port and harbour development and energy provision. He has also provided technical and marine policy advice to government departments and agencies such as Cefas, Natural England and the JNCC. His experience includes the project management of post-consent compliance assistance for many offshore wind farms, key involvement in the ecological impact assessments associated with 20 EIAs for marine aggregates licence renewals, the provision of expert advice to developers on mitigating construction impacts on Annex I habitats, leading the post-construction monitoring of benthic resources at offshore wind farms. He also have extensive ecological survey experience and specialist skills in survey design, multivariate statistical analysis of and interpretation of marine ecological data, habitat mapping, report writing, GIS, and EIA.

Contents

Figures

Tables

Glossary

Term	Meaning
An Coimisiún Pleanála (ACP)	Formerly An Bord Pleanála (ABP), the independent statutory body that decides on appeals from planning decisions made by local authorities in Ireland. An Coimisiún Pleanála also decides major strategic infrastructural projects under the provisions of the Planning and Development (Strategic Infrastructure) Act 2006 and have responsibility for determining planning permission for certain classes of development within the maritime area and for the generality of offshore development beyond the nearshore.
Arklow Bank Wind Park 2 – Offshore Infrastructure	"The Proposed Development", Arklow Bank Wind Park 2 Offshore Infrastructure: This includes all elements under the existing Maritime Area Consent.
Arklow Bank Wind Park 2 (ABWP2) (the Project)	Arklow Bank Wind Park 2 (ABWP2) (The Project) is the onshore and offshore infrastructure. This EIAR is being prepared for the Offshore Infrastructure. Consents for the Onshore Grid Infrastructure (Planning Reference 310090) and Operations Maintenance Facility (Planning Reference 211316) has been granted on 26th May 2022 and 20th July 2022, respectively. • Arklow Bank Wind Park 2 Offshore Infrastructure: This includes all elements to be consented in accordance with the Maritime Area Consent. This is the subject of this EIAR and will be referred to as 'the Proposed Development' in the EIAR. • Arklow Bank Wind Park 2 Onshore Grid Infrastructure: This relates to the onshore grid infrastructure for which planning permission has been granted. • Arklow Bank Wind Park 2 Operations and Maintenance Facility (OMF): This includes the onshore and nearshore infrastructure at the OMF, for which planning permission has been granted. Arklow Bank Wind Park 2 EirGrid Upgrade Works: any non-contestable grid upgrade works, consent to be sought and works to be completed by EirGrid.
Array Area	The Array Area is the area within which the Wind Turbine Generators (WTGs), the Offshore Substation Platforms (OSPs), and associated cables (export, inter- array, and interconnector cabling) and foundations will be installed.
Cable Corridor and Working Area	The Cable Corridor and Working Area is the area within which export, inter-array and interconnector cabling will be installed This area will also facilitate vessel jacking operations associated with installation of WTG structures and associated foundations within the Array Area.
Competent Authority (CA)	The authority designated as responsible for performing the duties arising from the EIA Directive as amended. For this application, the Competent Authority is An Coimisiún Pleanála (ACP).
Environmental Impact Assessment (EIA)	An Environmental Impact Assessment (EIA) is a statutory process by which certain planned Projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of

Term	Meaning
	the Council (EIA Directive) and the regulations transposing the EIA Directive (EIA Regulations).
Environmental Impact Assessment Report (EIAR)	An Environmental Impact Assessment Report (EIAR) is a report of the effects, if any, which the proposed project, if carried out, would have on the environment. It is prepared by the developer to inform the EIA process.
EirGrid	State-owned electric power transmission system operator (TSO) in Ireland and Transmission Asset Owner (TAO) for the Project's transmission assets.
Landfall	The area in which the offshore export cables make landfall and is the transitional area between the offshore cabling and the onshore cabling.
Mitigation Measure	Measure which would avoid, reduce, or offset an impact.
Permitted Maritime Usage	The construction and operation of an offshore windfarm and associated infrastructure (including decommissioning and other works required on foot of any permission for such offshore windfarm).
The Application	The full set of documents that will be was submitted to An Coimisiún Pleanála in support of the consent.
The Developer	Sure Partners Ltd.

Acronyms

Term	Meaning
AA	Appropriate Assessment
ABWP1	Arklow Bank Wind Park 1
ABWP2	Arklow Bank Wind Park 2
ACP	An Coimisiún Pleanála
AEZ	Archaeological Exclusion Zones
ALARP	As Low As Reasonably Practicable
ALM	Archaeology Management Plan
CBRA	Cable Burial Risk Assessment
CICES	Common International Classification of Ecosystem Services
COLREG	International Regulations for Preventing Collisions at Sea
DEHLG	Department of the Environment, Heritage and Local Government
FMMS	Fisheries Management and Mitigation Strategy
EC	European Commission
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EMF	Electromagnetic Field
EMP	Environmental Management Plan
EPA	Environmental Protection Agency
FLO	Fisheries Liaison Officer
GES	Good Environmental Status
HWM	High Water Mark
IAA	Irish Aviation Authority
IMO	International Maritime Organisation
INNS	Invasive Non-Native Species
IRCG	Irish Coast Guard
LCA	Landscape Character Area

Term	Meaning
LMP	Lighting and Marking Plan
MAC	Maritime Area Consent
MMMP	Marine Mammal Mitigation Plan
MPCP	Marine Pollution Contingency Plan
MSFD	Marine Strategy Framework Directive
MSO	Marine Survey Office
NMP	National Monuments Service
NMPF	National Marine Planning Framework
NtMs	Notice To Mariners
OFLO	Offshore Fisheries Liaison Officer
OGI	Onshore Grid Connection Infrastructure
O&M	Operation and Maintenance
OMF	Operations and Maintenance Facility
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
RFI	Request for Further Information
ROV	Remote Operated Vehicle
SAAO	Special Amenity Area Order
SAR	Search and Rescue
SLVIA	Seascape, Landscape, Visual Impacts Assessment
SOLAS	Safety of Life at Sea
SPL	Sure Partners Ltd
SSC	Suspended Sediment Concentration
UK	United Kingdom
UKERC	UK Energy Research Centre
UN	United Nations
UXO	Unexploded Ordinance
VMP	Vessel Management Plan
WTG	Wind Turbine Generators

Units

Unit	Description
Cd	Candela
km	Kilometres
km^2	Kilometres squared
MW	Megawatt

1 Introduction to the Assessment

1.1 Background

1.1.1.1 Under RFI 4, An Coimisiún Pleanála (ACP) noted the requirement for the Developer to update the Environmental Impact Assessment Report (EIAR) to include an assessment of impacts (both positive and negative) to relevant ecosystem functions and services and include mitigation measures, as appropriate. ACP advised that this should include those services classified as:

- Provisioning;
- Regulation and maintenance; and
- Cultural services.

1.1.1.2 Noting that the Developer is advised to consider the full range of ecosystem services set out in the report 'Valuing Ireland's Blue Ecosystem Services' (Norton *et al,* 2018), as referenced in the National Marine Planning Framework (NMPF).

1.1.1.3 This document sets out the Developer's assessment of the potential impacts of the Proposed Development on the ecosystem functions and services criteria listed within the Norton *et al***.** report. As such, it provides the synopsis report on the relevant impacts on ecosystem functions and services, as requested in the RFI. As the assessment of effect on ecosystem services and functions is drawn from the conclusions of the assessments within the EIAR, which included assessment of construction, operational and decommissioning impacts, the need for adaptive management, ongoing monitoring and/or other mitigations are considered within the respective EIAR chapters and transposed within the assessment tables of this report (Table 1.2). As the conclusions of the EIAR are already directly linked to the assessment of ecosystem functions and services and therefore it is considered that the impacts (both positive and negative) on relevant ecosystem functions and services have already been assessed in the EIAR. However, this synopsis report describes the assessment through the lens of ecosystem functions and services as referenced in the NMPF.

1.1.1.4 With regard to the two proposed Project Design Options, each chapter of the EIAR has fully assessed both Project Design Options. This report draws on the conclusions of respective chapters of the EIAR and therefore the impacts on ecosystem functions and services of both options have been fully assessed herein.

1.1.1.5 Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Addendum to the EIAR unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR will be clearly labelled as such.

1.1.1.6 Arklow Bank Wind Park 2 (ABWP2) (the Proposed Development) is a proposed offshore wind farm situated on and around Arklow Bank in the Irish Sea, approximately 6 to 15 km to the east of Arklow in County Wicklow.

1.1.1.7 ABWP2 is made up of both onshore and offshore components. The subject of this Ecosystem Functions and Services Report is the offshore infrastructure only (the Proposed Development).

1.1.1.8 In May 2022, Sure Partners Ltd. (the Developer) received planning approval for the onshore grid infrastructure (OGI) (Case Reference: 310090). In June 2022, the Developer received planning permission for the Operations and Maintenance Facility (OMF) (Planning Register Reference: 21/1316).

1.1.1.9 The Proposed Development comprises the Array Area (the area within which the Wind Turbine Generators (WTGs), the Offshore Substation Platforms (OSPs), and associated cables (export, inter-array, and interconnector cabling) and foundations will be installed) and the Cable Corridor and Working Area (the area within which export, inter-array and interconnector cabling will be

installed. This area will also facilitate vessel jacking operations associated with installation of WTG structures and associated foundations within the Array Area). The total area of the Array Area is approximately 63.4 km^2. The total footprint of the Proposed Development is 139.4 km^2 (Figure 1.1).

1.1.1.10 The proposed Cable Corridor and Working Area will extend from the Array Area to the Landfall approximately 4.5 km to the north of Arklow at Johnstown North where it will meet with the consented OGI at the High Water Mark (HWM). The HWM is where the geographical delineation between the onshore and offshore components of ABWP2 is made.

1.1.1.11 A Maritime Area Consent (MAC) (Ref:2022-MAC-002) was granted for the Proposed Development in December 2022 and the Developer has prepared a planning application for the Proposed Development which has been submitted to ACP.

1.1.1.12 An existing wind farm, Arklow Bank Wind Park 1 (ABWP1) consisting of seven turbines with a capacity of 25.2MW that was constructed on Arklow Bank in 2003/04, is owned and operated by Arklow Energy Limited. It was the first operational offshore wind farm in Ireland. ABWP1 is located within a sublease area and is surrounded by the Proposed Development, ABWP1 does not form part of the Proposed Development.

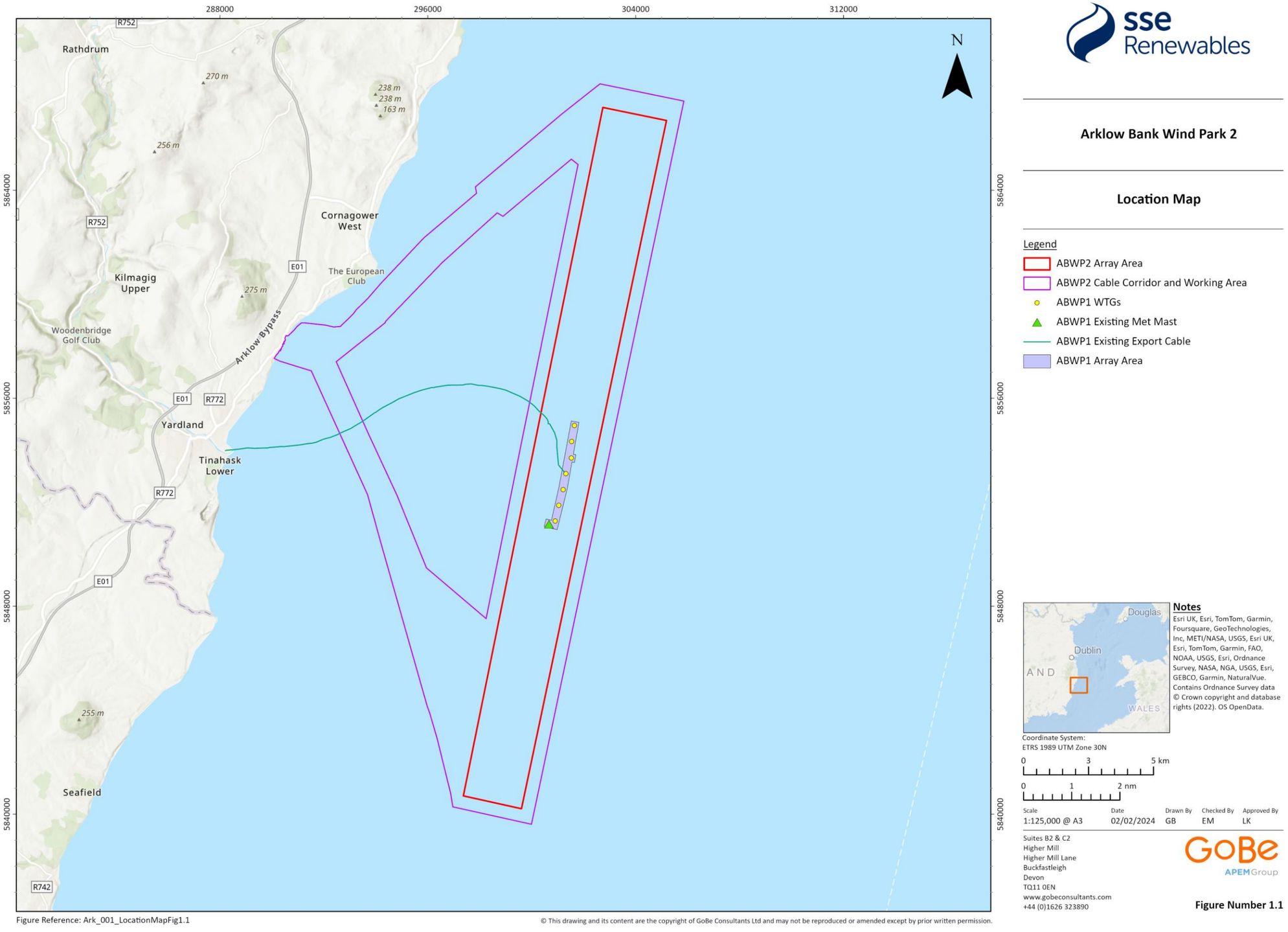


Figure 1.1 Arklow Bank Wind Park 2 (the Proposed Development)

1.2 Classification of Ecosystem Services

1.2.1.1 Ecosystems are multilayered communities of living organisms which interact with each other and their environment. An ecosystem can be defined as “a dynamic complex of plant, animal and micro-organism communities and their non-living environment interacting as a functional unit” (Convention on Biological Diversity, 1992).

1.2.1.2 The NMPF defines ecosystem services as “processes by which the environment produces resources utilised by humans, such as clean air, water, food and materials.” And goes on to note, “ecosystems are multifunctional communities of living organisms interacting with each other and their environment. Ecosystems provide a series of services for human well-being (ecosystem services) either directly (as food and fibre) or indirectly by providing clean air and water” (NMPF, 2021). The Millennium Ecosystem Assessment (MEA, 2005) aimed to provide evidence for action needed to protect ecosystems and their ecosystem services. It introduced a classification system that categorised ecosystem services into four groupings. The first three, provisioning services, regulation and maintenance services and cultural services, were all underpinned by the fourth, supporting services.

1.2.1.3 The United Nations (UN) Common International Classification of Ecosystem Services (CICES) has since been developed using MEA as a starting point and then refined to reflect some of the key issues identified in the wider research literature. It has been endorsed as a tool for classification of ecosystem services by the UN and the European Commission (EC). The classification system was last updated in 2023 (CICES, 2023).

1.2.1.4 In Ireland the same CICES approach has been used in the classification of Valuing Ireland’s Blue Ecosystem Services (Norton *et al.*, 2018).

1.3 Policy and Legislative Context

1.3.1 The National Marine Planning Framework

1.3.1.1 The NMPF (2021) sets out the framework and proposed approach to managing Ireland’s maritime activities to ensure the sustainable use of marine resources up to 2040. The plan covers Ireland’s maritime area, including internal waters (sea area), territorial seas, exclusive economic zone (EEZ) and continental shelf.

1.3.1.2 Environment policies in the NMPF have been split into nine categories largely aligned to the Marine Strategy Framework Directive (MSFD) Good Environmental Status (GES) descriptors as well as addressing air quality and climate change.

1.3.1.3 In particular, the Seafloor and Water Column Integrity Policy 3 of the NMPF also requires proposals to take account of the space required for coastal habitats, for ecosystem functioning and the provision of ecosystem services and to demonstrate that they will, in order of preference, avoid, minimise or mitigate for net loss of coastal habitats.

1.3.1.4 NMPF Climate Change Policy 1 states that proposals should demonstrate how they:

- avoid contribution to adverse changes to physical features of the coast; and
- enhance, restore or recreate habitats that provide a flood defence or carbon sequestration ecosystem services where possible.

Where potential significant adverse impacts upon habitats that provide a flood defence or carbon sequestration ecosystem services are identified, these must be in order of preference and in accordance with legal requirements:

a) avoided,
b) minimised,

c) mitigated,
d) if it is not possible to mitigate significant adverse impacts the reasons for proceeding must be set out.

1.3.1.5 Noting that the NMPF Climate Change Policy 1 (as described above) should be included as part of statutory environmental assessments where such assessments are required (NMPF, 2021). The policy goes on to note that "proposals should identify and describe habitats within the immediate vicinity and determine whether those habitats provide carbon sequestration or flood defence ecosystem services".

1.4 Ecosystem Functions and Services Methodology

1.4.1.1 At the time of writing, no specific guidance has been published regarding how projects within Irish waters should assess ecosystem functions and services. However, as advised by ACP, the assessment has been informed by the range of ecosystem services documented and associated assessment provided within 'Valuing Ireland's Blue Ecosystem Services' (Norton *et al.*, 2018). Additionally, the UK Energy Research Centre (UKERC) funded Phase 4 Research Programme and developed a 'Database of Evidence for the impact of Offshore wind farms on Marine Ecosystem Services' which has also been considered.

1.4.2 Ireland's Blue Ecosystem Services

1.4.2.1 The Socio-Economic Marine Research Unit (SEMRU) within the Whitaker Institute of NUI Galway, have a main research focus examining the economic utility of the marine environment (e.g. transportation, recreation) and the ecological value (e.g. fisheries, aquaculture) derived from the productivity of associated ecosystems. The SEMRU non-technical report 'Valuing Ireland's Blue Ecosystem Services' (Norton *et al.*, 2018) is focused on the ecosystem service benefits that society receives from Ireland's marine environment, complementing previous work on the Irish ocean economy.

1.4.2.2 The report itself aims to improve stakeholder and policymaker's understanding of Ireland's blue economy and encourage the development of sustainable economic activities that foster "blue growth". The full range of ecosystem services set out in the report has been used to define the marine ecosystem functions and services of relevance to the Proposed Development.

1.4.2.3 To note the report only uses the overarching category of 'ecosystem services', which also encompasses their functioning role. Norton *et al.*, (2018) describe that ecosystem services are provided by the processes, functions and structure of the marine environment that directly or indirectly contribute to societal welfare, health and economic activities.

1.4.3 UK Energy Research Centre Database of Evidence

1.4.3.1 An evidence database was collated by a review of global primary literature (primary and peer reviewed) and UK grey literature on the potential and experienced impacts of Offshore Wind Farm (OWF) developments as part of this UK research. Data was extracted from each evidence source, for each marine ecosystem component that was impacted by the OWF developments. Information was recorded on the phase of development, the specific pressure and any other relevant information about the OWF or its location. Expert judgement by competent experts was used to map each piece of evidence for impacts according to CICES v5.1 or MEA and other published classification systems for ecosystem services.

1.4.3.2 The information that has been collated and provided within the database can be interrogated by applying filters on the headers assigned to each column. This filters the evidence to relevant sources for each EIAR topic. Whilst not requested for by ACP and not drafted specifically for Ireland, the information within the database collates information on potential impacts from a

variety of OWFs and has been used to inform this Ecosystem Functions and Services report due to its relevance.

1.5 Ecosystem Services

1.5.1.1 The three categories of ecosystem services as noted in the ACP RFI of provisioning, regulation and maintenance and cultural are further defined by Norton *et al.* (2018) as follows, including a fourth ecosystem service noted in Norton *et al* (2018) of supporting ecosystem services:

- **Provisioning services** – These ecosystem services are tangible goods and there is often a direct connection between the ecosystem and the provision of these ecosystem services. Examples of the provisioning ecosystem services generated by Irish marine and coastal ecosystems are the fish and seaweed that are harvested and also the aquaculture production around Ireland's coasts.
- **Regulation and maintenance services** – These ecosystem services regulate the world around us and often are consumed indirectly. Examples of these ecosystem services include carbon sequestration which helps to mitigate climate change, treatment of wastewater and its return to the hydrological cycle and flood and storm protection by sand dunes and saltmarsh which lessens the damage from winter storms.
- **Cultural services** – The cultural ecosystem services refer to the psychical, psychological and spiritual benefits that humans obtain from contact with nature. Examples of the cultural ecosystem services in the Irish marine and coastal zones include recreational activities such as walking along the beach, surfing, etc. and also the added value that having a sea view from your house has on your well-being.
- **Supporting ecosystem services** uphold and enable the maintenance and delivery of the other ecosystem service categories. To avoid double counting, supporting services tend not to be included in ecosystem value assessments as only final impacts on well-being are counted as economic benefits. For example, the effects of changes in nutrient cycling in marine systems will be reflected in the final welfare impact on provisioning services such as commercial fish catches or in the cultural service of recreational fishing.

1.6 Screening of Ecosystem Functions and Services

1.6.1.1 The first stage of the assessment is to consider if there is a pathway between the Proposed Development and a potential interaction with an ecosystem service. In this way, some ecosystem services can be screened out from assessment as there is no source-pathway-receptor interaction between the Proposed Development and the ecosystem service. The screening exercise for the Proposed Development is presented in Table 1.1. Where an ecosystem service is screened in, the main part of the assessment (presented in Section 1.7) will refer to the assessment undertaken as part of and documented in the EIAR for the Proposed Development. As such, the relevant EIAR chapter and/or associated appendix is referenced in Table 1.2.

Table 1.1 Screening assessment for the Proposed Development for ecosystem services as detailed in Norton *et al.*, (2018)

Ecosystem Service	Screening assessment and Associated EIAR Charters/Assessments
Provisioning ecosystem service	
Offshore capture fisheries	IN: Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026)

Ecosystem Service	Screening assessment and Associated EIAR Charters/Assessments
Inshore capture fisheries	IN: Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026)
Aquaculture	IN: Volume II, Chapter 6: Coastal Processes (Revised March 2026) Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026)
Algae/ Seaweed harvesting	OUT: There are no known commercial algae / seaweed harvesting activities taking place on the eastern side of Ireland. As such there is no potential for commercial algae / seaweed harvesting activities to be impacted due to the Proposed Development, as all known sites are located at such a significant distance from the Proposed Development that there is no potential for impacts. As such this ecosystem service is screened out.
Genetic materials	OUT: The rich biodiversity within the marine and coastal zones provide a range of genetic material that has potential future uses, which include the exploitation of genes related to certain traits to genetically modify organisms (Norton *et al,* 2018). Whilst there are some (non-significant) impacts predicted to marine ecological receptors, this will not impact the potential future provision of genetic materials. As such this ecosystem service is screened out.
Water for non-drinking purposes	IN: Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026)
Regulating and maintenance ecosystem services	
Waste services	IN: Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026)
Coastal defence	IN: Volume II, Chapter 6: Coastal Processes (Revised March 2026)
Lifecycle and habitat services	IN: Volume II, Chapter 6: Coastal Processes (Revised March 2026) Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026) Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026) Volume II, Chapter 11: Marine Mammals (Revised March 2026) Volume II, Chapter 12: Offshore Ornithology (Revised March 2026) Volume II, Chapter 13: Offshore Bats (Revised March 2026)
Pest and disease control	IN: Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026) Volume II, Chapter 10: Fish and Shellfish and Sea Turtle Ecology (Revised March 2026)
Climate regulation	OUT: Climate regulation by marine environments was not assessed as part of the assessment for the Proposed Development. However, there are not expected to be any impacts to the intertidal habitats and so no change to their climate regulatory function. Whilst there will be a degree of disturbance to fully subtidal sediments, areas of temporary disturbance

Ecosystem Service	Screening assessment and Associated EIAR Charters/Assessments
	are expected to fully recover, and thus no indirect effect on their climate regulatory function. There is expected to be a small reduction in some areas of subtidal sediments, due to the placement of infrastructure and, where required scour and cable protection, however this is expected to result in negligible reduction in climate regulatory function. In addition, Arklow Bank is more comprised of mobile coarser sediments which is not effective in capturing carbon. The Proposed Development as a whole is considered beneficial to the functioning of wider ecosystem services by making carbon savings overall, due to the provision of green electricity. As such this ecosystem service is screened out.
Cultural services	
Recreational services	IN: Volume II, Chapter :10 Fish, Shellfish and Sea Turtle Ecology (Revised March 2026) Volume II, Chapter: 11 Marine Mammals (Revised March 2026) Volume II, Chapter: 12 Offshore Ornithology (Revised March 2026) Volume II, Chapter: 15 Shipping and Navigation (Revised March 2026) Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) Volume II, Chapter 21: Population and Human Health (Revised March 2026)
Scientific and educational services	IN: Volume II, Chapter 6: Coastal Processes (Revised March 2026) Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026) Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026) Volume II, Chapter 11: Marine Mammals (Revised March 2026) Volume II, Chapter 12: Offshore Ornithology (Revised March 2026) Volume II, Chapter 13: Offshore Bats (Revised March 2026) Volume II, Chapter 15: Shipping and Navigation (Revised March 2026) Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026)
Marine heritage, culture and entertainment	IN: Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026)
Aesthetic services	IN: Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) Volume II, Chapter 21: Population and Human Health (Revised March 2026)
Spiritual and emblematic values	IN: Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) Volume II, Chapter 21: Population and Human Health (Revised March 2026) Volume III, Appendix 21.2: Supplementary Socio-economic Analysis (RFI March 2026)

Ecosystem Service	Screening assessment and Associated EIAR Charters/Assessments
Non-use values	OUT: Whilst it is understood that non-use values (existence and bequest values e.g., satisfaction with the knowledge a resource exists by an individual not currently making use of the resource) is one of the ecosystem services which is provided by the marine environment, this aspect has not been directly assessed as part of the Proposed Development. However, by ensuring the other services and functions are considered (see above rows and the subsequent assessments where required), these non-use values are also assumed to be maintained.

1.7 Ecosystem functions and services assessment

1.7.1.1 The second stage is the ecosystem function and service assessment. Where an ecosystem service has been screened in (from Table 1.1), information is presented in Table 1.2 that makes up the assessment of the potential impact of the Proposed Development on that ecosystem service. The table includes:

- Relevance to the Proposed Development:
  - Baseline information on the ecosystem service presented from the national assessment (Norton et al., 2018);
  - Information on the potential for impacts to ecosystem services by offshore windfarms, summarised from the UKERC database;
- Mitigation measures and Impact Assessment summary:
  - Mitigation that is relevant to the EIAR Chapter that is used as the basis for the assessment. This can be in the form of factored in mitigation and best practice, and where it was identified as a requirement within the EIAR further mitigation;
  - The significance of effect predicted within the EIAR Chapter;
  - Conclusion regarding the potential for impacts to ecosystem services as a result of the Proposed Development.

1.7.1.2 In essence, the assessment as provided below, utilises the assessments conducted within the EIAR and presents them within the context of ecosystem services.

Table 1.2 Marine ecosystem functions and services assessment for the Proposed Development

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
Provisioning ecosystem service			
Offshore and Inshore Capture Fisheries (both inshore and offshore ecosystem services are considered together)			
Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026)	The estimated value for landings made by capture fisheries within the Irish EEZ (vessels >15 m) was over EU470 million in 2015 (Norton *et al*., 2018). The Proposed Development must maintain the population abundance, distribution, habitat and diversity of species caught by offshore fisheries. The UKERC database, which provides wider evidence of potential impacts, which are not related to the Proposed Development, indicates an overall general decrease in catch per unit effort and negative effect on abundance in relation to wind farm construction, whereas there are more positive benefits, including increases in catch per unit effort during the operational phase. There is also indication of a negative impact on static and towed gears of commercial fisheries along with a generally negative economic impact on commercial fisheries. In some areas of Europe and the USA, an increase in catch per unit effort was recorded for cod, pouting, sole and brown crab during wind farm operation.	Factored in mitigation measures consist of: • Appointment of a Fisheries Liaison Officer (FLO) and use of Offshore FLOs (OFLOs) as required to enable ongoing liaison with fishing fleets to be maintained. • Timely and efficient posting of Notice to Mariners (NtM) and navigational warnings. • Adherence to appropriate guidance with regards to fisheries liaison and mitigation procedures in the event of interactions between the proposed development and fishing activities, • Cable Burial Risk Assessment (CBRA) - The aim of the CBRA is to undertake a risk assessment in order to determine suitable burial depths for a cable along the entire route to protect the cable from third party and natural hazards. This includes identifying all hazards to the cable and carrying out a risk assessment to make recommendations on the burial depth required along the length of the cable to ensure that the risk to the cable is within acceptable limits. The CBRA includes an assessment of seabed conditions (based on available survey data) and an assessment of shipping, fishing, dredging, military activities etc. Burial requirements are normally driven by the risk from fishing gear and vessel anchors, as well as the seabed conditions along the cable route (which affects the anchor and fishing gear penetration depths). • Implementation of cooperation payments where the relocation of static gear is required, as appropriate, and following an evidence-based approach. • Advisory Safety Zones (500 m) will be put in place for construction and maintenance works, and for pre commissioning works (50 m). • Advisory clearance distances. Use of ‘rolling’/temporary 500 m advisory clearance distances around installation/maintenance vessels. • Development of and implementation of an Environmental Management Plan (EMP). This includes mitigation/monitoring measures and commitments made within the EIAR, including but not limited to chemical usage, invasive and non-native species, pollution prevention and waste management. • A Fisheries Management and Mitigation Strategy (FMMS) has been prepared. The FMMS sets out the means of ongoing fisheries liaison through construction and operation and maintenance (O&M) phases of the proposed development and details and commits to mitigation measures of relevance to commercial fisheries. • Gear loss - Implementation of a procedure for claim for loss or damage to fishing gear which is provided in the FMMS. • A Vessel Management Plan (VMP) - The VMP confirms the types and numbers of vessels that will be engaged on the proposed development, and considers vessel coordination including indicative transit route planning (Marine Coordination). Based on the predicted level of effects it is concluded that some additional mitigation is required beyond the primary mitigation measures. For commercial fisheries this includes: • In order to mitigate the potential effects on the whelk fishery operating across the Cable Corridor and Working Area during the	**Not significant to slight adverse effects** are predicted for commercial fisheries and aquaculture receptors as a result of the Proposed Development. As there are no significant effects anticipated on the specific commercial fisheries and aquaculture receptors (following the implementation of the factored in and additional mitigation measures), including those that may occur through inter-related factors, it can be concluded that there will be no reduction in the ability of normal ecosystem functions and services to function with regards to commercial capture fisheries. The Commercial Fisheries and Aquaculture chapter (Volume II, Chapter 14) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also includes consideration of cumulative impacts.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
		construction phase, a FMMS has been produced (Volume III, Appendix 25.3: FMMS (Revised March 2026)), which provides principles for co-existence and details further mitigation, including cooperation agreements and associated payments. With respect to any cooperation agreements and associated payments, an evidence based procedure will be followed.	
Aquaculture			
Volume II, Chapter 6: Coastal Processes (Revised March 2026)	Aquaculture is an important sector particularly in rural areas along the Irish western seaboard. Most of the aquaculture output produced relates to salmon, oyster and mussel farming and is mainly based along the western coast of Ireland (Norton *et al.* 2018). The spatial extent and distribution of any sediment plumes and associated deposition should not adversely affect aquaculture and is at a level that ensures that the structure and functions of the ecosystems are safeguarded. The UKERC database, which provides wider evidence of potential impacts, which are not related to the Proposed Development, indicate the potential for positive benefits due to the potential for colocation of OWFs and aquaculture.	Factored in mitigation measures consist of: • Scour protection will be installed as described in Volume II, Chapter 4: Description of Development (Revised March 2026). • Environmental monitoring - Commitments to environmental monitoring. O&M asset monitoring commitments include survey of seabed and assets every six months for the first two years and annually thereafter (Volume II: Chapter 4: Description of Development (Revised March 2026)). This will include monitoring to determine scour development and cable burial. • Cable burial and protection - Cables will be buried where possible and protected where not possible. Based on the predicted level of effects it is concluded that no additional mitigation is required beyond the primary mitigation measures. An aquaculture site is located off the coast of Arklow, co. Wicklow, approximately 5.3 km from the closest point of the Cable Corridor and Working Area – the Irish Mussel Seed Company mussel farm. The mussel farm is made up of semi-permanent structures marked by eight navigation buoys which are fixed to the seabed via screw in anchors. However at a distance of 5.3 km from the closest point of the proposed development, it is not anticipated that significant SSC or deposition as a result of trenchless operations or seabed preparation for export cable installation and the associated spoil activities for the proposed development will overlap with the Irish Mussel Seed Company Aquaculture site.	**Imperceptible adverse to slight adverse** effects are predicted for marine coastal processes receptors, as a result of the Proposed Development. As there are no significant effects anticipated on the specific marine geology, sediments and coastal processes receptors, including those that may occur through inter-related factors, it can be concluded that that there will be no reduction in the ability of normal ecosystem functions and services to function with regards to aquaculture services. The Commercial Fisheries and Aquaculture chapter (Volume II, Chapter 14) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Volume II, Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026)	Aquaculture is an important sector particularly in rural areas along the Irish western seaboard. Most of the aquaculture output produced relates to salmon, oyster and mussel farming and is mainly based along the western coast of Ireland (Norton *et al.* 2018).	As per previous commercial fisheries and aquaculture section under 'Provisioning ecosystem services', which concludes that with the factored in mitigation measures, such as production and adherence to an EMP and appointment of a FLO, and the inclusion of additional mitigation measures, such as cooperation agreements and associated payments, there will be **no adverse significant** effects. Specifically, the mussel seed fishery was assessed as a receptor within Chapter 14: Commercial Fisheries and Aquaculture (Revised March 2026). The assessment noted potential impacts that range from **not significant to slight adverse effect.**	**Not significant to slight adverse effects** are predicted for commercial fisheries and aquaculture receptors (alone and cumulatively) as a result of the Proposed Development. As there are no significant effects anticipated on the specific commercial fisheries and aquaculture receptors (following the implementation of the additional mitigation measures), including those that may occur through inter-related factors, it can be concluded that there will be no reduction in the ability of normal ecosystem functions and services to function with regards to aquaculture.
Water for non-drinking purposes			
Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026)	The most significant type of non-drinking use for marine water identified in Irish coastal, marine and estuarine ecosystems is the use of water for cooling in electricity generating stations in a number of estuaries around Ireland (Norton *et al.* 2018). The Proposed Development is not close to an existing or planned electricity generating station. UKERC database which provides wider evidence of potential impacts, which are not related to the	Factored in mitigation measures consist of: • Implementation of an EMP - This includes mitigation/monitoring measures and commitments made within the EIAR, including but not limited to chemical usage, invasive and non-native species, pollution prevention and waste management. • Scour protection - scour protection will be installed prior to the foundations in order to reduce the development of scour around the structures. Further detail is provided in Volume II, Chapter 4: Description of Development (Revised March 2026).	**Imperceptible adverse to slight adverse** effects are predicted for marine water and sediment quality receptors as a result of the Proposed Development. In addition, the Proposed Development will not cause or contribute to the deterioration of waterbodies status under the WFD or jeopardise the potential for water bodies to achieve 'Good' status. As there are no significant effects anticipated on the specific marine water and sediment quality receptors, including those that may occur

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	Proposed Development, including information regarding water quality, indicates predominantly no overall impact on marine water quality during all stages of an offshore wind farm. This implies no overall impact to provisioning ecosystem services.	• CBRA - The aim of the CBRA is to undertake a risk assessment in order to determine suitable burial depths for a cable along the entire route to protect the cable from third party and natural hazards. This includes identifying all hazards to the cable and carrying out a risk assessment to make recommendations on the burial depth required along the length of the cable to ensure that the risk to the cable is within acceptable limits. The CBRA includes an assessment of seabed conditions (based on available survey data) and an assessment of shipping, fishing, dredging, military activities etc. Burial requirements are normally driven by the risk from fishing gear and vessel anchors, as well as the seabed conditions along the cable route (which affects the anchor and fishing gear penetration depths). • An Invasive Non-Indigenous Species Management Plan - The plan outlines measures to ensure vessels comply with the International Maritime Organisation (IMO) ballast water management guidelines, it will consider the origin of vessels and contain standard housekeeping measures for such vessels as well as measures to be adopted in the event that a high alert species is recorded. • A Marine Pollution Contingency Plan (MPCP) - The MPCP will ensure that any potential risk of spillage or pollution is minimised. This commitment is standard practice and ensures the use of appropriate preventative measures and serves as an embedded mitigation against this type of pollution incidence. If an accidental spill occurs, all relevant parties will be informed as required in the MPCP. • Adherence to a VMP - The VMP will confirm the types and numbers of vessels that will be engaged on the Proposed Development and consider vessel coordination including indicative transit route planning (Marine Coordination). This commitment is standard practice and relates to consideration of impacts associated with non-native species, accidental pollution, habitat loss/disturbance and collision risk. • Adherence to a Rehabilitation Schedule Volume II, Chapter 4: Description of Development (Revised March 2026)) and Rehabilitation Schedule (Volume III, Appendix 4.1) - This commitment is standard practice. The Rehabilitation Schedule describes measures for the decommissioning of the Proposed Development. There will be several impacts to receptors associated with decommissioning (e.g. removal of infrastructure). No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on marine water and sediment quality. Further supporting evidence on the absence of water quality impacts is provided in Volume III, Appendix 7.1: Water Framework Directive (Revised March 2026) due to the Proposed Development, which concludes that the Proposed Development will not cause or contribute to the deterioration of waterbodies status under the WFD or jeopardise the potential for water bodies to achieve 'Good' status.	through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to water for non-drinking purposes. The Marine Water and Sediment Quality chapter (Volume II, Chapter 7) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Regulating and maintenance ecosystem services			
Waste services			
Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026)	In some cases, provided the ecosystem is not overloaded, it can process waste material through either physical or biochemical means and the output is much less harmful and indeed may be a	Factored in mitigation measures consist of: • Ongoing consultation with Arklow Energy Limited throughout the remaining lifetime of ABWP1 - To promote and maximise	**Imperceptible adverse to slight adverse** effects are predicted for infrastructure and other users as a result of the Proposed Development.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	beneficial product. Of note services provided as part of wastewater and disposal of material, such as dredge material can be impacted by projects. As such the Proposed Development should not impact other users which are involved in waste services. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, indicates an overall positive impact on waste remediation. However, to note this was only based on two examples provided. This included an increase in mussel bed function for biochemistry cycling and a reduction in microplastics.	cooperation between the Developer and Arklow Energy Limited and to minimise both spatial and temporal interactions • Use of 'rolling'/temporary 500 m advisory clearance distances around installation/maintenance vessels (Volume III, Appendix 15.1, Navigational Risk Assessment (NRA) (Revised March 2026)). • Promulgation of information advising on the nature, timing and location of activities, including through Notices to Mariners. Information and notices will also be posted near Landfall. • Appointment of a Community Engagement Manager during the pre-construction and construction phase (Volume III, Appendix 25.1: EMP (Revised March 2026)). • Adherence to a Lighting and Marking Plan (LMP) Volume III: Appendix 25.6: LMP (Revised March 2026). Navigational aids and marine charting, also to be agreed with the Commissioners of Irish Lights. • Adherence to a Vessel Management Plan (VMP) (Volume III, Appendix 25.7). • Implementation of a buoyed construction/decommissioning area around the Array Area during the appropriate phases. • Adherence to a Rehabilitation Schedule (RS) (Volume III, Appendix 4.1). No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on infrastructure and other users. To note, the potential implications of the crossing of existing wastewater pipelines by proposed infrastructure of the Proposed Development has been considered. There are no crossings of existing wastewater pipelines. To note, the assessment considered within Volume II, Chapter 19: Infrastructure and Other Users (Revised March 2026) include consideration of the other disposal sites in the vicinity of the Proposed Development, the dredge disposal for ABWP1. The assessment also considers the dredging/disposal/redistribution of sediment that may be required for the Proposed Development.	As there are no significant effects anticipated on the specific infrastructure and other users, including those that may occur through inter-related factors, it can be concluded that there will be no reduction in the ability of normal ecosystem functions and services to function with regards to waste services. The Infrastructure and Other Users chapter (Volume II, Chapter 19) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Coastal defence			
Volume II, Chapter 6: Coastal Processes (Revised March 2026)	The ecosystem service of coastal defence is the preventative or moderating effect that certain ecosystems can have on infrequent natural hazards thus reducing the level of harm imposed on life, health or property. Many ecosystems can act as physical barriers to dampen or reduce the energy hitting the terrestrial portion of the seashore. Such ecosystems include reefs, seagrasses, kelp beds/forests, dunes and saltmarshes. As such, the Proposed Development should not cause changes to coastal processes that have the potential to negatively impact on the ability of natural ecosystems to provide coastal protection services.	As per previous coastal processes section under 'Provisioning ecosystem service, which concludes that with the factored in mitigation measures, such burial of cables where possible, there will be **no adverse significant effects**. To note, there are none of the noted coastal defence ecosystems (reefs, seagrasses, kelp beds/forests dunes and saltmarshes) within the near-shore or intertidal areas in the vicinity of the Proposed Development (Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026)). As such, there is no potential for impacts to any ecosystems that have the potential of providing natural coastal defence services. This includes no potential for impacts due to any works on the shallow subtidal HDD exit pit areas.	**Imperceptible adverse to slight adverse** effects are predicted for marine coastal processes receptors (alone and cumulatively), as a result of the Proposed Development. As there are no significant effects anticipated on the specific marine geology, sediments and coastal processes receptors, including those that may occur through inter-related factors, it can be concluded that that there will be no reduction in the ability of normal ecosystem functions and services to function with regards to coastal defence services.
Lifecycle and habitat services			

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
Volume II, Chapter 6: Coastal Processes (Revised March 2026)	Marine geology, sediments and coastal processes must be maintained to ensure the seabed is habitable for marine organisms. The spatial extent and distribution of permanent alteration of hydrographical conditions to the seabed and water column, is at a level that ensures that the structure and functions of the ecosystems are safeguarded and that benthic ecosystems, in particular, are not adversely affected. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding Sediment and Geology, indicates an overall general increase in sediment loss via plumes and scour and accretion effects on the seabed. There is generally no impact on sedimentation and geology and seabed features. The result of these impacts is an overall negative to no impact on regulating and maintenance ecosystem services.	As per previous coastal processes section under 'Provisioning ecosystem service, which concludes that with the factored in mitigation measures, such burial of cables where possible, there will be no adverse significant effects.	**Imperceptible adverse to slight adverse** effects are predicted for marine geology, oceanography and physical processes receptors (alone and cumulatively), as a result of the Proposed Development. As there are no significant effects anticipated on the specific marine geology, sediments and coastal processes receptors, including those that may occur through inter-related factors, it can be concluded that that there will be no reduction in the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services.
Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026)	Marine water quality must be maintained to ensure the water column is habitable for marine organisms. The Proposed Development should not impact water and sediment quality, such that it significantly impacts the form and function of the aquatic environment, through the introduction or spread of contaminants and toxins. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding water quality, indicates predominantly no overall impact on marine water quality during all stages of an offshore wind farm. This implies no overall impact to regulating and maintenance ecosystem services.	As per previous marine water and sediment quality section under 'Provisioning ecosystem service, which concludes that with the factored in mitigation measures, such as production and adherence to an EMP and MPCP, there will be no adverse significant effects. Further supporting evidence on the absence of water quality impacts is provided in Volume III, Appendix 7.1: Water Framework Directive (Revised March 2026) due to the Proposed Development, which concludes that the Proposed Development will not cause or contribute to the deterioration of waterbodies status under the WFD or jeopardise the potential for water bodies to achieve 'Good' status.	**Imperceptible adverse to slight adverse** effects are predicted for marine water and sediment quality receptors (alone and cumulatively), as a result of the Proposed Development. In addition, the Proposed Development will not cause or contribute to the deterioration of waterbodies status under the WFD or jeopardise the potential for water bodies to achieve 'Good' status. As there are no significant effects anticipated on the specific marine water and sediment quality receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services.
Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026)	Subtidal and intertidal ecology must be maintained to ensure habitats remain suitable for marine organisms. The Proposed Development must ensure that the works do not impact predator and prey relationships, and trophic guilds inhabiting subtidal and intertidal areas through anthropogenic pressures. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding habitat, non-native species and Electromagnetic Field (EMF), shows increases in non-native species abundance and habitat loss due to smothering. There was no impact on particle size or condition, health, injury, or community behaviour as a result of EMF emissions. There is overall negative to no impact to regulating and maintenance ecosystem services.	Factored in mitigation measures consist of: • CBRA (to be produced pre-construction) - The aim of the CBRA is to undertake a risk assessment in order to determine suitable burial depths for a cable along the entire route to protect the cable from third party and natural hazards. • Adherence to a Rehabilitation Schedule - The Rehabilitation Schedule outlines measures for the decommissioning of the Proposed Development (Volume II, Appendix 4.1: Rehabilitation Schedule). • Implementation of an EMP - The EMP (Volume III, Appendix 25.1: EMP (Revised March 2026)) provides detail on (but not limited to) environmental policy, marine pollution and contingency planning, marine invasive and non-indigenous species, environmental incident reporting, waste management, and rehabilitation/decommissioning plans. • An MPCP - Ensures plans are in place to manage any marine pollution spills and including key emergency contact details. • Adherence to a Construction Noise Management Plan (Volume III, Appendix 25.8: CNMP (Revised March 2026)) - This will monitor the noise during piling including wind speed and direction as well as implementing use of slow and soft starts during piling activities. • An Invasive Non-Indigenous Species Management Plan will be implemented (Volume III, Appendix 25.4: INNSMP) - The plan outlines measures that will ensure vessels comply with the IMO	**Imperceptible adverse to moderate adverse (not significant)** effects are predicted for subtidal and intertidal ecology receptors, including those that may occur through inter-related factors. Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner Marine Reporting Unit or broad habitat types therein or jeopardise the attainment of Good Ecological Status due to the Proposed Development. As such, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services. The Benthic Subtidal and Intertidal Ecology chapter (Volume II, Chapter 9) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
		ballast water management guidelines and the Sea Pollution (Ballast Water Management Convention) Regulations 2023., it will consider the origin of vessels and contain standard housekeeping measures for such vessels, as well as measures to be adopted in the event that a high alert species is recorded. • Confirmatory surveys to be undertaken within the Array Area and Cable Corridor and Working Area - Confirmatory surveys will include a geophysical survey carried out prior to construction which will confirm the location and extent of any potential areas of Annex I *Sabellaria* reef habitat which will then be ground truthed via underwater video (i.e. remote operated vehicle (ROV)). Any areas of Annex I *Sabellaria* reef habitat identified will be avoided via micro-routing and micro-siting of infrastructure. • Development issue of a VMP to all project vessel operators - Issue of a Code of Conduct to all project vessel operators to advise on how to avoid impacts on benthic habitats and species. No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on subtidal and intertidal benthic ecology. Further supporting evidence on the absence of benthic subtidal impacts is provided in Volume III, Appendix 7.1: Marine Strategy Framework Directive (Revised March 2026), which concludes that the Proposed Development will not result in a deterioration of the current overall status of the Celtic Sea North Inner Marine Reporting Unit or broad habitat types therein or jeopardise the attainment of Good Ecological Status due to the Proposed Development.	
Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026)	Fish, shellfish and sea turtle ecology must be maintained to support indigenous fish and shellfish populations. The Proposed Development must ensure that the works do not impact predator and prey relationships, and trophic guilds of fish populations within the vicinity through anthropogenic pressures. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding for habitat, benthic, EMF and sediment - indicates an overall negative (but not significant with regards EIA) impact on fish and shellfish habitat due to smothering from increased SSC causing damage to fish and eggs; an increased risk of non-auditory injury and increase in non-native species abundance. When filtering for the same themes, there was overall no impact on condition, health or injury of fish and shellfish due to the presence of EMF., however some negative behavioural impacts were identified via laboratory studies. This suggests negative to no impact on associated provisioning and cultural ecosystem services.	Factored in mitigation measures consist of: • CBRA - The aim of the CBRA is to undertake a risk assessment in order to determine suitable burial depths for a cable along the entire route to protect the cable from third party and natural hazards. This includes identifying all hazards to the cable and carrying out a risk assessment to make recommendations on the burial depth required along the length of the cable to ensure that the risk to the cable is within acceptable limits. The CBRA includes an assessment of seabed conditions (based on available survey data) and an assessment of shipping, fishing, dredging, military activities etc. Burial requirements are normally driven by the risk from fishing gear and vessel anchors, as well as the seabed conditions along the cable route (which affects the anchor and fishing gear penetration depths). • Development of and adherence to a Rehabilitation Schedule (Volume III, Appendix 4.1). • Development of and implementation of an EMP - This includes mitigation/monitoring measures and commitments made within the EIAR, including but not limited to chemical usage, invasive and non-native species, pollution prevention and waste management. • An MPCP will be included in the EMP - Ensures plans are in place to manage any marine pollution spills including key emergency contact details. • A confirmatory survey to be undertaken within the Array Area and Cable Corridor and Working Area to verify the presence/ absence of any areas of reef habitat and blue mussel beds. • An Invasive Non-Indigenous Species Management Plan will be implemented (Volume III, Appendix 25.4: INNSMP) - The plan outlines measures that will ensure vessels comply with the International IMO ballast water management guidelines and the Sea Pollution (Ballast Water Management Convention) Regulations 2023., it will consider the origin of vessels and contain	**Imperceptible adverse to slight adverse** effects are predicted for fish, shellfish and sea turtle ecology receptors as a result of the Proposed Development. As there are no significant effects anticipated on the specific fish and shellfish ecology receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services. The Fish, Shellfish and Sea Turtle Ecology chapter (Volume II, Chapter 10) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
		standard housekeeping measures for such vessels, as well as measures to be adopted in the event that a high alert species is recorded. • Implementation of and adherence to Marine Mammal Mitigation Plan (MMMP) (Volume III, Appendix 25.2: MMMP (Revised March 2026)) - This identifies appropriate mitigation measures during offshore activities that are likely to produce underwater noise and vibration levels capable of potentially causing injury or disturbance to marine mammals. Factored-in measures adopted to reduce the risk of injury to marine mammal receptors as described in the plan will also be employed to reduce the risks to other marine megafauna that can be visually detected on the surface of the sea. Therefore, both sea turtles and basking shark are included as part of the MMMP. • VMP - An Environmental VMP will be implemented which includes best practice guidance measures to minimise the potential for collision risk, potential injury to, and disturbance of marine megafauna from vessel activities. • Cables will be buried where possible and protected where not possible Reduces the effects of EMF. • Management of bentonite spills via good working practices - Monitoring of mud volumes and pressure, detection of break outs and pausing drilling, plugging fissures and ongoing monitoring. • Maximum vessel numbers - Commitment to the maximum vessel numbers as set out in Volume II, Chapter 4 Description of Development (Revised March 2026). • Use of soft starts - Adherence to soft starts and maximum piling energies as set out in Volume II, Chapter 4 Description of Development (Revised March 2026).	
		No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on fish and shellfish ecology. To note, the assessment presented in Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026), notes the presence of scour protection may positively benefit some species, such as plaice and lemon sole, that utilise the nearby soft sediment environment by increasing food availability and may potentially positively benefit blue mussels by providing potential new habitat.	
Volume II, Chapter 11: Marine Mammals (Revised March 2026)	Marine mammal receptors must be maintained to ensure they support marine mammal populations. The Proposed Development should not impact areas inhabited by marine mammals through anthropogenic pressures which impact the population abundance, distributional range, diversity or habitat; or through the introduction of energy that may be harmful to marine animals. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding marine mammals, shows an overall negative impact on behaviour due to underwater noise and impacts of suspended sediments on marine mammals and megafauna. Harbour Porpoise (*Phocoena Phocoena*), Grey Seal (*Halichoerus grypus*) and Harbour seal (*Phoca vitulina*) are generally at a higher risk of collision during operation of OWFs. There is overall no	Factored in mitigation measures consist of: • EMP – An EMP will be implemented. The EMP provides the overarching framework for environment management during construction, O&M, and decommissioning phases of the Proposed Development. • Cables will be buried where possible and protected where not possible which reduces the effect of EMF. • MMMP - A MMMP will be implemented. The MMMP details the piling methodology, duration of piling, soft-start procedures, maximum piling energy and details of mitigation and monitoring parameters • MMMP - A MMMP will be implemented for Unexploded Ordinance (UXO) clearance detailing the clearance methodologies, and details of mitigation and monitoring parameters • MMMP – A MMMP for site surveys will be implemented, detailing the survey equipment to be deployed, details of mitigation and monitoring parameters • Environmental VMP - The implementation of an EVMP which includes best practice guidance measures to minimise the	**Imperceptible adverse to slight adverse** effects are predicted for marine mammal receptors, as a result of the Proposed Development. As there are no significant effects anticipated on the specific marine mammals receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services. The Marine Mammals chapter (Volume II, Chapter 11) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	impact on the foraging ability of marine mammals during periods of increased SSC.	potential for collision risk, potential injury to, and disturbance of marine mammals from vessel activities. • Monitoring - Monitoring has been proposed to understand the potential for behavioural disturbance to marine mammals during piling. Such monitoring will include both visual monitoring and the use of Passive Acoustic Monitoring (PAM) No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on marine mammals.	
Volume II, 12: Offshore Ornithology (Revised March 2026)	Ornithological receptors must be maintained to support bird populations. To ensure that the offshore area impacted by the Proposed Development does not impact areas inhabited by birds through anthropogenic pressures such as collision or displacement; introduction of non-native species; adverse effects of increased nutrient levels on marine water quality. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding birds, habitat and noise, show an overall negative impact on collision and displacement risk; the barrier effect; habitat quantity, quality or natural extant and a decrease in foraging habitat. There is overall no impact on abundance of species or on noise disturbance.	Factored in mitigation measures consist of: • EMP – An EMP will be implemented. The EMP provides the overarching framework for environment management during construction, O&M, and decommissioning phases of the Proposed Development. • Environmental VMP - The implementation of an EVMP which includes best practice guidance measures to minimise the potential for collision risk, potential injury to, and disturbance of marine mammals from vessel activities. • Best practice vessel and marine machinery operation will be complied with. • Maximum number of wind turbines of 53. The number of wind turbines has been refined to minimise the potential collision risk impacts (see Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026)). • Minimum lower blade tip height of 37 m above LAT - Minimises potential seabird collision risks since the abundance of birds decreases with increasing height above the sea surface. No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on offshore ornithology.	**Imperceptible to moderate (not significant)** effects are predicted for ornithology receptors, as a result of the Proposed Development. As there are no significant effects anticipated on the specific ornithology receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services. The Offshore Ornithology chapter (Volume II, Chapter 12) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Volume II, Chapter 13: Offshore Bats (Revised March 2026)	Offshore bat receptors should be maintained to support bat populations. To ensure the Proposed Development does not impact offshore bats as a result of anthropogenic pressures such as collision, barotrauma or displacement.	Factored in mitigation measures consist of: • Maximum number of wind turbines of 53. The number of wind turbines has been refined to minimise the potential collision risk impacts (see Chapter 3: Consideration of Alternatives (Revised March 2026)). • Minimum lower blade tip height of 37 m above LAT - Minimises potential bat collision risks since most activity occurs below 40m. No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts on offshore bats.	**No significant** effects are predicted for offshore bats, as a result of the Proposed Development. As there are no significant effects anticipated on the specific offshore bat receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to lifecycle and habitat services. The Offshore Bats chapter (Volume II, Chapter 13) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Pest and Disease Control			
Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026)	Pests and diseases cause economic loss through damage to organism and habitat health and biodiversity. Predators and parasitoids can control these invasive organisms as a biological control service. Predatory species of fish and shellfish can provide this biological control service, however they can also be adversely affected by INNS introduction through competition for prey and proliferation of new diseases.	As per previous fish, shellfish and sea turtle section under 'Lifecycle and habitat services', which concludes that with the factored in mitigation measures, such as production and adherence to an Invasive Non-Indigenous Species Management Plan (Volume III, Appendix 25.4: INNSMP), there will be **no adverse significant effects.**	**Imperceptible adverse to slight adverse** effects are predicted for fish, shellfish and sea turtle ecology receptors (alone and cumulatively) as a result of the Proposed Development. As there are no significant effects anticipated on the specific fish and shellfish ecology receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to pest and disease control services.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	The Proposed Development must minimise introduction of INNS that could become pests or introduce diseases to the existing ecosystem.		
Volume II, Chapter 9: Benthic and Intertidal Ecology (Revised March 2026)	Pests and diseases cause economic loss through damage to organism and habitat health and biodiversity. Predators and parasitoids can control these invasive organisms as a biological control service. Predatory species of fish and shellfish can provide this biological control service, however they can also be adversely affected by non-native species introduction through competition for prey and proliferation of new diseases. The Proposed Development must minimise introduction of non-native organisms that could become pests or introduce diseases to the existing ecosystem wherever possible.	As per previous benthic and intertidal ecology section under 'Lifecycle and habitat services', which concludes that with the factored in mitigation measures, such as production and adherence to an Invasive Non-Indigenous Species Management Plan (Volume III, Appendix 25.4: INNSMP), there will be **no adverse significant effects**.	**Imperceptible adverse to moderate adverse (not significant)** effects are predicted for subtidal and intertidal ecology receptors (alone and cumulatively), including those that may occur through inter-related factors. As such, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to pest and disease control services.
Cultural services			
Recreational Services			
Volume II, Chapter 10: Fish and Shellfish (Revised March 2026)	Recreational services contribute over EU 1.5 billion to the Irish economy each year (Norton *et al*., 2018). The recreational activity of fishing from the sea or shore contributed over EU 600 million to this total in 2014 (Norton *et al*.,2018). In order to maintain this ecosystem service in the future, the Proposed Development must ensure the population abundance, distribution, diversity and habitat of fish and shellfish is not adversely affected. This would prevent a potential indirect impact on recreational fishing.	As per previous fish and shellfish ecology section under 'Lifecycle and habitat services', which concludes that with the factored in mitigation measures, such as development of and adherence to a CBRA, EMP and the use of soft start, there will be **no adverse significant effects**.	**Imperceptible adverse to slight adverse** effects are predicted for fish, shellfish and sea turtle ecology receptors (alone and cumulatively) as a result of the Proposed Development. As there are no significant effects anticipated on the specific fish and shellfish ecology receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to recreational services associated with recreational fishing.
Volume II, Chapter 11: Marine Mammals (Revised March 2026)	Whale and dolphin watching contributed over EU 9 million to the Irish economy in 2014 (Norton *et al*., 2018). In order to maintain this ecosystem service in the future, the Proposed Development must ensure the population abundance, distribution, diversity and habitat of marine mammals is not adversely affected. This would prevent a potential indirect impact on recreational whale and dolphin watching activities.	As per previous marine mammal section under 'Lifecycle and habitat services', which concludes that with the factored in mitigation measures, such as implementation of a MMMP, that there will be **no adverse significant effects**.	**Imperceptible adverse to slight adverse** effects are predicted for marine mammal receptors (alone and cumulatively), as a result of the Proposed Development. As there are no significant effects anticipated on the specific marine mammals receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to recreational services associated with whale and dolphin watching.
Volume II, Chapter 12: Offshore Ornithology (Revised March 2026)	Recreational services contribute over EU1.5 billion to the Irish economy each year (Norton *et al*., 2018). Bird watching contributed over EU 27 million to this total in 2014 (Norton *et al*., 2018). In order to maintain this ecosystem service in the future, the Proposed Development must ensure the population abundance, distribution, diversity and habitat of birds is not adversely affected. This would prevent a potential indirect impact on recreational bird watching.	As per previous ornithology section under 'Lifecycle and habitat services', which concludes that with the addition of the primary mitigation measures, such as minimum lower blade tip height and best practice vessel and marine machinery operation, there will be **no adverse significant effects**.	**Imperceptible to moderate (not significant)** effects are predicted for ornithology receptors (alone and cumulatively), as a result of the Proposed Development. As there are no significant effects anticipated on the specific ornithology receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to recreational services associated with bird watching.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
Volume II, Chapter 15: Shipping and Navigation (Revised March 2026)	Recreational activities involving vessels include fishing, sailing and diving are included in the Recreational services contribution of over EU 1.5 billion to the Irish economy each year (Norton *et al.*,2018). In order to maintain this provision, the Proposed Development must avoid, minimise or mitigate significant adverse impacts on recreational vessel activities, such as fishing, sailing and diving. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding human recreational boating and fishing activities showed an overall positive impact on cultural services, including a positive increase in catch per unit effort, and on use of seascape. Negative impacts were also recorded as potential effects on recreational fishing activity.	Factored in mitigation measures consist of: • Advisory safe passage distances – Application and use of 'rolling' 500 m advisory safe passing distances surrounding all fixed structures where work is being undertaken by a construction or maintenance vessel, and around cable installation/maintenance vessels. – Application and use of 50 m advisory safe passing distances around all surface structures up until the point of commissioning. • Appropriate vessel health and safety including IMO conventions and health and safety requirements, including Marine Survey Office (MSO) requirements for vessel certification. • CBRA undertaken pre-construction including consideration of under keel clearance and appropriate cable protection applied based upon the outcomes. • Charting of all structures associated with the Proposed Development on relevant nautical and electronic charts. • Lighting and marking to be agreed with Irish Lights via a LMP. • MPCP to ensure plans are in place to manage any marine pollution spills. • Use of a temporary guard vessel where justified by risk assessment to allow protection of any particularly sensitive operations undertaken. • Circulation of information via Notice To Mariners (NtMs) and other appropriate methods including FLO. • Implementation of a buoyed construction/decommissioning area around the Array Area during the respective phases. • Application of Search & Rescue and Emergency Response for OREI (Standard Operating Procedure 07-2025).with respect to WTG layout design and construction, undertaken in liaison with Irish Coast Guard (IRCG) including the agreement of a Search and Rescue (SAR) checklist. This includes the submission of "supporting documentation" to IRCG if requested. • Compliance from all project vessels with Irish Law (including the holding of correct certification as required by MSO), and international maritime regulations as adopted by the relevant flag state including International Regulations for Preventing Collisions at Sea (COLREGs) (IMO, 1972/77) and SOLAS (IMO, 1974). No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts for shipping and navigation.	The EIAR impact assessment has concluded that the significance of risk for all potential impacts to shipping and navigation is broadly acceptable or tolerable with mitigation and As Low As Reasonably Practicable (ALARP), with **no significant adverse effects** anticipated. As such it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to recreational services associated with vessel activities such as fishing, sailing and diving. The Shipping and Navigation chapter (Volume II, Chapter 15) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026)	Other recreational activities associated with the seascape and marine landscape contributed over EU 970 million to the Irish economy in 2014 (Norton *et al.*, 2018). In order to maintain this ecosystem service in the future, the Proposed Development must avoid, minimise and mitigate significant adverse impacts to the seascape and landscape and visual assets (SLVIA). However, in line with NMPF Seascape and Landscape Policy 1 where it is not possible to mitigate harm, then the public benefit for proceeding with the proposal must outweigh the harm to the significance of seascape, landscape and visual assets.	Factored in mitigation measures consist of: • Implementation of an adherence to the LMP - The LMP confirms compliance with legal requirements with regards to shipping, navigation and aviation marking and lighting. • Promulgation of information to the Irish Aviation Authority (IAA) - The IAA will be informed of the locations, heights and lighting status of the wind turbines, including estimated and actual dates of construction and the maximum heights of any construction equipment to be used, prior to the start of construction, to allow inclusion on aviation charts and in the IAA Integrated Aeronautical Information Package (IAIP) (Volume III, Appendix 25.6: LMP (Revised March 2026)). • Layout design - The layout of WTGs and substation(s) have been designed in such a way as to minimise the impacts on SLVIA where possible. • Charting of all structures associated with the Proposed Development on relevant nautical and electronic charts (Volume	To comply with Seascape and Landscape Policy 1, the public benefits of proceeding with the Proposed Development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). In following the mitigation hierarchy and setting out the public benefits of proceeding with the Proposed Development, the Proposed Development complies with this Seascape and Landscape Policy 1. **Minor (not significant) to Major (significant)** effects are predicted for SLVIA receptors, as a result of the Proposed Development. As such it can be concluded that there will be some impediment to the ability of normal ecosystem functions and services to function with regards to recreational services relating to enjoyment of the marine seascape. The Seascape, Landscape and Visual Impact Assessment chapter (Volume II, Chapter 17) assessed the potential for project alone

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding seascape and categories of humans interacting with the environment showed an acceptance of offshore wind farms by the general public, tourists and some fishermen. There was an overall negative effect on the seascape of areas with offshore wind farms, indicated by a number of different demographics. There are some positive and some negative impacts to cultural ecosystem services in relation to seascape, landscape and visual impacts.	III, Appendix 25.7: Vessel Management Plan). To ensure third party vessels are aware of the Proposed Development and associated locations to facilitate passage planning and minimise allision risk. • Aviation lighting - Aviation lighting will include WTG mounted lights of up to 2,000 Candela (Cd) displayed at night only. Dimmable to 200 Cd when visibility is greater than 5 km. White light fittings will be fully cut off so that practically no light will be emitted below the horizon Regarding SLVIA, **significant adverse effects** have been identified in relation to: • Visual receptors at 24 of the 29 viewpoints. • Visual receptors experiencing views of night-time lighting at three of the four representative viewpoints assessed. • Visual receptors travelling along parts of the R750, Dublin – Cherbourg ferry routes and railway between Greystones and Wicklow. Receptors along other parts of these routes will not experience significant effects. • One seascape character receptor, the RSCA 13: South East Irish Sea, within which the Array Area is located. • Three landscape character receptors, comprising Coastal (Wexford) Landscape Character Area (LCA), Northern Coastal Area (Wicklow) LCA and Southern Coastal Area (Wicklow) LCA. • One landscape designation, the Bray Head Special Amenity Area Order (SAAO). A number of factored in mitigation measures have been included within the Proposed Development and are committed to be delivered by the Developer as part of the Proposed Development as listed above. In order to minimise significant adverse impacts on receptors, alternative locations and designs for the Proposed Development were considered and these are presented in Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026). White aviation lights will be fully cut off so that practically no light will be emitted below the horizontal. However, despite the use of factored in measures significant adverse impacts on the seascape and landscape of the area cannot be mitigated.	impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.
Volume II, Chapter 21: Population and Human Health (Revised March 2026)	Other recreational activities associated with the seascape and marine landscape contributed over EU 970 million to the Irish economy in 2014 (Norton *et al*., 2018). In order to maintain this ecosystem service in the future, the Proposed Development must avoid, minimise and mitigate significant adverse impacts to population and human health and any associated impacts on recreational activities.	Factored in mitigation measures consist of: • Appointment of a Community Engagement Manager during the pre-construction and construction phase - It is best practice to involve a Community Engagement Manager. • Appointment of a Financial Liability Officer - It is best practice to involve a Financial Liability Officer. No additional mitigation or monitoring measures are considered necessary for the construction, operation and decommissioning phases specific to the potential impacts for population and human health.	The EIAR concludes that there will be: • no significant impacts on the tourism economy. • no significant impacts on tourism assets. • no significant impacts on residential amenities and community facilities. **No significant** effects are predicted for population and human health, as a result of the Proposed Development. As there are no significant effects anticipated on the specific population and human health receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to recreational services. The Population and Human Health chapter (Volume II, Chapter 21) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above ecosystem functions and services conclusions also include consideration of cumulative impacts.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
Scientific and Educational Services			
Volume II, Chapter 6: Coastal Processes (Revised March 2026) Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology (Revised March 2026) Volume II, Chapter 10: Fish, Shellfish and Sea Turtle Ecology (Revised March 2026) Volume II, Chapter 11: Marine Mammals (Revised March 2026) Volume II, Chapter 12: Offshore Ornithology (Revised March 2026) Volume II, Chapter 13: Offshore Bats (Revised March 2026) Volume II, Chapter 15: Shipping and Navigation (Revised March 2026) Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026)	Coastal processes, information on contaminants within the marine environment, ecosystems including benthic, fish marine mammal and ornithology, offshore bats, navigational and shipping and information on the marine archaeology underpin entire fields of scientific research and education, particularly relating to life sciences. Across Ireland, there are a number of research institutions and agencies as well as university and government departments dedicated to scientific research and education surrounding ecosystems. In order to maintain this ecosystem service in the future, the Proposed Development must avoid, minimise and mitigate significant adverse impacts to scientific and educational services and where possible increase the opportunity for these services.	Positive scientific and educational outcomes associated with the Proposed Development include: • There is a large amount of data that has been collected from the vicinity of the Proposed Development, and a large number of studies conducted, as part of the EIAR and consenting process. ~Data is publicly available as part of the consent application[1]. • If the Proposed Development is consented, there will be a requirement to conduct a range of pre and post construction monitoring. Data collected as part of any required monitoring will be made publicly available. • The Proposed Development has undertaken a number of educational and outreach activities, including school visits to provide information on the ability of OWF to contribute toward a green energy future. • The Proposed Development are also committed to undertaking appropriate monitoring to show the recovery of any impacted areas, which will further improve the understanding of potential impacts to and recovery of marine systems following construction of the OWF. • The Arklow Bank Wind Park 2[2] newsletter is produced on a regular basis and includes a summary of a number of activities and initiatives, which include a mentoring scheme with local secondary school students and a community fund to support local initiatives. As such it can be concluded that the Proposed Development will positively contribute towards scientific and educational services.	With the range of positive outcomes associated with the Proposed Development and science and education, it can be concluded that there will be a positive improvement to the ability of normal ecosystem functions and services with regards to science and educational services.
Marine heritage, culture and entertainment			
Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026)	Inspiration for culture, art and design and benefits from engaging with marine heritage is difficult to quantify. This ecosystem service remains important to the Irish population. In order to maintain the provision of marine heritage, culture and entertainment as an ecosystem service, the Proposed Development must avoid, minimise or mitigate harm to the significant of heritage assets. However, in line with NMPF Heritage Assets Policy 1 where it is not possible to mitigate harm, then the public benefit for proceeding with the proposal must outweigh the harm to the significance of heritage assets. UKERC database which provides wider evidence of potential impacts, which are not related to the Proposed Development, including information regarding archaeology, indicates an overall negative impact on archaeological features during all stages of an offshore wind farm development. There is overall negative impact to cultural ecosystem	Primary mitigation measures consist of: • The principal of avoidance has informed the design process, whereby impacts on known archaeological sites have been avoided wherever possible. • Archaeological Exclusion Zones (AEZ) will be established around each known shipwreck site and potential site, within which no installation activities should take place. • Pre-construction marine geophysical surveys, ROV surveys and geotechnical surveys conducted for the Proposed Development will be reviewed by a maritime archaeologist as part of the Proposed Development design team and the findings will be communicated to the National Monuments Service (NMS) and will inform the need for micro-siting. • An Archaeology Management Plan (AMP) has been prepared to inform the construction, operational and maintenance and decommissioning phases of works. The AMP sets out the principal protocols that the Sure Partners Ltd (SPL – the Applicant) will put in place to ensure the protection of archaeological heritage through the course of the Proposed Development lifetime. • Project maritime archaeologists, operating under licence from the Department of the Environment, Heritage and Local Government (DEHLG), will be engaged on the Proposed Development to	It should be noted that the EIAR for the proposed development has concluded a **significant adverse effect** for one of the impacts assessed, that of indirect impact on the setting of terrestrial cultural heritage sites within the cumulative impact assessment, which cannot be mitigated. To comply Heritage Assets Policy 1, the public benefits for proceeding with the proposed development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). In following the mitigation hierarchy and setting out the public benefits of proceeding with the proposed development, the proposed development therefore complies with Heritage Assets Policy 1. As such it can be concluded that there will be some impediment to the ability of normal ecosystem functions and services to function with regards to marine heritage, culture and entertainment services relating to marine archaeology and cultural heritage. The Marine Archaeology and Cultural Heritage chapter (Volume II, Chapter 18) assessed the potential for project alone impacts and cumulatively with other plans and projects. As such, the above

[1] Data can be found on the application website here: Arklow Bank Wind Park 2

[2] Latest example of the ABWP2 newsletter available here: https://www.sserenewables.com/media/1aib50mv/2025_spring_newsletter_web.pdf

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	services in relation to marine archaeology and cultural heritage.	monitor aspects of construction activities, such as observe works where material of archaeological importance may be uncovered. A number of designed-in measures and management measures (or controls) have been factored into the proposed development and are committed to be delivered by the Developer as part of the proposed development. The full suite of Factored-in measures can be found in Volume II, Chapter 25: Factored-In Measures, Mitigation and Monitoring (Revised March 2026). To note, locally the Arklow Heritage Museum is sponsored by SSE on behalf of the ABWP2 Project to improve the marine archaeology and cultural heritage for local residence.	ecosystem functions and services conclusions also include consideration of cumulative impacts.
Aesthetic services			
Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026)	The value of this ecosystem service relates to the beauty of the landscape for those viewing it. This is hard to quantify, but estimates have been made based on economic activities capitalising from a “sea view”. In 2014, aesthetic services contributed EU 68 million to the Irish economy (Norton *et al.*, 2018). In order to maintain the provision of aesthetic services, the Proposed Development must avoid, minimise or mitigate significant adverse impacts on the seascape and landscape. However, in line with NMPF Seascape and Landscape Policy 1 where it is not possible to mitigate harm, then the public benefit for proceeding with the proposal must outweigh the harm to the significance of seascape, landscape and visual assets.	As per previous seascape, landscape and visual impact assessment section under ‘Recreational Services’, which concludes that with the addition of the primary mitigation measures there will be **some significant effects**.	To comply with Seascape and Landscape Policy 1, the public benefits of proceeding with the Proposed Development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). In following the mitigation hierarchy and setting out the public benefits of proceeding with the Proposed Development, the Proposed Development complies with this Seascape and Landscape Policy 1. **Minor (not significant) to Major (significant)** effects are predicted for SLVIA receptors (alone and cumulatively), as a result of the Proposed Development. As such it can be concluded that there will be some impediment to the ability of normal ecosystem functions and services to function with regards to aesthetic services.
Volume II, Chapter 21: Population and Human Health (Revised March 2026)	The value of this ecosystem service relates to the beauty of the landscape for those viewing it. This is hard to quantify, but estimates have been made based on economic activities capitalising from a “sea view”. In 2014, aesthetic services contributed EU 68 million to the Irish economy (Norton *et al.*, 2018). In order to maintain this ecosystem service in the future, the Proposed Development must avoid, minimise and mitigate significant adverse impacts to population and human health and any associated aesthetic services.	As per previous population and human health section under ‘Cultural services’, which concludes that with the factored in mitigation measures, such as appointment of a Community Engagement Manager and Financial Liability Officer, that there will be **no adverse significant effects**.	**No significant** effects are predicted for population and human health, (alone and cumulatively) as a result of the Proposed Development. As there are no significant effects anticipated on the specific population and human health receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to aesthetic services.
Spiritual and emblematic values			
Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026)	It is difficult to quantify the spiritual and emblematic value held by individuals in relation to the marine environment. Marine archaeology and cultural heritage can provide benefits for associated spiritual and emblematic values. This ecosystem service remains important to the Irish population, and locally to residents in Arklow town.	As per previous seascape, landscape and visual impact assessment section under ‘Marine heritage, culture and entertainment, which concludes that with the addition of the primary mitigation measures there will be **some significant effects**.	To comply with Seascape and Landscape Policy 1, the public benefits of proceeding with the Proposed Development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). In following the mitigation hierarchy and setting out the public benefits of proceeding with the Proposed Development, the Proposed Development complies with this Seascape and Landscape Policy 1.

EIAR Chapter	Introduction and wider UKERC evidence	Mitigation measures	Impact Assessment summary
	In order to maintain the provision of aesthetic services, the Proposed Development must avoid, minimise or mitigate significant adverse impacts on seascape, landscape and visual. However, in line with NMPF Seascape and Landscape Policy 1 where it is not possible to mitigate harm, then the public benefit for proceeding with the proposal must outweigh the harm to the significance of seascape, landscape and visual assets.		**Minor (not significant) to Major (significant)** effects are predicted for SLVIA receptors (alone and cumulatively), as a result of the Proposed Development. As such it can be concluded that there will be some impediment to the ability of normal ecosystem functions and services to function with regards to aesthetic services.
Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026)	It is difficult to quantify the spiritual and emblematic value held by individuals in relation to the marine environment. Marine archaeology and cultural heritage can provide benefits for associated spiritual and emblematic values. This ecosystem service remains important to the Irish population and locally to residents in Arklow town.. In order to maintain the provision of aesthetic services, the Proposed Development must avoid, minimise or mitigate significant adverse impacts on heritage assets. However, in line with NMPF Heritage Assets Policy 1 where it is not possible to mitigate harm, then the public benefit for proceeding with the proposal must outweigh the harm to the significance of heritage assets.	As per previous marine archaeology and cultural heritage assessment section under 'Recreational Services', which concludes that with the addition of the primary mitigation measures there will be some significant effects.	It should be noted that the EIAR for the proposed development has concluded a **significant adverse effect** on indirect impact on the setting of terrestrial cultural heritage sites within the cumulative impact assessment, which cannot be mitigated. To comply Heritage Assets Policy 1, the public benefits for proceeding with the proposed development is provided in Volume II, Chapter 1: Introduction (Revised March 2026). In following the mitigation hierarchy and setting out the public benefits of proceeding with the proposed development, the proposed development therefore complies with Heritage Assets Policy 1.
Volume II, Chapter 21: Population and Human Health (Revised March 2026)	It is difficult to quantify the spiritual and emblematic value held by individuals in relation to the marine environment. Population and human health can provide benefits for associated spiritual and emblematic values. This ecosystem service remains important to the Irish population. In order to maintain the provision of aesthetic services, the Proposed Development must avoid, minimise or mitigate significant adverse impacts on population and human health.	As per previous population and human health section under 'Cultural services', which concludes that with the factored in mitigation measures, such as appointment of a Community Engagement Manager and Financial Liability Officer, that there will be **no adverse significant effects**.	**No significant** effects are predicted for population and human health (alone and cumulatively), as a result of the Proposed Development. As there are no significant effects anticipated on the specific population and human health receptors, including those that may occur through inter-related factors, it can be concluded that there will be no impediment to the ability of normal ecosystem functions and services to function with regards to spiritual and emblematic values.

1.8 Summary

1.8.1.1 An assessment of impacts (both positive and negative) on relevant ecosystem functions and services and include mitigation measures, as appropriate has been undertaken in response to the RFI line item 4 that was received from ACP.

1.8.1.2 Ecosystem services have been screened for possible interaction with the Proposed Development. With those screened in as relevant being assessed against the outcomes of the assessments undertaken in the EIAR topic chapters with primary and, where required, additional mitigation measures. The UKERC database provided information on the findings from OWF studies undertaken within each relevant ecosystem service, including a number of UK OWFs.

1.8.1.3 Each of the EIAR chapters referred to within this report included an assessment of the potential for project alone impacts and cumulatively with other plans and projects. As such, the ecosystem functions and services conclusions presented above also include consideration of cumulative impacts.

1.8.1.4 The outcome of individual receptor assessments concluded no material impact on the ability of normal ecosystem functions will result from the Proposed Development. However, due to remaining significant impacts anticipated for Seascape, Landscape and Visual Impact Assessment (Volume II, Chapter 17) and Marine Archaeology and Cultural Heritage (Volume II, Chapter 18), there is potential for some impediment to the ability of normal ecosystem services with regards to marine heritage, culture and entertainment services, aesthetic services and spiritual and emblematic values. In line with compliance under the NMPF, the public benefits for proceeding with the Proposed Development is provided in Volume II, Chapter 1: Introduction (Revised March 2026).

1.8.1.5 It is considered that although there is the potential for some impediment to a limited number of ecosystem services, that overall there is an no impediment to services due to the Proposed Development.

1.8.1.6 One of the potentially missed opportunities within the Norton *et al.* (2018) document, was the provisioning service of green energy, alongside that of commercial and recreational fishing, aquaculture, genetic material and water for non-drinking purposes. The Proposed Development as a whole, could be seen as potentially beneficial to the functioning of a number of ecosystem services, by making carbon savings overall, due to the provision of green electricity.

1.9 References

Codling Wind Park (2024). Annex 1: Ecosystem Services. Planning Report

Appendices. Available online at: https://www.pleanala.ie/publicaccess/EIAR-NIS/320768/Planning%20Documents/Planning%20Report%20Appendices.pdf [Accessed October 2025].

Common International Classification of Ecosystem Services (2023). Integrated Environmental

and Economic Accounting. Available online at: https://cices.eu/#:~:text=In%20CICES%20ecosystem%20services%20are,the%20earlier%20version%20of%20CICES [Accessed October 2025].

Convention on Biological Diversity (1992). Text and Annexes. Available online at: https://www.cbd.int/doc/legal/cbd-en.pdf [Accessed October 2025].

National Marine Planning Framework (2021). Available online at: https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/national-marine-planning-framework/ [Accessed October 2025].

IMO (1972/77). Convention on International Regulations for Preventing Collisions at Sea (COLREGs) – Annex 3. London: IMO.

IMO (1974). International Convention for the Safety of Life at Sea (SOLAS). London: IMO.

Millennium Ecosystem Assessment (2005). Available online at: https://www.millenniumassessment.org/en/Index-2.html [Accessed October 2025].

Norton, D., Hynes. S., Boyd, J. (2018). Valuing Ireland's Blue Ecosystem Services. Available online at: https://www.universityofgalway.ie/media/researchsites/semru/images/marine_ecosystem_service_non_technical_report_final.pdf [Accessed October 2025].

Szostek, C. L., Edwards-Jones, A.E., Beaumont, N. J., Watson, S. C. L. (2022). Database of Evidence for the Impact of Offshore Wind Farms on Marine Ecosystems Services. Available online at: https://data.ceda.ac.uk/edc/renewables/wind/Offshore-Marine-EcoSystem-Impact [Accessed October 2025].