



Arklow Bank Wind Park 2

Environmental Impact Assessment Report

Volume III, Appendix 11.4: Seal Survey – 2025 Survey Report (RFI
March 2026)

Sure Partners Ltd

Arklow Bank Wind Park 2: Seal Vantage Point Survey Report (RFI March 2026)

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COMMERCIAL IN CONFIDENCE



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Statement of Authority

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Acronyms

Term	Meaning
ABWP2	Arklow Bank Wind Park 2
ACP	An Coimisiún Pleanála
Co.	County
DCCAE	Department of Communications Climate Action and Environment
ECC	Export Cable Corridor
GS	Grey seal
HVAC	High Voltage Alternating Current
HWM	High-Water Mark
NPWS	National Parks and Wildlife Service
RFI	Request for Further Information
VP	Vantage Point

Units

Unit	Description
%	percentage
°C	degrees Celsius
km	kilometre
km ²	kilometre squared
km/h	Kilometre per hour
kV	kilovolt
m	metre

1. Introduction

1.1 Project Background

Sure Partners Ltd., hereafter referred to as ‘the Developer’, is proposing to develop the Arklow Bank Wind Park 2 (ABWP2) Offshore Infrastructure, hereafter referred to as the ‘Proposed Development’. The Proposed Development comprises the Array Area (the area within which the Wind Turbine Generators (WTGs), the Offshore Substation Platforms (OSPs), and associated cables and foundations will be installed) approximately 6 to 15 km east off the coast of Arklow, and the Cable Corridor and Working Area (the area within which export, inter-array and interconnector cabling will be installed). The Cable Corridor and Working Area will extend from the Array Area to the landfall site where it will meet with the consented Onshore Grid Infrastructure (OGI) at the High Water Mark (HWM). The HWM is where the geographical delineation between the onshore and offshore components of ABWP2 is made. The landfall site is located approximately 4.5 kilometres (km) to the north of Arklow at Johnstown North, Co. Wicklow and is defined as where the 220 kilovolt (kV) high voltage alternating current (HVAC) offshore Export Cable Corridor (ECC) comes ashore. The total footprint of the Proposed Development is 139.4 km².

1.2 Purpose of this Document

Following the submission of the Proposed Development consent application, An Coimisiún Pleanála (ACP) has issued the Request for Further Information (RFI). The RFI requested additional information to justify the surveys undertaken, and for further information on any ongoing surveys. The relevant points in the RFI to this document are:

- 9(c) With reference to the Guidance on Marine Baseline Ecological Assessments & Monitoring Activities for Offshore Renewable Energy Projects Part 2, April 2018, by the Department of Communications Climate Action and Environment (DCCA) (DCCA (2018) Guidance), the applicant is requested to justify: ...
 - (iii) The lack of any vantage point surveys at the cable landfall.
- 9(d): The applicant is requested to confirm whether any on-going or additional surveying has been carried out on the site in relation to mobile species since the application was lodged. If so, the applicant is invited to submit any further survey data results and incorporate these into the assessments within the application documentation as appropriate.

In response to RFI points 9c(iii) and 9(d), monthly seal Vantage Point (VP) surveys were undertaken at the cable landfall for the Proposed Development from June 2025 and the survey data results are presented in this report.

This Seal Vantage Point Survey Report presents the findings from the surveys conducted between June 2025 and November 2025.

2. Survey Methodology

2.1 Vantage Point (VP) Surveys

The seal VP survey effort has been designed in accordance with the guidance outlined in Marine Baseline Ecological Assessments & Monitoring Activities for Offshore Renewable Energy Projects – Part 2 (DCCA, 2018).

The seal VP surveys were undertaken monthly between June and November 2025 (Table 2.1). The surveys were conducted from publicly accessible VPs that were selected to overlook the landfall and the surrounding 500 m buffer zone (Figure 1). These locations were chosen to maximise visibility of key coastal features, including sheltered coves and intertidal areas, where seals may be hauled out. However, no known haul-out sites had been identified within the survey area prior to undertaking the surveys.

Three VPs were identified to provide sufficient visual coverage of the landfall site and surrounding coastal habitat. These are displayed on Figure 1 and comprised:

- VP1, located to the north at Ennereilly Beach;
- VP2, situated within the landfall site; and,
- VP3, located to the south at Johnston Bay Beach.

Surveys were conducted during optimal tidal conditions, specifically two hours before and after low tide, to maximise the likelihood of detecting hauled-out seals in accordance with DCCA (2018) guidance. Table 2.1 outlines the survey dates and times. At each VP, hourly presence/absence counts were undertaken to record seals either hauled out within the landfall site or present in the surrounding 500 m buffer zone (henceforth referred to as the Seal Survey Study Area; as illustrated in Figure 1), which includes the intertidal area and nearshore waters. Between hourly counts, the surveyor relocated to the next VP, maintaining a minimum distance of 100 m from any hauled-out seals, following the method used in the NPWS guidance (NPWS, 2010).

Table 2.1 Seal survey dates and times

Survey	Date	Start time	End time
June	26/06/2025	08:40	12:40
July	22/07/2025	13:07	17:07
August	19/08/2025	11:45	15:45
September	18/09/2025	12:37	16:37
October	21/10/2025	08:45	12:45
November	17/11/2025	12:20	16:20



Arklow Bank Wind Park 2

Seal Survey Study Area

- Legend**
- Vantage Point
 - ABWP2 Cable Corridor and Working Area
 - Seal Survey Study Area

Notes
 Microsoft, Vantor, 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

0 150 300 m

0 0.125 0.25 km

Scale	Date	Drawn By	Checked By	Approved By
1:7,500 @ A3	18/02/2026	GB	SB	LK

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Figure Reference: Ark_Fig1_SealSurveyStudyArea

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Figure Number 1

Figure 1 Seal Survey Study Area



Details on the life stage of seals were recorded during each survey, where possible. This included distinguishing between adults, juveniles, and pups, and identifying group composition. Potential disturbance events and seal behavioural responses were also recorded throughout the surveys. The type of disturbance stimuli along with abbreviated recording codes used are presented in Table 2.2, with the potential response levels provided in Table 2.3.

The seal VP surveys provided fine-scale, dedicated observations of seal presence, group composition and behaviour, including during the key periods of sensitivity (breeding and moulting).

Table 2.2 Disturbance stimuli classifications and codes

Code	Disturbance Stimuli	Code	Disturbance Stimuli
LV	Large vessel	SV	Small vessel
CE	Canoe/ kayak	CY	Cyclist
PD	Stand-up paddleboard	VH	Vehicle
OW	Other watercraft	RR	Raptor
AC	Aircraft	BI	Other bird
DR	Drone	ML	Other mammal
FS	Fisher	WE	Weather
WK	Walker	Oth	Other (describe)
WD	Walker with dog	UN	Unknown
BW	Birdwatcher/ other wildlife watcher	UD	Uncontrolled dog

Table 2.3 Level of disturbance codes

Code	Disturbance Effect
1	No effect
2	Seal wakes and/or looks at disturbance source
3	Movement as a result of stimuli
4	Seal flees for the safety of the sea, crash diving, leaving the area or is prevented from coming ashore to rest, moult or breed

2.2 Limitations

Seal VP surveys were conducted between June and November 2025, aligning with the RFI receipt and submission of responses timeline. While this survey campaign captures the grey seal *Halichoerus grypus* breeding season (August to November), it does not overlap with their annual moult, which spans December to March (DCCAE, 2018). In turn, the survey period fully coincides with the breeding, nursing, and moulting seasons of harbour seals *Phoca vitulina*, which occur from June through to September. Consequently, the results presented in this Seal VP Survey Report reflect seal presence within the Seal Survey Study Area through half of the year and most key periods of sensitivity for seal species.

Observations of seals in-water are restricted to animals visible at the surface, meaning individuals swimming underwater may go undetected. Furthermore, some coves were not visible from the selected VP locations due to accessibility constraints and health and safety protocols in relation to safe access for surveyors. As a result, complete coverage of the Seal Survey Study Area was not possible, which may have led to seals being missed during the surveys.

3. Weather

The weather conditions during each survey are summarised in Table 3.1. During all surveys, weather conditions allowed for full visibility of the seal survey area.

Table 3.1 Weather conditions during each survey

Survey	Temperature (°C)	Cloud cover (%)	Wind (km/h)	Precipitation	Notes
June	13-17	10-40	15-24	No	
July	18-19	80	9-11	Yes	Precipitation at 15:07
August	16-17	80-90	17-19	No	
September	17-20	90-100	22-27	Yes	Precipitation at 13:07 (light drizzle), 13:37 (drizzle) and at 15:37 (starts raining heavily at 15:54)
October	11-13	80-90	24-27	Yes	Precipitation at 10:45 (light drizzle)
November	8	60	6-14	No	

4. Results

4.1 Seal Count

Grey seals were the only pinniped species recorded during the surveys (Table 4.1) with a total of 30 individuals observed across all VPs and survey months (Table 4.1). Annex 1 provides the seal counts recorded in each monthly survey.

4.1.1 Spatial distribution

Of the total sightings, 26 grey seals were recorded from VP2 (landfall site), four grey seals were recorded from VP3 (Johnston Bay Beach), and no seals were recorded from VP1 (Ennereilly Beach) (Table 4.1). The seals recorded from VP2 comprised 16 individuals observed in the water and 10 individuals hauled out, whereas from VP3 all four seals were observed in the water at VP3. All sightings of seals in the water occurred within 300 m of the coastline. All hauled-out seals were located within coves at the landfall site; one cove to the north and one directly south of VP2. This spatial pattern indicates a relative preference for hauling out on sheltered coves rather than open beaches, such as were present around the VP2 location within the landfall site, in comparison to the wider Seal Survey Study Area.

Table 4.1 Monthly seal observations by location, life-history stage and behaviour. Only months with sightings have been presented.

Survey	Species	VP	In water			Hauled-out			Total
			Adult	Juvenile	Pups	Adult	Juvenile	Pups	
June	N/A	N/A	0	0	0	0	0	0	0
July	Grey seal	2	1	0	0	0	0	0	1
August	N/A	N/A	0	0	0	0	0	0	0
September	Grey seal	2	3	0	0	3	0	7	13
		3	1	0	0	0	0	0	1
October	Grey seal	2	5	0	0	0	0	0	5
		3	3	0	0	0	0	0	3
November	Grey seal	2	7	0	0	0	0	0	7

4.1.2 Temporal distribution

Seal sightings occurred in four survey months: July, September, October, and November (Table 4.1). A peak count of 14 seals was recorded during a single survey in September. This comprised four individuals in the water at VP2 and VP3, and 10 individuals hauled-out at VP2. This peak coincides with the breeding season and includes all pup sightings for the surveys.

4.1.1 Life-history stages

The breeding season for grey seals in Ireland is between August and November (DCCAE, 2018). Therefore, the presence of seal pups during the September survey suggests that grey seals are likely to be breeding in this area. All pup sightings were recorded from VP2. Grey seal pups remain on land for at least the first three weeks after birth, during which they moult their natal coat (Ó'Cadhlá *et al.*, 2013), therefore any pups observed would likely have been born at this location. This indicates that the landfall site may support a small breeding colony of grey seals (Table 4.1).

The pups observed during the September survey represented a range of developmental stages as defined by Ó'Cadhlá *et al.* (2013):

- Four pups were in early stages, characterised by white lanugo coat, indicating they were newborn or very young (**Stage I–III; 0-15 days old**).
- Two pups were beginning to shed their lanugo and transition to a grey coat, marking mid-moult (**Stage III–IV; 15-20 days old**).
- One pup was fully moulted, displaying a complete grey coat, suggesting it was nearly ready to enter the water (**Stage V; 18-25+ days old**).

As no pups were sighted during the August survey, it is estimated that all pups recorded during the September survey were less than one month old. No pups were observed in October, indicating that those seen in September had completed their moult and entered the water by the time of the October survey.

Two of the adults were clearly present with the pups, including the adult and pup at the northern cove, and one adult and pup at the southern cove.

4.2 Other Users

Observations of other users in the Seal Survey Study Area during the surveys are presented in Annex 2. A number of other users were present across the survey months including dog walkers, walkers, small vessels and fishers. However, no disturbance events were recorded while seals were present and therefore no disturbance responses were recorded.

5. Summary

Following submission of the Proposed Development consent application, ACP issued a RFI seeking justification of and/or additional baseline data on the marine mammal environment. To address the points in the RFI, monthly VP surveys of the landfall location site and adjacent coastal habitats were undertaken, to identify the presence of seal and/or haul-out sites.

Across the six seal VP surveys undertaken monthly between June and November 2025, a total of 30 grey seals were recorded, with the highest count of 14 individuals observed during the September survey. Sightings were also recorded in July, October, and November. Sightings were predominantly observed from VP2 (the landfall site) which accounted for 26 of the total observations, including the seven pups recorded. These observations suggest semi-regular presence of grey seal outside of the breeding season, and that the landfall site around VP2 supports a small breeding colony. Despite this, overall seal numbers were relatively low, suggesting limited regular use of the seal survey area by the wider grey seal population. No harbour seals were observed during any survey.

6. References

Department of Communications Climate Action and Environment (2018), 'Guidance on Marine Baseline Ecological Assessments and Monitoring Activities for Offshore Renewable Energy Projects Part 2'. <https://assets.gov.ie/static/documents/f957f02d-guidance-on-marine-baseline-ecological-assessments-monitoring-activities-for-.pdf> [Accessed: January 2026].

National Parks and Wildlife Service (2010), 'Harbour Seal Population Monitoring 2009-2010: Report No. 1', Report on a Pilot Monitoring Study Carried out in Southern and Western Ireland, 2009. [NPWS 2010 Harbour Seal pilot monitoring.pdf](#) [Accessed: November 2025].

Ó Cadhla, O., Keena, T., Strong, D., Duck, C. and Hiby, L. (2013), 'Monitoring of the breeding population of grey seals in Ireland, 2009 – 2012', Irish Wildlife Manuals, No. 74. National Parks and Wildlife Service, Department of the Arts, Heritage and the Gaeltacht, Dublin, Ireland. <https://www.npws.ie/sites/default/files/publications/pdf/IWM74.pdf> [Accessed: January 2026].

Annex 1 Seal Counts

Table A1. 1 Seal counts in June 2025

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water
						Number of adults	Number of juveniles	Number of pups	
26/06/25	1	8:40	09:20	VP1	Falling	0	0	0	0
	2	9:40	10:20	VP2	Falling	0	0	0	0
	3	10:40	11:20	VP3	Low tide	0	0	0	0
	4	11:40	12:20	VP2	Rising	0	0	0	0
	5	12:40	Final Scan	VP1 (final scan)	Rising	0	0	0	0

Table A1. 2 Seal counts in July 2025

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water	Notes
						Number of adults	Number of juveniles	Number of pups		
22/07/25	1	13:07	13:47	VP1	Falling	0	0	0	0	
	2	14:07	14:47	VP2	Falling	0	0	0	0	
	3	15:07	15:47	VP3	Low tide	0	0	0	0	
	4	16:07	16:47	VP2	Rising	1 GS	0	0	0	1 GS swimming approx. 100 m from coast.
	5	17:07	Final scan	VP1 (final scan)	Rising	0	0	0	0	

Table A1. 3 Seal counts in August 2025

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water
						Number of adults	Number of juveniles	Number of pups	
19/08/25	1	11:45	12:25	VP1	Falling	0	0	0	0
	2	12:45	13:25	VP2	Falling	0	0	0	0
	3	13:45	14:25	VP3	Low tide	0	0	0	0
	4	14:45	15:25	VP2	Rising	0	0	0	0
	5	15:45	Final scan	VP1 (final scan)	Rising	0	0	0	0



Table A1. 4 Seal counts in September 2025

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water	Notes
						Number of adults	Number of juveniles	Number of pups		
18/09/25	1	12:37	13:17	VP1	Falling	0	0	0	0	
	2	13:37	14:17	VP2	Falling	2 GS	0	7 GS	1 GS	1 GS swimming approx. from 10 m from coast. 1 GS adult and 6 GS pups hauled out at southern cove. 1 GS adult and 1 GS pup hauled out at northern cove.
	3	14:37	15:17	VP3	Low tide	0	0	0	1 GS	1 GS swimming approx. 20 m from coast

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water	Notes
						Number of adults	Number of juveniles	Number of pups		
	4 ¹	15:37	16:17	VP2	Rising	3 GS	0	6 GS	2 GS	2 GS swimming approx. 100 m and 300 m from coast. 2 GS adults and 5 GS pups hauled out at southern cove. 1 GS adult and 1 GS pup hauled out at northern cove.
	5	16:37	Final scan	VP1 (final scan)	Rising	0	0	0	0	Seals not visible from this VP.

¹ The 6 GS pups (1 at northern and 5 at southern cove) and adult grey seal (at the northern cove) recorded hauled out during Survey Hour 4 are the same individuals observed hauled out during Survey Hour 2. The adult GS at the southern cove has been assumed as the same individual. 1 GS pup was not visible at Survey Hour 4. In total, a maximum of 3 GS adults and 7 GS pups were hauled out at VP2.

Table A1. 5 Seal counts in October 2025

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water	Notes
						Number of adults	Number of juveniles	Number of pups		
21/10/25	1	8:45	9:25	VP1	Falling	0	0	0	0	
	2	9:45	10:25	VP2	Falling	0	0	0	4 GS	2 GS swimming approx. 5-10 m from coast. 1 GS swimming approx. 20 m from coast. 1 GS swimming approx. 10 m from coast
	3	10:45	11:25	VP3	Low tide	0	0	0	3 GS	1 GS swimming approx. 200 m from coast. 1 GS swimming approx. 150 m from coast. 1 GS swimming approx. 5 m from coast.



Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water	Notes
						Number of adults	Number of juveniles	Number of pups		
	4	11:45	12:25	VP2	Rising	0	0	0	1 GS	1 GS swimming approx. 5 m from coast.
	5	12:45	Final scan	VP1 (final scan)	Rising	0	0	0	0	

Table A1. 6 Seal counts in November 2025

Survey date	Survey hour	Survey start time	Survey end time	VP	Tidal range	Onshore			In water	Notes
						Number of adults	Number of juveniles	Number of pups		
17/11/25	1	12:20	13:00	VP1	Falling	0	0	0	0	
	2	13:20	14:00	VP2	Falling	0	0	0	4 GS	1 GS swimming approx. 5 m from coast. 1 GS swimming approx. 20 m from coast. 2 GS swimming approx. 5-10 m from coast
	3	14:20	15:00	VP3	Low tide	0	0	0	0	
	4	15:20	16:00	VP2	Rising	0	0	0	3 GS	1 GS swimming approx. 10 m from coast. 2 GS swimming approx. 20 m from coast.
	5	16:20	Final scan	VP1 (final scan)	Rising	0	0	0	0	

Annex 2 Other Users and Disturbance Events

Table A2. 1 Disturbance events in June 2025

Survey hour	Time of disturbance	Disturbance Event	Species and no. impacted				Reaction level	New Activity or Present Before Event	Distance (m) of Stimuli
			Adults (onshore)	Juvenile (onshore)	Adults (offshore)	Juvenile (offshore)			
1	08:40	FS	0	0	0	0	N/A	New	N/A
1	08:40	Oth (Person resting)	0	0	0	0	N/A	New	N/A
3	11:01	SV	0	0	0	0	N/A	New	N/A

Table A2. 2 Disturbance events in July 2025

Survey hour	Time of disturbance	Disturbance Event	Species and no. impacted				Reaction level	New Activity or Present Before Event	Distance (m) of Stimuli
			Adults (onshore)	Juvenile (onshore)	Adults (offshore)	Juvenile (offshore)			
1	13:07	FS	0	0	0	0	N/A	New	N/A
1	13:08	WK	0	0	0	0	N/A	New	N/A
1	13:26	SV	0	0	0	0	N/A	New	N/A
2	14:18	SV	0	0	0	0	N/A	Before	N/A
3	15:07	SV	0	0	0	0	N/A	Before	N/A
3	15:10	FS	0	0	0	0	N/A	Before	N/A



Table A2. 3 Disturbance events in August 2025

Survey hour	Time of disturbance	Disturbance Event	Species and no. impacted				Reaction level	New Activity or Present Before Event	Distance (m) of Stimuli
			Adults (onshore)	Juvenile (onshore)	Adults (offshore)	Juvenile (offshore)			
1	11:46	FS	0	0	0	0	N/A	New	N/A
1	11:48	WK	0	0	0	0	N/A	New	N/A
1	11:49	SV	0	0	0	0	N/A	New	N/A
2	12:45	SV	0	0	0	0	N/A	Before	N/A
3	13:45	SV	0	0	0	0	N/A	Before	N/A
3	13:46	SV	0	0	0	0	N/A	New	N/A
4	14:46	WD	0	0	0	0	N/A	New	N/A



Table A2. 4 Disturbance events in September 2025

Survey hour	Time of disturbance	Disturbance Event	Species and no. impacted				Reaction level	New Activity or Present Before Event	Distance (m) of Stimuli
			Adults (onshore)	Juvenile (onshore)	Adults (offshore)	Juvenile (offshore)			
1	12:37	FS	0	0	0	0	N/A	New	N/A
1	12:37	Oth (swimmer)	0	0	0	0	N/A	New	N/A
1	12:55	WD	0	0	0	0	N/A	New	N/A
1	13:08	WK	0	0	0	0	N/A	New	N/A



Table A2. 5 Disturbance events in October 2025

Survey hour	Time of disturbance	Disturbance Event	Species and no. impacted				Reaction level	New Activity or Present Before Event	Distance (m) of Stimuli
			Adults (onshore)	Juvenile (onshore)	Adults (offshore)	Juvenile (offshore)			
1	08:45	FS	0	0	0	0	N/A	New	N/A
1	08:55	WK	0	0	0	0	N/A	New	N/A
5	12:45	FS	0	0	0	0	N/A	Before	N/A



Table A2. 6 Disturbance events in November 2025

Survey hour	Time of disturbance	Disturbance Event	Species and no. impacted				Reaction level	New Activity or Present Before Event	Distance (m) of Stimuli
			Adults (onshore)	Juvenile (onshore)	Adults (offshore)	Juvenile (offshore)			
1	12:29	WK	0	0	0	0	N/A	New	N/A
1	12:44	WD	0	0	0	0	N/A	New	N/A
3	14:39	WD	0	0	0	0	N/A	New	N/A

