Arklow Bank Wind Park 2

Planning Report (Revised March 2026)

Case Reference: OA27.319864

March 2026

Turley

Contents

Client
Sure Partners Ltd

Our reference
SSEB3021

March 2026

Summary of Changes

This Report 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 Report is relevant and appropriate at the point of submission (i.e. March 2026).

In summary, the following sections of this Report have been amended (please note that this is non-exhaustive):

- Chapter 2 has been updated to reflect the current status of Arklow Bank Wind Park 1.
- Chapter 3 has been updated to provide a summary that reflects consultation that has occurred post-application in relation to matters raised via the RFI.
- Chapter 5 has been updated in relation to the description of the Proposed Development to include the reduced number of WTGs, adjusted layout along with minor WTG design updates.
- Chapter 6 has been updated in relation to the Strategic Policy Context, reflecting recent changes and updates to relevant European and national climate, energy and offshore renewable energy policy.
- Chapter 7 has been updated in relation to the assessment against national policy in light of the recently published National Planning Framework: First Revision (April 2025).
- Chapter 9 has been updated to revise the assessment of local policy objectives with respect to the revised Environmental Impact Assessment Report (EIAR) that has been submitted including chapter updates, and to address Item 14(c) of the RFI;
- Chapter 10 has been updated to provide an updated conclusion for the Proposed Development that reflects the updates that have been made as per above.

In addition to those changes above, all other sections have been adjusted to ensure consideration of the latest information as appropriate to ensure consistency and accuracy. Clarification and/or further detail has also been provided where this has been requested via the RFI, and it is confirmed that all cross-references have been updated throughout to ensure accuracy.

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

- Revised Annexes:

    - Annex 1: NMPF Compliance Table (Revised March 2026) – This is an updated appendix that supersedes the previous version.

- New Annexes:

    - Annex 2: Marine Strategy Framework Directive Assessment (RFI March 2026 – This is a new annex to this Report.

    - Annex 3: Ecosystems Function and Services Assessment (RFI March 2026) – This is a new annex to this Report.

1. Introduction

Overview

1.1 This Planning Report has been prepared by Turley on behalf of Sure Partners Ltd (hereinafter referred to as the 'Applicant'), being a wholly owned subsidiary of SSE plc.

1.2 This Report is submitted in support of an Application (case reference: OA27.319864) to An Bord Pleanála (hereinafter referred to as 'ABP') which was lodged on 6 June 2024, under Section 291 of the Planning and Development Act 2000, as amended (hereinafter referred to as 'the Act') for a Proposed Development in the maritime area.

Proposed Development

1.3 The Project is known as the Arklow Bank Wind Park 2 offshore windfarm, including both offshore and onshore infrastructure. The Proposed Development for the purpose of this Planning Report is the Arklow Bank Wind Park 2 Offshore Infrastructure (hereinafter referred to as 'ABWP2' and the 'Proposed Development'), being an offshore wind farm which is to be located c. 6 – 15 km off the coast of Co. Wicklow and Co. Wexford in the Irish Sea (hereinafter referred to as 'the Application Site').

1.4 Please refer to Section 4 of this Report for further details on the 'Application Site' and Section 5 of this Report for further details on the 'Proposed Development'.

Purpose of this Report

1.5 The purpose of this Report is to describe the nature and extent of the Proposed Development, its principal features, and to provide an overview of the relevant national, regional and local planning policy context to assist ABP in its determination of the Application.

1.6 This Report also demonstrates that the Proposed Development is consistent with the relevant national, regional and local planning policies/objectives, and would, therefore, be in accordance with the principles of proper planning and sustainable development.

Accompanying Plans and Particulars

1.7 This Report should be read in conjunction with all the plans and particulars accompanying the Application to ABP, which includes a suite of planning drawings, an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS).

Report Structure

1.8 The Planning Report is structured as follows:

- **Section 2 - Project Background**: outlines relevant background information on the Proposed Development including the relevant planning history.

- **Section 3 – Consultations:** provides an overview of the non-statutory and statutory consultations for the project.
- **Section 4 - Application Site**: describes the Application Site.
- **Section 5 - Proposed Development**: describes the Proposed Development and also outlines the need for, and benefits of, the Proposed Development.
- **Section 6 – Strategic Policy**: provides an overview of the relevant strategic European, national, regional and local polices/strategies/frameworks/plans.
- **Section 7 - National Planning Policy**: assesses the Proposed Development against relevant statutory national planning policy.
- **Section 8 - Regional Planning Policy**: assesses the Proposed Development against relevant statutory regional planning policy.
- **Section 9 - Local Planning Policy**: assesses the Proposed Development against relevant statutory local planning policy.
- **Section 10 - Conclusion**: Provides concluding comments on the acceptability of the Proposed Development.

2. Project Background

The Applicant

2.1 The Applicant (SPL) is a wholly owned subsidiary of FTSE 100 listed company SSE Plc under SSE Renewables. SSE Renewables (SSER) is a leading renewable energy developer, owner and operator, headquartered in the UK and Ireland, with a growing presence internationally. Its strategy is to lead the transition to net zero through the world-class development, construction and operation of renewable assets.

Maritime Area Consent

2.2 Projects that obtain a MAC are required to apply for all requisite consents and planning permission and will be subject to the full assessment procedures by ABP.

2.3 In December 2022, the Applicant obtained a Maritime Area Consent (MAC) (Ref 2022-MAC-002) for the construction and operation of an offshore windfarm and associated infrastructure (including decommissioning and other works) on and around Arklow Bank in the Irish Sea.

2.4 A copy of the MAC is appended to the Application Form. This Application has been prepared in accordance with the MAC as granted.

2.5 Following the grant of a MAC, the Applicant must submit the Application for permission to ABP under Section 291 of the Planning and Development Act 2000 (as amended) (hereinafter referred to as the Act). This Application is made to ABP in accordance with Section 291 of the Act.

Planning History

Arklow Bank Wind Park 1

2.6 The existing Arklow Bank Wind Park 1 (ABWP1) is surrounded by the proposed 'Array Area' for the Proposed Development, however, it is not included within the extent of the Application Site. It was constructed in 2003/2004 and consists of seven wind turbines with a combined capacity of 25.2 MW.

2.7 The turbines have a hub height of 73.5 metres and a height to blade tip of 124 metres. The turbines use a steel monopile foundation and each turbine has a landing platform for boat access. The turbines are spaced approximately 600 metres apart

2.8 A second phase of this wind farm was to be developed, consisting of 193 turbines, but this phase and planned connection to the EirGrid transmission system was cancelled in 2007.

2.9 The owner and operator of the ABWP1, Arklow Energy Limited has commenced pre-application consultation (Case Reference OC27.321635) with the appropriate local authorities to decommission ABWP1, which has reached the end of its operating life

2.10 The ABWP1 team has begun engaging with the Maritime Area Regulatory Authority (MARA) and is working closely with ABP to agree on the details of the decommissioning and removal works. Based on the fact that the ABWP1 team has commenced the pre-application process for decommissioning we expect ABWP1 to be fully decommissioned before commencement of operation of ABWP2.

Arklow Bank Wind Park 2

2.11 Planning permission has already been granted for essential enabling and supporting onshore infrastructure for the Arklow Bank Wind Park 2 project. Details on these extant planning permissions are provided below.

Onshore Grid Infrastructure

2.12 The Onshore Grid Infrastructure (OGI) for ABWP2 was approved in May 2022 by ABP (under Plan Reg. Ref. No. ABP-310090-21).

2.13 The OGI comprises transmission infrastructure and consists of all onshore electrical works from the landfall point (i.e. the High Water Mark) to the point of connection with the transmission network and includes an onshore HV export double circuit cable and an onshore substation located at the Avoca River Park in Arklow, Co. Wicklow

2.14 The OGI is necessary to connect ABWP2 to Ireland's electricity transmission grid and includes the following:

- Landfall for two offshore export cable circuits from the High Water Mark to two Transition Joint Bays at Johnstown North located c. 4.5 km to the northeast of Arklow Harbour.

- Connection by two underground 220kV high voltage alternating current cable circuits, and fibre optic cables over a distance of c.6 km, from the landfall to the new onshore 220kV substation.

- A new onshore 220kV substation to be located at Avoca River Park, Shelton Abbey & Kilbride, Arklow, Co Wicklow, approximately 2.1 km northwest of Arklow consisting of two connected compounds:

  – The transmission compound with the infrastructure to physically connect to the National Electricity Transmission Network; and

  – The connection compound with the infrastructure to allow the connection of the windfarm in accordance with EirGrid grid code requirements.

- Flood defence improvement works to the existing Avoca River Business Park flood defences located c. 500m west of substation site, a 220kV overhead line connection from the new 220kV substation at Shelton Abbey to the existing 220kV transmission network located c. 200m from the substation site.

Operations and Maintenance Facility

2.15 The onshore Operations and Maintenance Facility (OMF) for Arklow Bank Wind Park 2 was granted planning permission in June 2022 by Wicklow County Council (under Plan Reg. Ref. No. 21/1316).

2.16 The OMF will include office and welfare facilities for the management of the offshore wind farm as well as warehouse space for the storage and maintenance of machinery associated with the wind farm alongside educational spaces for visitors. It will provide a base to service ABWP2 and support its operation.

3. Consultations

Non-Statutory Community/Stakeholder Consultations

3.1 The Applicant has been undertaking a stakeholder engagement campaign since 2018.

3.2 A Consultation Report has been prepared by GoBe Consultants and is submitted with the Application. The Consultation Report contains a record of, and provides an overview of, the public/community and stakeholder consultation undertaken to date in relation to the Proposed Development.

Statutory Pre-Application Consultations

3.3 The Applicant has undertaken statutory Pre-Application consultations with ABP in accordance with Sections 287 and 287A of the Act.

3.4 The Applicant submitted a request to ABP on 23rd December 2022 to:

i. enter into Pre-Application consultations under Section 287 of the Act on the Proposed Development (Ref. No. ABP-315796-23)[1]; and

ii. enter into Pre-Application consultation under Section 287A of the Act and seek a Section 287B opinion from ABP as to flexibility with respect to the Proposed Development (Ref. No. ABP-316331-23)[2].

3.5 The Applicant met with representatives of ABP on four occasions during the Pre-Application consultation process on 13th June 2023, 23rd August 2023, 6th November 2023 and 11th December 2023.

3.6 At the meeting of 6th November 2023, the Applicant confirmed that following on from the previous meeting, the project design options had been reduced from four options to two. Please refer to 'Volume II, Chapter 3: Consideration of Alternatives (Revised March 2026)' of the EIAR for further details on the design options considered and 'Section 5 - Proposed Development' of this Report for a description of the 2 no. proposed design options.

3.7 The Section 287 Pre-Application consultations concluded on the 25th of January 2024.

3.8 On the 2nd of February 2024, the applicant received notice of ABP's Section 287B Opinion on Design Flexibility in accordance with the consultation under Section 287A of the Act.

3.9 The ABP opinion is summarised in Table 3.1 below:

[1] https://www.pleanala.ie/en-ie/case/315796
[2] https://www.pleanala.ie/en-ie/case/316331

Table 3.1: Opinion on Design Flexibility

Information	Details/Circumstances
a) The details, or group of details of the proposed development that may be confirmed after the application has been made and decided	Model and Number of Turbines Layout of turbines and associated cabling Limit of Deviation Layout of offshore platforms and associated cabling Limit of Deviation Turbine hub height (m) Rotor Diameter (m) Upper blade tip height (above Lowest Astronomical Tide) (m) Lower blade tip height (above Lowest Astronomical Tide) (m) Chord width (m) Average annual Revolutions Per Minute
b) the circumstances relating to the proposed development that indicate that it is appropriate that the proposed application be made and decided before the prospective applicant has confirmed the details referred to in paragraph (a) above.	To avail of technology developments and advancements Supply chain Procurement of projects with short term targets and ability to supply Vessel availability

3.10 In general terms, the Opinion on Flexibility confirms that the flexibility sought by the Applicant is appropriate and will enable the Applicant to avail of technology developments and advancements; allow for consenting timelines alongside technological developments in the offshore wind industry; and to take account of potential challenges on the supply chain to deliver in support of the short-term national targets. Flexibility will also be beneficial in terms of the construction vessel availability.

3.11 This Application is submitted directly to ABP for determination. In accordance with the undertaking given to ABP under Section 287(A)(2)(f) of the Act, the Applicant has provided with the Application two options in respect of each detail which is unlikely to be confirmed at the time of the Application, in compliance with ABP's Opinion, thereby setting out the information on the basis of which the Application may be decided by ABP.

Statutory Application Consultation

3.12 As part of the application submission process, the following consultation took place:

- Issuing details of the Application to the Department of Housing, Local Government and Heritage's EIA Portal.

- Direct consultation with the relevant Prescribed Bodies, Coastal Authorities and Transboundary Bodies as required under S292(3) of the Act. A schedule of all bodies notified is appended to the accompanying Application Form.

- Placing a public notice in one national newspaper (the Irish Independent) and 2 no. local newspapers (the Wicklow People and the Gorey Guardian).

- Placing a copy of the application and all accompanying documents on display in the offices of An Bord Pleanála and the offices of Wicklow County Council and Wexford County Council, being the relevant Coastal Planning Authorities; and

- Access to all plans and particulars associated with the Application will also be facilitated via a dedicated project website at: www.arklowbank2offshoreplanning.ie

3.13 Any submissions/observations arising from the Application consultation and notification process will be submitted directly to, and considered by, ABP as part of the Application assessment process.

Summary of Post Submission Consultation

3.14 During the planning application process, additional consultations were undertaken to clarify issues raised in submissions and in ABP's Request for Information. Specifically, the following consultation occurred in response to the matters that were raised:

- Meetings occurred with the Irish Coast Guard (IRCG) in June 2025 and September 2025, together with follow-up correspondence in November 2025, to address matters raised in its statutory submission and the associated RFI. These consultations informed refinements to the Proposed Development, including adjustments to the layout of Wind Turbine Generators and Offshore Substation Platforms, to optimise the search and rescue (SAR) access and coverage.

- A meeting occurred in October 2025 with the National Parks and Wildlife Service (NPWS) in relation to offshore ornithology matters raised in the observation that was received from the Development Application Unit and associated matters raised in the RFI.

- Consultation occurred in November 2025 with AirNav Ireland on civil and military aviation, with the Marine Institute in relation to cumulative effects on commercial fisheries, and with Arklow Energy Limited in relation to the existing Arklow Bank Wind Park for the purposes of cumulative assessment.

3.15 Further clarification was also sought from ABP in December 2025 in relation to specific matters raised in the RFI.

3.16 All clarifications received during consultation have been taken into account in the preparation of the RFI response.

4. Application Site

4.1 The Application Site, which covers an area of approx. 139.4 km2, is located on and around Arklow Bank in the Irish Sea approximately 6 km to the east of Arklow in County Wicklow.

4.2 The general location and extent of the Application Site is illustrated in **Figure 4.1** below.

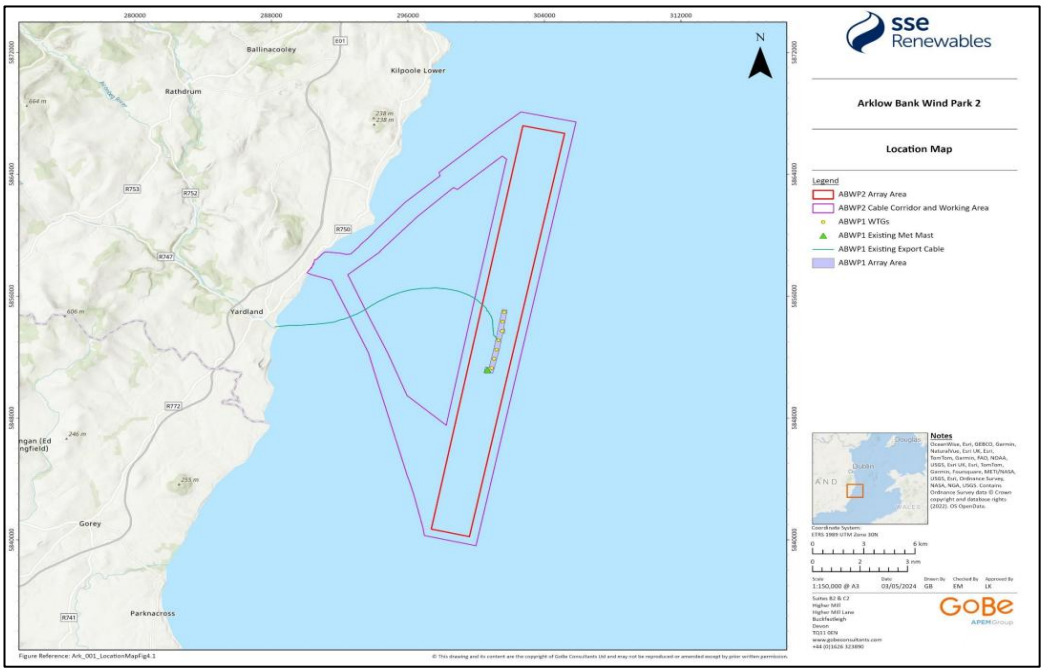


Figure 4.1: Arklow Bank Wind Park 2 Site Location Plan

4.3 Arklow Bank is a shallow offshore sandbank, measuring approximately 27 km by 2.5 km. On the bank, water depths vary between 0.6 metres and 25 metres relative to Lowest Astronomical Tide (LAT), with shallower areas particularly occurring in the vicinity of the existing seven wind turbines of ABWP1.

4.4 The general morphology of the sandbank is oriented generally in a north-south direction. There is a large variation in depth within the area, with water depths in excess of 50 metres LAT beyond the bank towards the east. The Application Site is located seaward of the High Water Mark (HWM).

4.5 The Application Site for the Proposed Development will comprise an '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). The 'Array Area' covers an area of approx. 63.4 km2 and is located approx. 6 km to 15 km off the east coast of Ireland.

4.6 The Application Site also comprises a 'Cable Corridor and Working Area' (the area within which export, inter-array and interconnector cabling will be installed) which covers an area of approx. 76.0 km2 and extends from the 'Array Area' to the HWM at Johnstown North, north of Arklow Town, Co. Wicklow where the offshore export cables make landfall (the Landfall).

5. Proposed Development

5.1 The Proposed Development is the Arklow Bank Wind Park 2 (ABWP2) Offshore Infrastructure (hereinafter referred to as the Proposed Development).

5.2 The Proposed Development is an offshore wind farm, located off the coast of Co. Wicklow and Co. Wexford, on the east coast of Ireland. A Maritime Area Consent (MAC) (Ref 2022-MAC-002) was granted in December 2022 for the construction and operation of an offshore windfarm and associated infrastructure (including decommissioning and other works) on and around the Arklow Bank in the Irish Sea.

5.3 As noted above, the site of the Proposed Development comprises an 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 a Cable Corridor and Working Area (the area within which export, inter-array and interconnector cabling will be installed). The overall Proposed Development site area is 139.4 km2 and all of the Proposed Development will be seaward of the High Water Mark (HWM). The Array Area is located approximately 6 km to 15 km off the coast and covers an area of approximately 63.4 km2. The Cable Corridor and Working Area extends from the Array Area to the HWM at Johnstown North, north of Arklow Town, Co. Wicklow where the offshore export cables make landfall (the Landfall). The area of the Cable Corridor and Working Area is 76.0 km2.

5.4 Survey reports comprising additional geophysical survey dataset conducted in 2024 has furthered understanding of bedrock elevation and has allowed the Applicant to reduce the maximum hammer piling energy required from 6,600kJ to 3,500kJ and associated adjustment of piling scenarios.

5.5 Additional data has been received from recent supply chain engagement which has enabled the Applicant to refine the blade chord width for both Project Design Options which also mitigates the effects of the Proposed Development on birds.

5.6 A submission was received from the Department of Transport where the Irish Coast Guard (IRCG) made some observations on the site layout which were subsequently noted by An Comisiún Pleanála in their RFI with respect to search and rescue access. The Maritime Navigation Safety and Emergency Response Guidance Documents for Offshore Renewable Energy Installations (OREI) were published in June 2025.

5.7 This resulted in adjustments to the layout to ensure search and rescue access to the satisfaction of the IRCG as follows:

- Reduction in the number of WTGs from 56 to 53 for Project Design Option 1;
- Adjustments to the specific location of OSPs and WTGs for both Project Design Options to optimise the search and rescue access and coverage;
- Associated requisite adjustments across both Project Design Options to the infrastructure and associated aspects of the Proposed Development which are

a function of the location of the OSPs and WTGs such as the location of cables and the location of excavation and/or disposal required for construction activities.

5.8 In order to maintain project delivery timelines, the commissioning and completions period has been optimised, therefore reducing the overall outline construction programme to 4 years.

5.9 The Proposed Development will comprise:

I. One of two Project Design Options – Project Design Option 1 (which comprises Models 1a and 1b,) or Project Design Option 2. Project Design Option 1 (Models 1a and 1b) comprises WTGs with the same rotor diameter, hub height and tip heights and with slight variations in chord width and revolutions per minute (RPM) between the two models. The Project Design Options comprise the following parameters:

Parameters	Project Design Option 1		Project Design Option 2
Number of WTGs	53		47
Hub Height (above Lowest Astronomical Tide) (m)	155		162
Rotor Diameter (m)	236		250
Upper Blade Tip Height (above LAT) (m)	273		287
Lower Blade Tip Height (above LAT) (m)	37		37
Chord Width (m)	Model 1a	Model 1b	6.9
	5.1	6.5	
Average Annual RPM	6.34	5.73	6.19

II. The WTGs for both Project Design Options will comprise three blades and a horizontal axis rotor. The blades will be connected to the hub, forming a rotor which turns a shaft connected either directly to the generator ('direct drive') or to a gearbox, which are located within the nacelle. Each WTG will be installed on a steel monopile foundation with a diameter ranging from 7 m to 11 m.

III. Two Offshore Substation Platforms (OSP) each comprising a topside structure with a main structure height of 53 m above LAT, an antennae height of 63 m above LAT, topside length of 46 m and topside width of 33.5 m, supported on a monopile foundation ranging from 7 m to 14 m in diameter. One OSP will be located in the north, and one will be located in the south of the Array Area. The OSP topside structure will contain switch gear, transformers, control equipment, auxiliary electrical equipment, cranes, batteries, generators, fire control systems, communication mast and other ancillary equipment.

IV. The monopile foundations for the WTGs and OSPs will consist of a hollow steel tubular piles installed into the seabed. WTG monopile foundations will be installed to a penetration depth ranging from 20 m to 37 m below Lowest Seabed Level (LSBL), while OSP monopile foundations will be installed to a penetration depth ranging from 20 m to 45 m below LSBL.

V. A network of inter-array cabling between WTG and OSP locations with a length of between 110 km and 122 km.

VI. Interconnector cabling between the two OSPs may be installed, with a length of between 25 km and 28 km.

VII. Two export cable circuits extending from the OSPs to the proposed Landfall at Johnstown North with a combined length of between 35 km and 40 km.

VIII. Associated ancillary works comprising cable protection and scour protection. Inter-array, interconnector and export cables will be buried where practicable; however where the target burial depth cannot be achieved external cable protection will be installed to prevent movement or exposure of the cables over the lifetime of the Proposed Development.Scour protection will be used to protect the monopile around the monopile foundation.

IX. Ancillary components to be mounted on the monopile foundations including boat landings, J-tubes, platforms and davit cranes to support the construction, operation and decommissioning of the infrastructure described above.

X. Confirmatory surveys comprising geotechnical, geophysical and environmental surveys.

XI. Project Design Options 1 and 2 have defined WTG and OSP layouts with a 100 m limit of deviation applying to each location to allow avoidance of site constraints such as difficult ground conditions during construction.

XII. This application is seeking a ten-year permission and 36.5 year operational life from the date of final commissioning of the Proposed Development.

5.10 Please refer to the Planning Drawings and Volume II, Chapter 4: Description of Development (Revised March 2026)' of the EIAR which accompany the Application for further information on the two Project Design Options, including details on layouts, elevations, general arrangements etc.

Need for, and Benefits of, the Proposed Development

5.11 Section 6 of this Planning Report identifies the strategic policy support at European, National, Regional and Local levels for the development of offshore renewable energy development in Ireland that will support the transition away from GHG emitting sources of energy and towards greener renewable energy. There is a critical yet unfulfilled need for offshore wind in Ireland and urgent action is required to meet Ireland's strategy of increasing renewable energy generation to supply 80% of demand, with at least 5GW of offshore wind required by 2030 to meet the goals of CAP25.

5.12 Six Maritime Area Consents (MACs) were granted by the Minister for the Environment, Climate and Communications, with a commencement date of 23rd December 2022, representing a potential opportunity for approximately 4.2GW of offshore wind generation capacity. These Phase 1 developments, which include the Proposed Development, are aiming to commence operation in the late 2020s subject to securing a planning permission. The Sceirde Rocks Offshore Wind Farm has since withdrawn its planning application (December 2025). However, development rights for the Tonn Nua offshore Wind Farm, has been provisionally awarded demonstrating the continued commitment of the Government to their strategy of increased offshore

wind energy generation. Therefore, the capacity of Ireland's offshore wind development pipeline, based on the current pipeline of identified proposed developments that have the benefit of a MAC, is not yet sufficient to meet the CAP25 target of at least 5GW of offshore wind by 2030. This means further offshore renewable energy development will need to come forward in order to achieve the CAP25 goals.

5.13 At an overarching national level, both the National Marine Planning Framework (NMPF) and the National Planning Framework (First Revision) (NPF) establish offshore renewable energy as a strategic national priority and a primary mechanism for achieving Ireland's legally binding climate change mitigation and decarbonisation obligations. The NMPF identifies offshore renewable energy as a key driver in meeting national climate targets and states that such development where it assists the State in meeting these objectives, applying a balanced assessment of environmental, social and economic considerations should be supported. In parallel, the NPF embeds climate action at the core of the planning system and supports the timely consent and delivery of renewable energy infrastructure of strategic importance, including offshore renewable energy developments, in order to ensure compliance with Ireland's statutory climate and energy obligations

5.14 The relevance of national climate obligations to planning decision-making has recently been clarified by the Irish Supreme Court in the *Coolglass Wind Farm* judgment (*Coolglass Wind Farm Limited v An Coimisiún Pleanála* [2026] IESC 5). The Court confirmed that under the Climate Action and Low Carbon Development Act 2015 (as amended) (The Climate Act) public bodies, including planning authorities, are required to perform their functions in a manner consistent with the State's statutory climate objectives and the approved Climate Action Plan. The judgment establishes that a decision-maker must actively consider statutory climate targets and policy when exercising their functions, and that departure from climate objectives is permissible only where there are genuine practical difficulties that make full alignment impracticable. The decision reinforces the importance of properly weighing legally binding decarbonisation objectives when determining applications for renewable energy infrastructure.

5.15 The Proposed Development will comprise an offshore wind farm with an export capacity of 800MW. Offshore wind is a proven technology and can be deployed with confidence, following a grant of planning permission. The construction programme for the Proposed Development has been optimised and is anticipated to be completed within a period of approximately four years. On this basis, the proposed development is expected to begin to export power to the Irish grid from 2030 and therefore will provide a significant contribution to the offshore wind sector in Ireland, to support both the 2030 Irish decarbonisation targets and delivery commitments, and Ireland's energy security of supply.

5.16 The Proposed Development would assist the state in delivering national climate and energy policy. As outlined in Volume II, Chapter 20 (Air Quality and Climate (Revised March 2026) of the EIAR, the annual carbon displacement or carbon savings attributable to the Proposed Development have been compared against the latest GHG emissions for 2023 and the projected annual emissions in 2030. The annual

carbon savings attributable to the Proposed Development is estimated to be equivalent to 1.65 - 2.15% of the projected national emissions in 2030 and 16.2 - 23.6% of the projected emissions that are required for the energy industries in 2030. In addition, based on its anticipated installed generating capacity, the Proposed Development has the potential to contribute approximately 16% of the CAP25 offshore wind capacity target for 2030.

Economic Benefits of the Proposed Development

5.17 An Socio Economic Impact Assessment and Supplementary Socio-Economic Analysis (RFI March 2026) is included at Appendix 21.1 and Appendix 21.2 of the EIAR Volume III and outlines the potential economic benefits of ABWP2 across three project stages: capital expenditure (CAPEX including development), operational expenditure (OPEX) and decommissioning (DECEX). It estimated that over the lifetime of the Project €4.9 billion will be spent across these three stages.

5.18 This investment in the ABWP2 project will deliver the following benefits to Ireland and the regional area of Counties Wicklow and Wexford:

- Create 1,720 annualised Full Time Equivalent (aFTE) jobs during the development and construction phase, 430 of which will be in the regional area.
- Employment that will generate €111 million Gross Value Added (GVA) for the Irish economy.
- Employment generating €25 million (GVA) for the regional economy.
- Generate €16 million for the Irish economy of which €11 million will benefit the regional economies during the operational phase of the development; and
- Generate over €500 million GVA over the 36.5 year operational lifespan of the development.

5.19 The ABWP2 project will also:

- Facilitate an increase in the use of renewable energy generation with the ABWP2 having a generation capacity of 800MW, which has the potential to power almost 850,000 homes and offset around 830 billion kilos of carbon emissions per annum.
- Provide security of supply for Ireland and lead to an increase in the production of domestic energy.
- Make a significant contribution on decarbonising energy and meeting Ireland and EU's binding energy targets.

5.20 The following factors also demonstrate the suitability of the ABWP2 project to deliver on decarbonisation targets, in the context of other identified and any future pipeline of offshore wind development opportunities. These attributes include:

- the suitability of the proposed location in relation to important environmental factors.
- the suitability of the grid connection options already identified.
- a 16% contribution to the target of 5GW offshore wind from the Proposed Development; and
- progress already made on development actions which increases the deliverability of the project i.e. the OGI and OMF already granted planning permissions.

Community Benefits of the Proposed Development

5.21 SSE has a long and proud history of sharing economic value from its renewable assets with communities. SSER owns and operates 29 onshore wind farms on the island of Ireland and to date has invested over €16m on a voluntary basis in the surrounding communities. SSER has direct experience of administering community benefit funds with a total lifetime value of €367m across Ireland and Great Britain.

5.22 SSE has been engaging with local communities near the proposed ABWP2 site since 2018, and to date, has invested over €500,000 on a voluntary basis across County Wicklow and North Wexford.

5.23 This investment has been made through two separate Sponsorship and Fisheries Funds. The Sponsorship Fund has supported more than 80 community initiatives under themes of marine-based activities, environmental and social sustainability and energy efficiency. The Fisheries Fund has sought to provide direct benefit to locally registered commercial fishery operators and in 2023, in collaboration with Wicklow County Council, delivered a new 16 berth commercial pontoon at Arklow Harbour.

5.24 SSER has committed to the continuation of these voluntary funds throughout the development phase in order to demonstrate its commitment to the local region and support for communities in the vicinity of the ABWP2 project.

5.25 ABWP2 was not successful in the first round of the Government's ORESS scheme, however, SPL remains fully committed to delivering the project, and, providing a community benefit fund. Without an ORESS support contract, ABWP2 is not in a position to deliver a community fund in line 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.

5.26 The ABWP2 Community Benefit Fund will be administered in line with SSER's 29 existing community benefit funds in Ireland and align with the fundamental principles of the ORESS community benefit guidelines, namely community participation and community-led decision-making.

5.27 In administering the community benefit fund for ABWP2, SSER will:

- Ensure community participation in fund decision-making via the establishment of a local Fund Committee;
- Develop a Funding Strategy and Development Delivery Plan which will be approved by the Fund Committee;
- Raise awareness and ensure effective promotion of the application process in line with the Funding Strategy;
- Ensure that applications for funding are assessed in a fair, non-discriminatory and transparent manner;
- Publish an annual report detailing the performance of the fund and ensure transparency;
- Maximise the impact of the fund by supporting communities to deliver their priorities with measurable and sustainable benefits;
- Ensuring that communities benefit from funding during the construction of ABWP2. Following Financial Investment Decision (FID), SSER will make prepayments available during the three years preceding Commercial Operations as follows:

  –1st Early Contribution Year - €0.5m

  –2nd Early Contribution Year - €1m

  –3rd Early Contribution Year - €1.5m

5.28 The early contribution payments would be offset at a rate of €0.5m per annum from the funds during subsequent years, or at an amount as agreed with the Fund Committee.

5.29 In the event ABWP2 does manage to secure a future government-backed subsidy arrangement or an alternate arrangement which provides additional support to the project, then the level of this fund would be reviewed and increased as appropriate in accordance with the ORESS community benefit guidelines.

6. Strategic Policy Context

Overview

6.1 This section of the Report provides an overview of the strategic European, national, regional and local polices/strategies/frameworks/plans which are relevant to renewable energy projects in Ireland. This section also describes European and national legislation that puts key renewable energy policy targets on statutory footing.

6.2 This Section demonstrates that there is a significant amount of strategic policy support for renewable energy projects, such as the Proposed Development, which is an important consideration in the assessment of the Application.

6.3 This section of the Report sets out the strategic policy context which is applicable to the Proposed Development, but does not provide a detailed assessment of the Proposed Development against each of these policies/strategies/frameworks/plans. The statutory planning policy context, along with an assessment of the Proposed Development against the relevant policies and objectives, is provided in the following sections of this Report:

- Section 7 - National Planning Policy
- Section 8 - Regional Planning Policy
- Section 9 - Local Planning Policy

European Context

European Green Deal (European Commission, 2019)

6.4 The European Green Deal, published by the European Commission in December 2019, sets out the European Union's overarching policy framework for achieving climate neutrality by 2050. The strategy outlines a roadmap for transitioning the EU towards a low-carbon, resource-efficient economy, including measures to reduce greenhouse gas emissions, increase the contribution of renewable energy, improve energy efficiency and integrate climate considerations across key sectors such as energy, transport and industry.

6.5 The Green Deal provides the strategic policy context for subsequent European climate and energy initiatives, including sector-specific strategies and revisions to EU energy legislation. In the energy sector it identifies the expansion of renewable electricity generation, including offshore wind, as an important component in decarbonising electricity supply and supporting Member States in meeting binding emissions reduction obligations established under EU law.

EU Offshore Renewables Energy Strategy 2020

6.6 To ensure that offshore renewable energy can help reach the EU's ambitious energy and climate targets for 2030 and 2050, the European Commission published a dedicated EU strategy on offshore renewable energy (COM/2020/741) on 19th

November 2020 which proposes ways to support the long-term sustainable development of this sector.

6.7 The strategy aims to increase offshore wind capacity to around 25 times its current level, and facilitate the commercialisation of new offshore renewable technologies, such as tidal, wave and floating solar energy. The EU strategy sees potential for a vast increase in the volume of electricity generated from offshore wind.

6.8 The Strategy sets targets for an installed capacity of at least 60 GW of offshore wind and 1 GW of ocean energy by 2030 rising to 300 GW and 40 GW, respectively, by 2050, as part of its much broader European Green Deal (December 2019) to decarbonise Europe's energy consumption.

6.9 The European Commission estimates that investment of nearly €800 billion is necessary between now and 2050 to meet its proposed objectives, with most of the investment anticipated to come from the private sector.

REPowerEU

6.10 On 18 May 2022, the European Commission presented its REPowerEU plan, which seeks to end both the EU's energy dependency on other countries, and to make further advances in tackling the climate crisis by transforming Europe’s energy systems. It seeks to do so by saving energy, diversifying energy supplies, and producing clean energy.

6.11 The plan recognises that wind energy, particularly offshore wind, represents a significant future opportunity for a green, secure EU energy system. It aims to strengthen the global competitiveness of the EU wind sector and to deliver the ambitions of REPowerEU through rapid deployment of wind energy. To achieve this, supply chains must be reinforced and permitting processes drastically accelerated, as outlined in Section 2.2.3. The plan therefore increased the EU’s headline 2030 renewable energy target from 42.5% to 45%.

2030 EU Climate and Energy Framework

6.12 The 2030 EU Climate and Energy Framework establishes the overarching policy framework for climate and energy action in Europe and is supported by the Fit for 55 legislative packages under the European Green Deal (European Commission, 2019). The framework seeks to achieve at least a 55% reduction in EU greenhouse gas (GHG) emissions from 1990 levels, alongside an increased contribution from renewable energy sources.

6.13 The Renewable Energy Directive (EU) 2018/2001 initially established an EU-wide renewable energy target of at least 32%. This target was strengthened through the adoption of the revised Renewable Energy Directive (RED III) in late 2023, increasing the binding EU renewable energy target to at least 42.5% by 2030, with an ambition to reach 45%.

6.14 The Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999 provides the framework for implementing and monitoring progress towards the EU’s 2030 climate and energy targets.

6.15 In line with this Regulation, Ireland prepared its National Energy and Climate Plan (NECP) 2021–2030, which is currently being supplemented by additional policies and measures to reflect updated EU climate ambitions.

National Context

Climate Action and Low Carbon Development (amendment) Act 2021

6.16 In July 2021, Ireland enacted an amendment to the Climate Action and Low Carbon Development Act 2015, this was amended in 2021 by the Climate Action and Low Carbon Development (amendment) Act 2021. The Climate Act binds Ireland to achieve net zero emissions by 2050 and commits to achieving 51% reduction in GHG emissions by 2030.

6.17 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.

Future Framework for Offshore Renewable Energy – Policy Statement 2024

6.18 The Future Framework for Offshore Renewable Energy is an overarching Framework for long term delivery of ORE, identifying key actions and future directions that will be addressed through subsequent policy to develop and initiate a long term, plan-led approach to the ORE future in Ireland.

6.19 It reiterates the ambitious targets of at least 5GW of ORE by 2030, approximately 20GW by 2040 and at least 37GW in total by 2050.

Climate Action Plan 2025

6.20 The Climate Action Plan 2025 (CAP25) is Ireland's most recent Climate Action Plan prepared under the Climate Act. It is integral to the National Development Plan 2021-2030 and sets out how Ireland can accelerate the actions required to respond to the climate crisis, putting climate solutions at the centre of Ireland's social and economic development.

6.21 Ireland's statutory climate objective remains 51% reduction in emissions by 2030 (relative to the 2018 Levels) and climate neutrality by no later than 2050 in accordance with the Climate ActCAP25 forms part of the annual programme of measures required to deliver Ireland's carbon budgets and sectoral emission ceilings.

6.22 CAP25 was approved in April 2025 and represents the third prepared under the 2021 Act. It builds on the actions set out in previous plans including CAP23 and CAP24 and focuses on accelerating delivery in advance of Ireland's second carbon budget period (2026-2030). CAP25 is accompanied by a detailed Annex of Actions which assigns delivery responsibilities and timelines across all sectors to support compliance with Ireland's carbon budgets.

6.23 CAP25 continues to identify the electricity sector as central to emissions reduction and recognises the critical role of renewable energy, including offshore renewable energy, in decarbonising the electricity system and supporting wider economy-wide electrification. The plan confirms the continued role of the Offshore Wind Delivery Taskforce, established in CAP23, to oversee and coordinate the system-wide actions required to develop offshore wind generation in Ireland.

6.24 Chapter 11 of CAP25 sets out actions and milestones for renewable electricity generation across solar, onshore and offshore wind. It maintains the Government's objective of delivering at least 5GW of offshore wind capacity by 2030, alongside the overall target of supplying 80% of electricity demand from renewable sources by 2030, supported by continued expansion of renewable generation, reinforcement of the electricity grid, and delivery of offshore transmission and network infrastructure.

6.25 CAP25 reiterates that Ireland has a substantial offshore renewable energy resource, with offshore renewable energy identified as a key enabler of Ireland's, long term decarbonisation objectives and energy security, emphasising CAP24's offshore renewable opportunity estimate of 37GW. The Department of the Environment, Climate and Communications (DECC) commit to updating the plan every 12 months in a manner that is underpinned by consultation with key stakeholders.

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

Ireland's National Energy and Climate Plan 2021-2030

6.27 Ireland's National Energy and Climate Plan (NECP) pledges to increase electricity generated from renewable sources to 70%, of which there will be at least 3.5GW of offshore renewable energy. This has been revised upwards since the adoption of the plan in 2020 to 5 GW of offshore renewable energy.

6.28 The NECP also supports the target of a 30% reduction in non-ETS greenhouse gas emissions by 2030 (from 2005 levels).

6.29 The NECP recognises that Ireland has one of the best offshore renewable energy resources in the world with a sea area of 900,000 square kilometres. Achieving the goals to decarbonise electricity will require significant investment, to build out relevant infrastructures and to expand capacity to integrate new renewable technologies such as offshore wind energy.

6.30 The NECP includes the assumption that the deployment of offshore wind capacity will grow from 2025 onwards, in line with assumptions from Ireland's 2019 Climate Action Plan, highlighting an urgent impetus to develop offshore wind energy to meet its climate targets.

Policy Statement on Security of Electricity Supply 2021

6.31 The Policy Statement on Security of Electricity Supply advises that '*Electricity is vital for the proper functioning of society and the economy*.'

6.32 Noting this, the Policy Statement confirms that '*Ensuring continued security of electricity supply is considered a priority at national level and within the overarching EU policy framework in which the electricity market operates.*'

6.33 The Policy Statement sets out a number of updates to national policy in the context of the Programme for Government 2020 commitments relevant to the electricity sector, planning authorities and developers.

6.34 It also recognises that the majority of renewable energy generated by 2030 will be from wind and solar.

Project Ireland 2040: National Development Plan 2021-2030

6.35 The Project Ireland 2040: National Development Plan 2021-2030 (NDP) identifies strategic priorities for public capital investment in order to underpin the implementation of the NPF.

6.36 The NDP identifies strategic priorities for public capital investment in line with the NPF. It is a strategic priority of the NDP to have a new Renewable Electricity Support Scheme. A strategic investment priority in renewable energy is for regular Renewable Electricity Support Scheme (RESS) auctions, which have delivered competitive levels of onshore wind and solar electricity generation which indicatively could be up to 2.5 GW of grid-scale solar and up to 8 GW of onshore wind by 2030. The RESS is also committed to financially supporting the delivery of up to 5 GW of additional offshore renewable electricity generation by 2030.

6.37 The NDP commits to increasing the share of renewable electricity up to 80% by 2030. This is an unprecedented commitment to the decarbonisation of electricity supplies. In the unprecedented scale of development in the renewable sector, the NDP recognises the contribution of the private sector to support the ambitions of the Government.

Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System 2021

6.38 The DECC developed a framework and associated policy for Ireland's future offshore electricity transmission system, which was approved by Government on 14th April 2021.

6.39 The new offshore transmission system policy approved by Government includes a phased transition from current decentralised offshore transmission system mode to a centralised one. This transition will be made up of three stages as follows:

- ***Phase One – Decentralised Stage Grid Development (2021-2024)****: The successful projects in the first offshore RESS auction will develop the associated offshore transmission system requirement.*

- ***Phase Two – Transition Stage Grid Development (2025-2030)****: Participants in the second RESS auction, including projects unsuccessful in the first auction, may continue to plan, build and transfer transmission assets during the Second Phase as per the First Phase. The planning and development of the offshore transmission system from the second RESS auction may be carried out by either renewable energy projects or EirGrid.*

- ***Phase three – Enduring Centralised Grid Development (2030 onwards)****: To correspond with the third RESS auction, the offshore transmission system will be exclusively developed by EirGrid, with maritime areas in which renewables development may take place to be provided for by the second Offshore Renewable Energy Development Plan (OREDP II).*

Programme for Government 2025, Securing Ireland's Future

6.40 The Programme for Government, Securing Ireland's Future (PfG) outlines the government's goals and policies during its term in power. Under the PfG, Ireland is committed to "Leading a Revolution in Renewable Energy"

6.41 The Government is committed to achieving 80% of Ireland's electricity generation from renewable sources by 2030. The Government will deliver at least 5GW of offshore wind by 2030 and has identified a range of actions to support the acceleration of renewables which include; a fast track for offshore wind development through prioritisation of the publication of Designated Maritime Area Plans and ensure relevant agencies are sufficiently resourced to accelerate these developments; and utilise the new Planning and Development Act 2024 to fast-track developments.

Offshore Renewable Energy Development Plan I and II

6.42 Published in 2014, and reviewed in 2018, Ireland's first Offshore Renewable Energy Development Plan (OREDP) provided a framework for the sustainable development of Ireland's Offshore Renewable Energy (ORE) resources, setting out key principles, policy actions and enablers for delivery of Ireland's significant potential in this area.

6.43 The OREDP I is 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.

6.44 The OREDP was subject to SEA and Appropriate Assessment (AA)and for the purposes of the Plan, the marine area was assessed by way of six Assessment Areas. Within the SEA, the development potential for fixed wind development in Assessment Area 2 for the East Coast South Area (where the Proposed Development is located) that could be accommodated without likely significant adverse effects on the environment was found to range between 3000 and 3300 MW (Department of Communications, Energy and Natural Resources, 2014, SEA, Table 2.7).

6.45 This range took into account the offshore wind developments in Irish waters that had then been approved by means of the foreshore consenting process including Arklow Bank Windfarm (520 MW) as well as other projects such as Codling Bank (approximately 1,100 MW) and the proposed Dublin Array offshore wind farm (approximately 214 MW).

6.46 The Proposed Development is located on the same site as the previously consented Arklow Bank Windfarm although the current iteration of the Proposed Development proposes significantly less numbers of WTGs and a greater output capacity on the site. The advances in technology which have enabled this reduction in numbers of WTGs and an increase in output capacity would suggest that the East Coast South Area could potentially accommodate more fixed wind development without likely adverse effects on the environment than the SEA previously concluded.

6.47 DECC has commenced work to update the OREDP I with a second plan, OREDP II. Consultation was undertaken by DECC on the draft OREDP II between 24 February 2023 to 20 April 2023 and responses are currently being considered.

6.48 The OREDP II assessment encompasses the maritime area covering all of Ireland's Exclusive Economic Zone (EEZ), which reaches up to 200 nautical miles or 370 km off the coast. The plan will consider advances in technology to assess the ORE potential in Irish waters. It will seek to map areas most suitable for ORE using the latest data available on a range of themes including other maritime activities and marine biodiversity.

6.49 The OREDP II will assist in delivering the Programme for Government commitment to develop a long-term plan to take advantage of a potential of at least 30GW of floating wind off the Atlantic coast and become a major contributor to a pan-European renewable energy generation and transmission system.

6.50 The goals of the OREDP II include quantifying the offshore renewable energy potential in Ireland's maritime area, facilitating the identification of candidate areas for future offshore renewable development and prioritising data gaps to be addressed. The OREDP II, in tandem with a planned economic analysis, will set out the pathway for the deployment of offshore renewable energy in the Enduring Regime beyond 2030.

The White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030

6.51 The White Paper recognises that Ireland's sea area is around ten times the size of its landmass and the country has one of the best offshore renewable energy resources in the world. Ireland's geography offers significant potential for offshore wind, wave and tidal energy.

6.52 The plan cites the Offshore Renewable Energy Development Plan (OREDP), which provides a framework for the sustainable development of the offshore wind. It notes that exchequer support for ocean research, development and demonstration is being increased under the OREDP. It states that offshore wind has been effectively used in other EU Member States and can yield a higher relative energy output than onshore wind due to scale. It also recognises the potential for Ireland's offshore resource to be a potential export opportunity.

The Marine Planning Policy Statement (MPPS) 2019

6.53 Ireland's first Marine Planning Policy Statement (MPPS) provides for the preparation, adoption and review of the statutory marine planning policy statements. Broadly the MPPS sets out the overarching policies and principles the Government expects marine planning bodies and other Public Bodies that engage with the marine planning system to observe. The MPPS sets out high level priorities for the enhancement of the marine planning system.

The MPPS recognises that the '*construction of wind turbines and associated development*' is one of many development types within the foreshore development management. One of the overarching principles and high-level priorities outlined in the MPPS is as follows:

"Marine planning will facilitate Ireland's transition to a low carbon and climate resilient economy. Marine planning should ensure that developments in the marine environment consider as a matter of course ways to reduce the emission of greenhouse gases and also that they have due regard to the impacts of a changing climate. Marine planning should also support the realisation of relevant measures contained in the Government Plan to Tackle Climate Breakdown."

Future Framework for Offshore Renewable Energy 2025 Review

6.54 The Future Framework for Offshore Renewable Energy – 2025 Review, published in May 2025 by the Department of the Environment, Climate and Communications, provides an update on progress in the offshore renewable energy sector since publication of the Future Framework Policy Statement in 2024. The review confirms Government's continued commitment to a plan-led approach for future offshore renewable energy development and to achieving Ireland's long-term offshore renewable energy targets.

6.55 The 2025 Review reports on progress against the 29 actions set out in the Future Framework and presents an updated action plan and a series of ongoing commitments for the period 2025–2026. The review confirms that a number of actions have transitioned to ongoing commitments, reflecting their continued relevance to the delivery of offshore renewable energy projects.

6.56 Of direct relevance to the proposed development is Action 9, which is retained as an ongoing commitment and provides for continued State support for the consenting and planning of offshore renewable energy projects, including the progression of necessary environmental assessment and regulatory procedures. This commitment underscores Government policy support for the timely and coordinated consenting of offshore renewable energy developments in accordance with legislative and environmental requirements.

Regional

Mid-East Regional Enterprise Plan to 2024

6.57 This Regional Enterprise Plan to 2024 for the Mid-East (REP) which includes Kildare, Wicklow and Meath County Councils, is centred around a number of strategic objectives, including Strategic Objective 4 to 'Ensure that the Mid-East Region accelerates the transition to a low carbon economy'.

6.58 In relation to the Strategic Objective 4, the Plan notes that offshore wind energy is at the heart of the National Climate Action Plan's ambition to cut GHG emissions in the electricity sector by two-thirds and increase the renewable energy share of electricity demand to 70 per cent by 2030 from its current 35 per cent. The REP recognises the potential of the offshore wind farms along the east coast of Ireland that are currently in development to achieve the aims of national policy.

6.59 Action 4.3 of Strategic Objective 4 seeks '*…the establishment of Marine Enterprise Facilities in the Mid-East.'* As part of the rationale, the following is noted:

*'The **harbours at Wicklow and Arklow are well positioned to service the offshore wind industry** and other marine services such as aquaculture. **The creation of Marine Enterprise Hubs at Arklow and Wicklow harbours will provide services to the offshore renewable energy industry** as well as to fishing, and to the expanding aquaculture sector. There are opportunities to foster new marine related enterprise in a value-added product. There is significant potential to repurpose underused quayside properties as marine enterprise spaces offering many benefits and opportunities including **driving innovation and improvements in the operation and maintenance of offshore wind**, identifying opportunities to maximise the economic impact of investment in the renewable energy sector…'* **[our emphasis]**

6.60 Action 4.4 of the REP is also of relevance which provides for 'The establishment of a Marine Education and Training facility for the Mid-East' and states:

'Experts advise that there is the potential for 2,532 direct jobs in offshore renewable energy in Ireland to be created during the development & construction of 3.5GW of offshore wind with the majority of these jobs created between 2025 and 2030. It is likely that the majority of the pre 2030 jobs will be created off the East Coast between Louth and Wexford. A number of projects are at advanced stages of planning off the County Wicklow Coast. In addition to the Arklow Bank Ireland's first offshore wind farm, there are four projects (out of a total of seven nationally) off the County Wicklow Coast which have been declared to be "Relevant Projects". Developers of Relevant Projects will have priority over earlier stage projects in accessing the planning process for those Relevant Projects when the new offshore consenting regime is in place.'

South-East Regional Enterprise Plan to 2024

6.61 The South-East Regional Enterprise Plan to 2024 (SEREP) was launched by the Department of Enterprise, Trade and Employment in Wexford on the 24 March 2022. The Plan includes projects and initiatives across the four South-East counties (Carlow, Kilkenny, Waterford and Wexford).

6.62 The Plan contains 5 key strategic objectives with discrete actions developed for each. Strategic Objective 2 - Green Growth is of particular note and the Plan states that *'The South-East Region is determined to play its part in working to reduce greenhouse gas emissions and to tackle climate change*'.

6.63 The Plan is seeking to '*Establish the South-East Region as the #1 region for fixed bed Offshore Renewable Energy*'. Indeed, the Plan identifies a specific action to help achieve this objective - '*Action 2.1 - Position the South-East as an Offshore and Onshore Wind Energy Hub*'.

6.64 The Plan notes that the South-East region has the necessary ingredients to become a hub for green enterprise as the region has access to key natural resources in wind and sun, and has an existing industry base and skills pipeline that aligns to the new green economy.

Local

Wicklow County Council Climate Change Adaptation Strategy (2019)

6.65 This strategy demonstrates that Wicklow County Council is fully committed to tackling climate change to contribute to national and regional climate action objectives.

6.66 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. 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.'*

Wicklow Climate Action Plan 2024-2029

6.67 The Wicklow Climate Action Plan (WCAP) sets out commitments to address climate change in line with statutory obligations, guided by the Climate Act 2021 and the National Climate Action Plan 2023.

6.68 The overarching goal of the WCAP is to transition to a climate-resilient, biodiverse, sustainable, and carbon-neutral County by 2050. The plan within the WCAP aligns with the national climate objective, which targets a climate-neutral economy by 2050.

6.69 The WCAP contains eight 'Strategic Goals' which establish a structured approach to the arrangement of climate actions to be addressed. The eight goals are based on the objectives of 'Delivering Effective Climate Action 2030' and the following are relevant with respect to the Proposed Development:

- *'Adopt climate focused governance, provide leadership and build partnerships for climate action.*
- *Achieve carbon emissions reduction of 51% and energy efficiency improvement of 50% in our operations by 2030, creating a pathway to net zero by 2050.*
- *Mobilise climate action in enterprise and agriculture, supporting the transition to an inclusive, net zero and circular economy.*
- *Test the scope and scale of decarbonisation in Arklow with the aim of creating a vibrant town which has low carbon living at its core."*

6.70 The WCAP identifies three major infrastructure projects for Arklow including the development of the Arklow Bank Wind Park.

6.71 Section 5.4 of the WCAP advises that '*There are 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*.' The first key goal directly references the development of offshore wind energy as follows:

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

Wexford County Council Climate Action Plan 2024-2029

6.72 The Wexford County Council Climate Action Plan 2024-2029 (WXCAP) sets out how Wexford County Council will be responsible for enhancing climate resilience, increasing energy efficiency, and reducing greenhouse gas emissions, across the County. The mission statement of the WXCAP is "*to transition County Wexford to a Climate Resilient, Biodiversity Rich, Environmentally Sustainable and Climate Neutral Economy."*

6.73 With respect to offshore wind energy projects the WXCAP states:

'The offshore wind industry offers strong commercial possibilities for the port [Rosslare] and county in general. It will also provide much needed infrastructure to enable Ireland to reach its renewable energy targets into the future. (Local Economic and Community Plan 2023 -2029).

7. National Planning Policy

Overview

7.1 This section of the Report outlines, and assesses the Proposed Development against, the relevant national planning policy context, which includes:

- National Planning Framework: First Revision; and
- Project Ireland 2040: National Marine Planning Framework.

7.2 This Section of the Report also outlines the relevant Government planning guidelines which are applicable to the Proposed Development, including:

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessments (2018).
- Appropriate Assessment of Plans & Projects in Ireland - Guidance for Planning Authorities (2010); and
- Framework and Principles for the Protection of the Archaeological Heritage (1999).

National Planning Framework, First Revision (April 2025)

7.3 The National Planning Framework (NPF) was originally published in February 2018. The NPF has been updated and superseded by the NPF First Revision (April 2025), which now provides the current national planning policy position. The First Revision strengthens national planning priorities in respect of climate action, renewable energy and sustainable marine development.

7.4 As a strategic development framework, the NPF sets the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

7.5 The NPF is underpinned by supporting policies and actions at sectoral, regional and local levels. The NPF also establishes the policy context for the Regional Spatial and Economic Strategies (RSES) and local level Development Plans.

7.6 The NPF contains 10 National Strategic Outcomes (NSOs) and 10 subsequent Strategic Investment Priorities (SIP) to deliver the National Development Plan. 'NSO 8 - Transition to a Carbon Neutral and Climate Resilient Society' and 'SIP 8 – Climate Action' are relevant to the Proposed Development.

7.7 NSO 8, has been revised since the NPF to embed the legally binding climate objections placing a greater emphasis on achieving climate neutrality. NSO 8 is of particular relevance to the Proposed Development and is reproduced below:

'*The Climate Action and Low Carbon Development (Amendment) Act was enacted in 2021 with a commitment to a legally binding target to reduce greenhouse gas emissions by 51% and increase the share of electricity generated from renewable sources to 80% over the decade (2021 – 2030), and to achieve net-zero emissions no later than 2050.*

This objective will shape investment choices over the coming decades in line with the National Climate Action Plan 2024 and the National Adaptation Framework. New energy systems and transmission grids will be necessary for a more distributed, renewables-focused energy generation system, harnessing both the considerable on-shore and off-shore potential from energy sources such as wind ,wave and solar and connecting the richest sources of that energy to the major sources of demand.

7.8 Under NSO 8, the NPF identifies a number of 'Green Energy' priorities reflecting Ireland's statutory climate obligations and the need to respond to the impacts of climate change. As noted above, the NPF through NSO 8 supports the delivery of **80% of Ireland's electricity needs from renewable sources by 2030**, **a 51% reduction in greenhouse gas emissions by 2030 and the achievement of net zero emissions by no later than 2050**. [**Our emphasis**]

7.9 NSO 8 acknowledges that the accelerated delivery of renewable electricity generation is essential to meeting these targets, supporting the electrification of other sectors, and improving energy security by reducing reliance on import fossil fuels. It also identifies the need for new energy systems and reinforcement of distribution and transmission networks to enable a more distributed, renewables-focused energy system, harnessing both onshore and offshore renewable resources and efficiently connecting generation to major sources of demand.

7.10 The NPF does not specifically reference the Application Site or the Proposed Development, however, Section 7 of the NPF, entitled 'Realising our Island and Marine Potential' relates to maritime planning and development in the marine environment, including offshore renewable energy.

7.11 The NPF recognises the fundamental importance of the marine environment to Ireland's development and states that: '*Our marine environment is a national asset that yields a wide range of commercial and societal benefits through activities such as commercial fishing, transport, tourism, recreation, **renewable energy**, wastewater discharges and cultural heritage, as well as playing a vital role in supporting marine life and biodiversity more generally*. [**our emphasis**]

7.12 Section 7 of the NPF recognises that land use planning and maritime planning processes will work alongside each other, including working with other national administrations, such as Northern Ireland, regarding transboundary issues to ensure a consistent and effective policy and regulatory approach to marine and terrestrial planning. Indeed, on page 97 of the NPF states:

'Sustainable utilisation of Ireland's marine resources, will be influenced to a significant degree by how successfully we can align long-term spatial planning for our terrestrial and marine areas through the National Planning Framework and Ireland's National Marine Spatial Plan.'

'The planning system plays an important role in permitting the infrastructure necessary to capture, store and transmit such energy to consumers, and in doing so, enable Ireland to utilise its vast and sustainable offshore wind and other energy resources. *Offshore renewable energy production can also offer the potential to attract new green industries with high-energy needs to those locations* ***[Our Emphasis]'***

7.13 The NPF acknowledges that, over the period to 2040, technological advances, particularly in offshore renewable energy, are expected to accelerate the commercial application, development and deployment of the marine renewable energy sector, supporting Ireland in meeting its statutory climate and energy commitments.

7.14 Section 7.5 of the NPF, entitled 'Offshore Renewable Energy', recognises that '*Offshore renewable energy represents an emerging sectoral opportunity for coastal regions with the potential to support the* ***delivery of Ireland's offshore wind ambitions being a particular economic development opportunity.'*** [**Our Emphasis**].

7.15 The NPF links national planning policy with the National Marine Planning Framework and recognises that offshore renewable energy developments are major capital infrastructure projects with inherently long lead-in times. It confirms that such developments are now progressed within a plan-led marine planning framework under the National Marine Planning Framework and the Maritime Area Planning Act 2021, under which the Proposed Development is being advanced.

7.16 The NPF contains a number of National Policy Objectives (NPOs) which are relevant to the Proposed Development, including:

- *National Policy Objective 48 –* ***Regional, Metropolitan and Local Development Plans will take account of*** *and integrate relevant maritime spatial planning issues [****our emphasis****].*

- ***National Policy Objective 49*** *– Support the sustainable growth and development of the maritime economy and continue to invest in the seafood sector and our Fishery Harbour Centres, particularly in remote rural coastal communities and islands.*

- ***National Policy Objective 52*** *– Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.*

- ***National Policy Objective 55*** *–* ***To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and off-shore infrastructure*** *including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects. [****our*** *emphasis]*

- ***National Policy Objective 56*** *– Work with the relevant Departments in Northern Ireland for mutual advantage in areas such as spatial planning, economic development and promotion of the all-island economy, co-ordination of social and physical infrastructure provision and environmental protection and management.*

- ***National Policy Objective 57*** *- In co-operation with relevant Departments, Regional Assemblies and Local Authorities in Northern Ireland, ensuring effective management of shared landscapes, heritage, water catchments, habitats, species and trans-boundary issues in relation to environmental policy.*

- ***National Policy Objective 66*** *- The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.*

- ***National Planning Objective 69*** *– Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.*

- ***National Policy Objective 70*** *- 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 71*** *- Support the development and upgrading of the national electricity grid infrastructure, including supporting the delivery of renewable electricity generating development.*

- ***National Policy Objective 72*** *– Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.*

- ***National Policy Objective 73*** *– Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.*

- ***National Policy Objective 75*** *– Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plan.*

- ***National Policy Objective 85*** *- In line with National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:*

    – Integrating policies and objectives for the protection and restoration of biodiversity, including the principles of the mitigation hierarchy of – avoid, minimise, restore and offset – of potential impacts, in statutory land use plans.

    – Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in

the interest of ensuring continuity of habitat provision and reduction of associated risks and costs.

- ***National Policy Objective 87*** *- Enhance the conservation status and improve the management of protected areas and protected species by:*

  – *Implementing relevant EU Directives to protect Ireland's environment and wildlife and support the objectives of the National Biodiversity Action Plan;*

  – *Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans.*

  – *Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites.*

  – *Continued research, survey programmes and monitoring of habitats and species.*

- ***National Policy Objective 89*** *– Protect, conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance..*

- ***National Policy Objective 107*** *– Continue* ***to ensure the alignment of the National Planning Framework and the National Development Plan*** *through delivery of the National Strategic Outcomes* ***[our emphasis****]*

7.17 The Proposed Development has been carefully sited and designed, and supports the national ambitions and objectives of:

- transitioning to a competitive, carbon neutral, climate resilient and environmentally sustainable economy.
- ensuring a more distributed, renewables-focused energy generation system.
- harnessing the considerable off-shore potential from energy sources such as wind.
- increasing the quantum of our electricity needs from renewable sources.
- increasing renewable deployment to directly contribute to the agreed statutory EU and Ireland climate targets.
- progressively developing Ireland's offshore renewable energy potential; and
- strengthening Ireland's energy security and resilience.

7.18 Pre-application consultation has been undertaken with relevant prescribed and transboundary bodies for the Proposed Development. Further consultation was undertaken in response to the RfI and is outlined at Section 3.13 of this Report.

National Marine Planning Policy Framework

7.19 The National Marine Planning Framework (NMPF) was published by the Department of Housing, Local Government and Heritage on the 30th the June 2021 and is intended to represent the marine equivalent to the National Planning Framework.

7.20 The Framework adopts an ecosystem-based approach and brings together all marine-based human activities for the first time, outlining the government's vision, objectives and marine planning policies for each marine activity.

7.21 It also details how these marine activities will interact with each other in an ocean space that is under increasing spatial pressure, ensuring the sustainable use of our marine resources to 2040.

7.22 The NMPF creates the overarching framework for decision making that is consistent, evidence-based and secures a sustainable future for the maritime area and all applications for activity or development in Ireland's maritime area will be considered in terms of their consistency with its objectives.

7.23 The importance of the marine environment for Ireland is highlighted by the NMPF, as follows:

> *'As an island nation with sovereign rights over one of the largest sea areas in Europe, Ireland's economy, culture and society is inextricably linked to the sea. Our marine environment is a national asset that yields multiple commercial and non-commercial benefits from sectors such as seafood, tourism, recreation, renewable energy, cultural heritage, and biodiversity'.*

7.24 Noting the importance of the marine environment, Chapter 4 of the NMPF sets out the 'Overarching Marine Planning Policies' (OMPPs) which will ensure the sustainable management and use of Ireland's marine environment and which '…*apply to all proposals capable of having impacts in the maritime area*'.

7.25 The OMPPs are grouped according to 'Environmental – Ocean Health' (Chapter 5), Economic – Thriving Maritime Economy' (Chapter 6) and 'Social – Engagement with the Sea' (Chapter 7). The OMPPs are supplemented by, and should be read in conjunction with, the Sectoral Marine Planning Policies (SMPPs) in the sector specific chapters of the NMPF (i.e. Chapters 8 to 24).

7.26 Chapter 13 of the NMPF entitled 'Energy – Offshore Renewable' is the sector specific chapter relevant to the Proposed Development. Chapter 13 advises that '*A secure, sustainable and affordable supply of energy is of central importance to Ireland's economic and social wellbeing*' and notes that '*Ireland has some of the best offshore renewable energy resources in the world.*'

7.27 Chapter 13 also confirms that '*The initial focus for ORE* [Offshore Renewable Energy] *will be in developing wind in the shallower waters off Ireland's eastern and southern coasts, in line with current technology maturity and our target of achieving 5GW of capacity in offshore wind by 2030*'.

7.28 A detailed assessment of the Proposed Development against the NMPF's OMPPs and relevant SMPPs, including ORE 1 to ORE 11 of Chapter 13 'Energy – Offshore Renewable', has been undertaken by GoBe Consultants as part of the Environmental Impact Assessment Report and is reproduced at Annex **1** of this Report. The detailed assessment demonstrates that there is overall compliance between the Proposed Development and the relevant objectives and policies of the NMPF. In the very limited instances, where significant environmental effects have been identified, including those identified in the SLVIA, and where it has not been possible to implement the hierarchy of mitigation provided for in objectives and policies, the need for and benefits of the Proposed Development, set out in section 5.6 of this Report, support the reasons for proceeding. Further information in this regard is also provided in response to RFI Item 14 (a). Please refer to **Annex 1** for further details.

7.29 In particular, it is noted that the Proposed Development will align with/make a positive contribution to the following 'Energy – Offshore Renewable' objectives of the NMPF and the relevant offshore renewable energy policies, including ORE Policy 1 and ORE Policy 2 as set out in Annex 1 and summarised below:

- *Support the development of ORE in Ireland as a driver to significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with national and EU policy.*

- *Increase the sustainable ORE use of our extensive marine resource in an efficient and co-ordinated manner identifying, where possible, potential for synergies and opportunities for multi-use of our shared maritime area.*

- *Support Ireland's decarbonisation journey through increased use of ORE while delivering significant and sustained benefits, import substitution, fiscal return, national and local economic development and technology learning.*

- *Support the strategic growth of the ORE industry recognising the potential to derive benefits particularly for Ireland's coastal communities.*

- *Provide enhanced security of energy supply for Ireland in the short and medium term, in accordance with the Climate Action Plan.*

- *Ensure good regulatory practices in ORE installation and generation, including decommissioning of existing facilities, at end of life, according to international best practice.*

National Planning Guidelines

Marine Planning Guidelines

7.30 Section 7 of the Maritime Area Planning Act 2021 (as amended) advises that the Minister may at any time, prepare and issue marine planning guidance to public bodies regarding their functions under this Act and public bodies shall have regard to those guidelines in the performance of their respective functions.

7.31 At the time of writing this Report, the Minister has not issued any specific national marine planning guidelines. Notwithstanding, the Proposed Development has been sited

and designed, and the plans and particulars accompanying the Application have been prepared, in accordance with all relevant and prevailing legislative, policy, guideline and best practice requirements.

Guidelines for Planning Authorities and An Bord Pleanála on Carrying Out Environmental Impact Assessments (2018)

7.32 These Guidelines were issued by the Department of Housing, Planning and Local Government to planning authorities and ABP and both are required to have regard to the Guidelines in the performance of their functions under the Act.

7.33 The purpose of the Guidelines is to '…*provide practical guidance for planning authorities and the Board (Competent authorities) on legal and procedural issues and matters of interpretation arising from the amended Directive* [Directive 2014/52/EU]*, which should result in greater consistency in procedures adopted by competent authorities in the planning system*'.

7.34 The Guidelines, for the greater part, address key areas of change introduced by Directive 2014/52/EU and contain an outline and guide to sections 171A and sections 172, 172A, 172B, and 172C of the Act, arising from the transposition of the Directive.

7.35 The Guidelines aim to ensure compliance with the highest international standards in relation to taking environmental factors into account when determining development proposals and ensuring that environmental considerations are fully addressed as part of the planning process, as well as properly managed thereafter.

7.36 In accordance with the Guidelines, an Environmental Impact Assessment Report (EIAR) has been prepared in respect of the Proposed Development and is submitted with the Application.

Appropriate Assessment of Plans & Projects in Ireland - Guidance for Planning Authorities (2010)

7.37 This Guidance document was published by the Department of Environment, Heritage and Local Government (DEHLG) to guide compliance with the Birds Directive, 1979 (Council Directive 79/409/EEC) and the Habitats Directive, 1992 (Council Directive 92/43/EEC).

7.38 It preceded, but anticipated, the legislation which now transposes the Birds and Habitats Directives in Ireland, i.e. the European Communities (Birds and Natural Habitats) Regulations 2011, and parallel provisions relating to Appropriate Assessment in planning legislation (i.e. Part XAB of the Act and associated Regulations).

7.39 This guidance is intended to assist and guide planning authorities in the application of Article 6(3) and 6(4) of the Habitats Directive as it relates to their roles, functions and responsibilities in undertaking Appropriate Assessment of plans and projects. It applies to plans and projects for which public authorities receive an application for consent, and to plans or projects which a public authority wishes to undertake or adopt.

7.40 It sets out the different steps and stages that are needed in establishing whether a plan or project can be implemented without adversely affecting the integrity of a Natura 2000 site. The guidance also addresses issues of mitigation and avoidance of impacts,

and also the Article 6(4) derogation provisions for circumstances in which there are no alternatives and for which there are imperative reasons of overriding public interest (IROPI) requiring a plan or project to proceed.

7.41 In accordance with the Guidance, a Natura Impact Statement (NIS) has been prepared in respect of the Proposed Development and is submitted with the Application.

Framework and Principles for the Protection of the Archaeological Heritage (1999)

7.42 This document was published by the Minister for Arts, Heritage, Gaeltacht and the Islands to help further the implementation of the Valletta Convention in Ireland.

7.43 It sets out basic principles of national policy on the protection of the archaeological heritage and seeks to avoid conflict between the protection of the archaeological heritage and the Proposed Development.

7.44 The document explains that '*Archaeological sites and monuments vary greatly in form and date, examples include earthworks of different types and periods (e.g. Early Historic ringforts, prehistoric burial mounds), megalithic tombs from the Prehistoric period, medieval buildings, urban archaeological deposits and underwater features such as wrecks*'.

7.45 Part III of the document sets out principles for the protection of archaeological heritage, which include:

- *Archaeological heritage is non-renewable resource requiring careful and responsible management. The gathering of archaeological information should not destroy any more of that heritage than is necessary.*
- *There should always be a presumption in favour of avoidance of developmental impacts on the archaeological heritage and preservation in-situ of archaeological sites and monuments must be presumed to be the preferred option.*
- *If archaeological sites or monuments have to be removed due to development, then it is essential that the approach of preservation by record be applied.*
- *Carrying out of archaeological assessment is the first step in ensuring that preservation in-situ and preservation by record take place. Archaeological monitoring is another method of ensuring this occurs.*
- *Issues arise in relation to the protection of the archaeological heritage within urban areas, but the overall principles, approaches and methods still apply.*
- *Costs of archaeological are a legitimate part of development costs.*
- *The document advises that the above principles '…apply whatever the particular type of development, whether urban or rural or on land or underwater'.*

7.46 Section 4.5 of this document relates to the 'Protection of wrecks and underwater archaeological objects' and notes that Section 1 of the National Monuments (Amendment) Act 1987 Act provides that 'wreck' means:

'*…a vessel, or part of a vessel, lying wrecked on, in or under the sea bed or on or in land covered by water, and any objects contained in or on the vessel and any objects that were formerly contained in or on a vessel and are lying on, in or under the sea bed or on or in land covered by water*'.

7.47 The document confirms that '*Wrecks more than one hundred years old and archaeological objects situated underwater are afforded comprehensive protection under Section 3 of the National Monuments (Amendment) Act 1987*'.

7.48 Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) of the EIAR undertakes a detailed analysis of the Proposed Development with respect to marine archaeology and cultural heritage. 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).

7.49 Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) of the EIAR concludes that the Proposed Development will not create any significant effects with respect to marine archaeology during the construction, operation, maintenance or decommissioning phases.

8. Regional Planning Policy

Overview

8.1 This section of the Report outlines, and assesses the Proposed Development against, the relevant regional planning policy context, which includes:

- Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031; and
- Southern Regional Assembly Regional Spatial and Economic Strategy.

Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy 2019-2031

8.2 The Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRSES) is a strategic plan and investment framework to shape the future development of the region, including Co. Wicklow, to 2031 and beyond.

8.3 The EMRSES is underpinned by key cross-cutting principles that reflect the three pillars of sustainability: social, environmental and economic and are expressed in a manner which reflects the challenges and opportunities of the region.

8.4 It seeks to determine at a regional scale how best to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. To this end, the EMRSES sets out 16 Regional Strategic Outcomes (RSOs), which are aligned with international, EU and national policy and which in turn set the framework for city and county development plans.

8.5 The 16 RSOs are cross referenced and aligned with the 3 key principles of the EMRSES, these being: Healthy Placemaking; Climate Action; and Economic Opportunity. RSO 9 is reproduced below and is of particular note with respect to the Proposed Development:

> ***'Regional Strategic Outcome 9*** *- Support the Transition to Low Carbon and Clean Energy. Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050.'*

8.6 The EMRSES, as a strategic plan, identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives (RPOs). The following section of this Report identifies the RPOs which relate to the Proposed Development and demonstrates how the Proposed Development will align with their objectives.

Economy and Employment

8.7 The EMRSES recognises that development opportunities in the marine or blue economy relate to a diverse array of uses such as fishing, renewables, new applications for health and medicine, and tourism. Growing the Blue Economy is a key component of the EMRSES. The plan promotes a joined-up approach to planning and management

in the marine area. The following regional policy objectives relate to marine development:

- **RPO 6.22**: '*EMRA support the preparation of the Marine Spatial Plan (MSP) to ensure alignment, and consistency between land use and ocean based planning, and to ensure co-ordination which supports the protection of the marine environment and the growth of the Marine economy.'*

8.8 The Proposed Development will support the national, regional, and local economy by making a significant investment in renewable energy infrastructure and aligns with the aims of RPO 6.22. The Proposed Development has been designed and sited to align with applicable spatial policies and to ensure environmental impacts are minimised. The Proposed Development therefore aligns with the aims of RPO 6.22' given that RPO 6.22 identifies protection of the marine environment as well the growth of the Marine economy.

Environment and Climate

8.9 Section 7.2 of the EMRSES identifies the key EU Directives underpinning integrated land and marine planning in Ireland, such as the Marine Strategy Framework (MSFD), Maritime Spatial Planning (MSP) and Water Framework Directives (WFD). It supports integrated Land and Marine Planning to ensure human activities at sea are as sustainable as possible, and to engage multiple stakeholders. The following objectives relate to integrated land and marine planning:

- **RPO 7.1***: 'To ensure consistency and alignment between the upcoming National Maritime Spatial Plan (due in 2021) and regional approaches to marine spatial planning and to integrate the Marine Strategy Framework Directive and Marine Spatial Planning implementation into future land use plans in the Region in recognition of the opportunity to harness Ireland's ocean potential.'*

- **RPO 7.2**: '*To achieve and maintain 'Good Environmental Status' for marine waters and to ensure the sustainable use of shared marine resources in the Region, and to promote the development of a cross-boundary and cross-border strategic management and stakeholder engagement framework to protect the marine environment*.'

8.10 The EMRSES states that as an island nation, Ireland is highly dependent on its seas and Ireland's marine sector, or blue economy is an important and growing part of the national economy. Recent years have seen significant growth in the sector and increased spending on marine research. Harnessing our Ocean Wealth – An Integrated Marine Plan for Ireland (HOOW) targets a doubling of the value of the maritime economy by 2030 including; shipping, maritime transport, sea fisheries, aquaculture, tourism and energy. One of the future challenges will be to align 'blue growth' with conservation of biodiversity and ecosystem health, while adhering to the objectives of the MSFD, MSP and WFD.

8.11 Fisheries and aquaculture are recognised within the EMRSES as a substantial sub-sector in the Region. It notes that the MSP will play a key role in managing the environmental impacts of 'blue growth' on marine biodiversity, introduction and/or spread of invasive species and increased pollution.

- **RPO 7.3:** "*EMRA will support the use of Integrated Coastal Zone Management (ICZM) to enable collaborative and stakeholder engagement approaches to the management and protection of coastal resources against coastal erosion, flooding and other threats."*

8.12 The EMRSES recognises that the south east coast of Ireland is rich in maritime history and heritage. The EMRSES states that submerged monuments are subject to statutory protection established under section 12 of the National Monuments (Amendment) Act 1994. The plan also points to the UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage, which sets an international standard for the protection of underwater cultural heritage. The plan commits local authorities to protecting shipwreck sites over 100 years old and supports the promotion of submerged tourism through diving on wrecks, coastal wreck trails and maritime heritage tours.

- **RPO 7.6:** '*Local authorities shall include in development plans, where relevant, policies for the protection and enhancement of shipwrecks and underwater cultural heritage and shall consult the Wreck Inventory of Ireland Database when assessing planning applications located in marine, riverine or lacustrine environments.'*

8.13 The EMRSES advises that '*Air pollution is one of the biggest environmental risks to human health leading to respiratory disease, asthma and lung cancer, and to the environment as sources of air pollution also produce climate pollutants.'* The EMRSES identified particulate matter from the burning of fossil fuels as a leading cause of air pollution in the Region.

- **RPO 7.7 '***To reduce harmful emissions and achieve and maintain good air quality for all urban and rural areas in the Region and to work with Local authorities and the relevant agencies to support local data collection in the development of air quality monitoring and to inform a regional air quality and greenhouse gas emissions inventory*.'

8.14 Noise pollution is recognised to have chronic effects on human health, as well as harmful effects on wildlife.

- **RPO 7.8:** "*Local authorities shall incorporate the objectives of the EU Environmental Noise Directive in the preparation of strategic noise maps and action plans that support proactive measures to avoid, mitigate, and minimise noise, in cases where it is likely to have harmful effects."*

8.15 It is recognised that artificial light is important for certain projects, however the inappropriate or excessive use of artificial light – especially blue light – can be harmful to wildlife, particularly nocturnal species and on human health due to sleep disruption. Light pollution can refer to skyglow (the brightening of the night sky over urban areas), light trespass (where light falls where it is not intended) or light glare (where light is excessively bright). Light pollution is increasing in the region due to increasing development.

- **RPO 7.9**: "*Local authorities shall consider measures to minimise the harmful effects of light pollution in the future provision of outdoor lighting, including*

improving their approach to street lighting and ensuring that new developments are lit appropriately and to ensure that environmentally sensitive areas are protected."

8.16 Water quality is critical to the environment and climate of the Irish sea. The following objectives support the Water Framework Directive and improving water quality across the region.

- **RPO 7.10**: "*Support the implementation of the Water Framework Directive in achieving and maintaining at least good environmental status for all water bodies in the Region and to ensure alignment between the core objectives of the Water Framework Directive and other relevant Directives, River Basin Management plans and local authority land use plans."*

- **RPO 7.11: "***For water bodies with 'high ecological status' objectives in the Region, local authorities shall incorporate measures for both their continued protection and to restore those water bodies that have fallen below high ecological status and areas 'At Risk' into the development of local planning policy and decision making any measures for the continued protection of areas with high ecological status in the Region and for mitigation of threats to waterbodies identified as 'At Risk' as part of a catchment based approach in consultation with the relevant agencies. This shall include recognition of the need to deliver efficient wastewater facilities with sufficient capacity and thus contribute to improved water quality in the Region."*

8.17 The EMRSES supports the transition of the region's economy and energy supply to being low carbon, circular, and climate resilient. It recognises this goal will lead to an increase in electricity demand from both increased population and economic development but also resulting from a move away from the use of fossil fuels in the transport and energy sectors. The following objectives are relevant to the Proposed Development and its impact on the transition required as a result of reducing GHG emissions.

- **RPO 7.16: "***Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and local authority development plans."*

- **RPO 7.31: "***Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework."*

- **RPO 7.32**: "*With the assistance and support of the Climate Action Regional Offices, local authorities shall develop, adopt and implement local climate adaptation and mitigation strategies which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance*

with the Guiding Principles of the National Adaptation Framework [2024], National Mitigation Plan [2017]."

8.18 The EMRSES explicitly supports an increase in the amount of new renewable energy sources in the Region. It refers to the development of wind energy – both onshore and offshore, on a larger scale at appropriate sites in accordance with National policy. The plan calls on planning authorities to harness the potential of renewable energy across the technological spectrum, as well as consistency among planning authorities in identifying areas suitable for renewable energy and having regard to potential impacts on biodiversity, landscape and heritage. The following objectives relate to the delivery of renewable energy capacity across the region.

- **RPO 7.36 "***Planning policy at local authority level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions."*

8.19 In relation to the EMRSES topic of Environment and Climate, while the majority of these objectives relate to actions on the part of the relevant authority, the Proposed Development is consistent with or supportive of the relevant RPOs on the basis of the following: the following is considered relevant:

- In respect of stakeholder engagement, the applicant engaged with and sought the views of key stakeholders during the preparation of this Application. This engagement allowed for collaboration with relevant stakeholders in the maritime environment to ensure its long-term sustainable growth and protection, including against coastal erosion, flooding and other threats. The Proposed Development aligns with RPO 7.3.

- In respect of the integration of land and maritime planning, the Proposed Development complies with all applicable national and regional planning policy for the maritime area, thereby aligning with the integrated land and maritime planning framework that is in place as required by RPO 7.1.

- In respect of water quality, details of the development's adherence with water quality standards and protection of the wider ecological environment are provided within the EIAR and NIS submitted as part of this Application. This demonstrates that the Proposed Development aligns with RPO 7.2.

- Turning to matters of heritage (including underwater heritage), air quality, noise, and light, the Application provides for the assessment and protection of marine heritage assets, and the management of noise and light pollution with details set out in the EIAR, including the Environmental Management Plan and Construction Noise Management Plan, and the NIS. This approach is consistent with the objectives on local authorities to reduce impacts of this nature, which are set out in RPO 7.6, 7.7, 7.8 and 7.9.

- The Application is supported by an assessment of impact on water quality and the maritime environment within the EIAR and NIS and a WFD compliance assessment has also been undertaken (see Volume III, Appendix 7.1: Water Framework Directive Assessment (Revised March 2026). This WFD assessment (Revised March 2026) confirms that the activities associated with the Proposed Development are not considered to hinder the achievement of 'Good Environmental Status', as prescribed under the water quality policies. The Proposed Development will not result in a deterioration of the current status of the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea - Killiney Bay (HA 10) coastal water bodies, nor jeopardise the attainment of 'Good' status. This demonstrates that the development can be implemented in an environmentally sensitive way, ensuring the protection of water bodies in the region, thereby consistent with the objectives on local authorities under RPO 7.10 and 7.11.

- The Application assesses the Proposed Development against the requirements of the EU Birds and Habitats Directives and relevant local authority development plans, consistent with the local authority objective RPO 7.16.

- The EIAR submitted with the Application includes an assessment of the Proposed Development's contribution and vulnerability to climate change, including its contribution to emissions. This is consistent with the general local authority and EMRA objectives set out in RPO 7.31 and 7.32.

- A considerable benefit of the Proposed Development is the delivery of a new sustainable source of large scale renewable energy. This supports the principles of RPO 7.36.

Infrastructure

8.20 Energy is a key area of development within the EMRSES. The plan recognises that overreliance on non-indigenous supplies of energy is still a pressing issue for the Region, as well as the need to improve energy efficiency. The plan notes that the transition and diversification of the region's energy supply away from GHG emitting fuels to green energy, such as wind energy, requires the development of a different form of energy grid.

- **RPO 10.24: "***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.*

8.21 In relation to RPO 10.24, the Proposed Development supports the diversification of energy generation away from fossil fuels while making a significant contribution to Ireland's offshore renewable energy portfolio. This remains a significant benefit of the Proposed Development which complies with RPO 10.24.

8.22 In summary the Proposed Development is consistent with the EMRSES taken as a whole and assessed against each of its relevant RSOs and RPOs.

Southern Regional Assembly Regional Spatial and Economic Strategy

8.23 The Southern Regional Assembly Regional Spatial and Economic Strategy (SRSES) provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region including Co Wexford.

8.24 The SRSES is a 12 year strategic regional development framework to guide change in the region. It establishes a broad framework for the way in which the society, environment and economy and use of land should evolve in the region.

8.25 The SRA supports the implementation of the Governments Climate Action Plan, and the SRSES has identified three priority areas for action to address climate change and to bring about a transition to a low carbon economy and society. These include decarbonisation, resource efficiency and climate resilience.

8.26 The SRSES's vision for the Southern Region is led by the need for transformative change and this is reinforced by the SRSES's Strategy to build a strong, resilient and sustainable region. The SRSES's Strategy comprises 11 Statements of the Strategy, which include:

- ***5 - A Strong Economy****: Building a competitive, innovative and productive economy*

- ***8 - Low Carbon, Climate Resilient and Sustainable Society****: Safeguarding and enhancing our environment through sustainable development, prioritising action on climate change across the Region, driving the transition to a low carbon and climate resilient society.*

8.27 The SRSES notes the NPF's 10 National Strategic Outcomes (NSOs) including 'NSO 8 - the Transition to Sustainable Energy' which '*…requires harnessing the considerable on-shore and offshore energy sources and the roll-out of the National Smart Grid Plan'*.

Economy

8.28 The SRSES supports the transition to a low carbon future through investment in the delivery of renewable energy. The following policy reflects the SRSES's commitment to a low carbon economy.

- **RPO 56 - Low Carbon Economy:**

  a) *'The SRSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund.*

  b) *It is an objective to develop enterprises that create and employ green technologies.*

  c) *Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental*

impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries.'

8.29 The SRSES recognises the need to prioritise infrastructure development across the region.

8.30 The following objective relates to the delivery of infrastructure in the southern region.

- **RPO 68 - Regional Investment:** *It is an objective to develop and coordinate the regional investment plan, to enable:*
  - *'Sustainable development of infrastructure that creates a platform for enterprise creation and innovation in the Southern Region;*
  - *Initiatives that protect and strengthen the qualities that distinguish the Southern Region as a high quality of life destination on the global stage;*
  - *All proposals for investment in infrastructure shall be subject to robust site selection and environmental feasibility/assessment including Flood Risk Assessment. This should include explicit consideration of the likely significant effects on European sites and potential for adverse effects on the integrity of European sites in advance of any development.'*

8.31 The SRSES acknowledges the region is ideally placed to improve economic growth through the sustainable use of its marine resource. The following objective relates to the marine economy:

- **RPO 76 - Marine Economy:** *'It is an objective to ensure alignment, and consistency between land use and ocean-based planning, and to ensure co-ordination, which supports the protection of the marine environment and the growth of the marine economy.'*

8.32 The SRSES draws from the National Marine Planning Framework (NMPF) baseline report published in September 2018 by identifying a number of strategic high-level objectives for marine planning, which are supported by the RSES, including:

- *Promote the sustainable development of a thriving ocean economy.*
- *Robust governance and meaningful public and stakeholder participation.*
- *Address land and sea interactions.*
- *Promote vibrant, accessible and sustainable coastal and island communities.*
- *Adapt ecosystems-based approaches and ensure the pressure of human activities take into account the precautionary principle and moves towards achievement of good environmental status.*
- *Realise the potential of marine resources in an integrated fashion.*

- *Promote preservation and enjoyment of marine related cultural and heritage assets.*

- *Strengthen our marine identity.*

- *Develop a sound marine evidence base.*

- *Contribute towards climate change mitigation and adaptation measures.*

- *Consult and coordinate on transboundary issues.*

8.33 The following Regional Policy Objectives relate to supporting the development of offshore wind energy:

- **RPO 77 - Maritime Spatial Planning – Consistency and Alignment:** '*It is an objective to support the integration of different uses in the marine environment and ensure consistency and alignment between high-level plans such as the National Marine Planning Framework, regional based approaches to maritime spatial planning and localised coastal management plans and local integrated coastal zone management plans. It is important to be cognisant of the need to promote cross boundary management of coastal areas within the Region. Any development of plans in coastal zones should be informed by the Strategic Flood Risk Assessment*.'

- **RPO 78 - First Mover under the National Marine Planning Framework:** *'It is an objective to support the sustainable development of the potential of the marine environment, to foster opportunities for innovation in the maritime economy and drive forward the Region as a first mover under marine spatial planning while preserving the environmental and ecological conservation status of our marine natural resource. Initiatives arising from this objective shall be subject to robust feasibility and site selection, which includes flood risk assessments and explicit consideration of likely significant effects on European sites and potential for adverse effects on their integrity in advance of any development. The SRSES encourages close interaction between higher education, state agencies, and enterprise to position the Region as a leader in this field.'*

- **RPO 80 - Marine Resource and Blue Economy**: '*It is an objective to support the development of new coalitions amongst productive sector enterprises, coastal communities and public agencies to support the sustainable development of the marine resource and Blue Economy. Any supports arising, which result in further expansion of, or new enterprise will be subject to the outcomes of the required appraisal, planning and environmental assessment process.'*

8.34 The SRSES supports the development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity through the OREDP. The plan notes that the OREDP specified that the south-east coast is suitable for the development of offshore and tidal wind energy.

- **RPO 85 - Renewable Offshore Energy:** '*To promote regional cooperation in terms of offshore renewable energy development, environmental monitoring and*

awareness of the benefits of realising the Region's offshore energy potential. Initiatives arising from this objective shall be subject to robust feasibility and site selection, which includes explicit consideration of likely significant effects on European Sites and potential for adverse effects on the integrity of European sites in advance of any development.'

8.35 'In relation to 'Section 4 - Economy' of the SRSES, while the majority of these objectives relate to actions on the part of the relevant authority, the Proposed Development is consistent with or supportive of the relevant RPOs on the basis of the following:

- The Proposed Development supports the urgent need to transition to a low carbon economy by delivering a large scale renewable energy development, which aligns with RPO 56.

- In respect of Regional Investment, the Proposed Development represents a sustainable investment in infrastructure which complies with RPO 68.

- In respect of the Marine Economy, the Proposed Development works within the national, regional, and local frameworks for land-use and marine planning and thereby aligns with RPO 76.

- In relation to consistency and alignment with Marine Spatial Planning, the National Marine Planning Framework and Marine Resources and the Blue Economy, the development is consistent with the National Marine Planning Framework (see **Annex 1** of this Report), preserves the environment and ecological interest as described in the EIAR and NIS and is supported by significant engagement with key parties involved in marine resources and blue economy. This complies with RPO 77, 78, and 80.

- In respect of renewable offshore energy, the development has been supported by regional-level engagement key bodies, feasibility, and site selection as a well as assessment of impact on European Sites within the EIAR and NIS provided with this application. This approach complies with the requirements of RPO 85.

Environment

8.36 The SRSES is committed to transposing the Climate Action Plan into policies applicable to the region. The plan's key objectives are decarbonisation, climate resilience and resource efficiency. The following objectives relate to the Proposed Development and the key objectives within the SRSES.

- **RPO 87 - Low Carbon Energy Future**: *'The RSES is a committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.'*

- **RPO 89 - Building Resilience to Climate Change**: *'(a) It is an objective to support measures to build resilience to climate change throughout the Region to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning.'*

8.37 The SRSES recognises the importance of developing alternative renewable energy sources with greater interconnection to energy resources and infrastructure. This will enable the transition away from GHG emitting energy sources.

8.38 The SRSES identifies the potential for continued growth of wind as a major source of renewable energy across the region. Opportunities for both commercial and community wind energy projects are supported within the SRSES to deliver feasible, clean and local electricity production for and in the southern region.

- **RPO 95 - Sustainable Renewable Energy Generation:** "*It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation."*

- **RPO 99 - Renewable Wind Energy:** "*It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines*."

8.39 The SRSES recognises the environmental pressures on water bodies due to increasing demands from human behaviour in relation to population growth, agricultural output, and energy resources. The SRSES states that water bodies will need to be carefully managed to ensure that further deterioration is prevented.

- **RPO 112 - Water Quality:** *"It is an objective to support the commitments to achieve and maintain "At Least Good" status, except where more stringent obligations are required, and no deterioration of status for all water bodies under the Marine Strategy Framework Directive and its programme of measures, the Water Framework Directive and the River Basin Management Plan. Key challenges include, inter alia, the need to address significant deficits in urban waste-water treatment and water supply, addressing flooding and increased flood risks from extreme weather events and increased intense rainfall because of climate change."*

8.40 The Region's varied marine and coastal habitats from the Atlantic Ocean to the Celtic Sea and the Irish Sea, is home to diverse habitats and species. The following objective relates to biodiversity within the region:

- **RPO 126** - **Biodiversity**: The following part applies to the Proposed Development:

  a) "Promote biodiversity protection and habitat connectivity both within protected areas and in the landscape through promoting the integration of green infrastructure and ecosystem services, including landscape, heritage, biodiversity and management of invasive and alien species in the preparation

of statutory and non-statutory land-use plans. The SRSES recognises the role of the National Biodiversity Data Centre through its Citizen Science initiatives."

8.41 In relation to 'Section 5 - Environment' of the RSES, while the majority of these objectives relate to actions on the part of the relevant authority, the Proposed Development is consistent with or supportive of the relevant RPOs on the basis of the following:

- In respect of a low carbon energy future and building resilience to climate change, the Proposed Development makes a significant contribution to meeting carbon energy goals. The Proposed Development's contribution and vulnerability to climate change is assessed in the EIAR submitted with the Application. In this manner, the Proposed Development is consistent with RPO 87 and 89.

- In respect of sustainable renewable energy, renewable energy sources and wind energy, the Proposed Development supports RPOs 95 and 99 at all levels by creating resilience to climate change in the delivery of new, large scale and sustainable wind energy development.

- The assessment of water quality is provided as part of the EIAR and NIS in this application. Taken together this demonstrates that the Proposed Development supports RPO 112.

- In relation to ecology, the application is supported by an EIAR and NIS which outline how the Proposed Development supports the objectives of RPO 126.

Strategic Energy Grid

8.42 The SRSES Strategic Energy Grid section confirms the commitment to transposing the Climate Action Plan into policies applicable to the region. The plan's key objectives are decarbonisation, climate resilience and resource efficiency. The following objectives relate to the Proposed Development:

- **RPO 219 New Energy Infrastructure**: "*It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs."*

- **RPO 222 Electricity Infrastructure**: "*It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity."*

8.43 In relation to 'Section 8 - Strategic Energy Grid' of the RSES, while the majority of these objectives relate to actions on the part of the relevant authority, the Proposed Development is consistent with or supportive of the relevant RPOs on the basis of the following:

- The Proposed Development supports new energy infrastructure delivery through the provision of new large-scale, sustainable energy infrastructure in support of RPO 219.

- In respect of electricity infrastructure, the Proposed Development will, when completed, support the safe, secure, and reliable supply of energy infrastructure into the national grid in support of RPO 222.

8.44 The SRSES supports renewable industries and requirements for transmission and distribution infrastructure, delivered in a sustainable and environmentally sensitive manner. The SRSES recognises the potential to harness renewable energy across the Region to achieve climate change emission reduction targets. The SRSES is supportive of the future growth of renewable energy technologies in the region and its contribution to the decarbonisation of the region.

8.45 In summary and taking the SRSES as a whole, the Proposed Development aligns with the relevant topic areas in the SRSES including Economy, Environment and Strategic Energy Grid and is consistent with the SRSES when assessed against the relevant RSOs and RPOs.

9. Local Planning Policy

Overview

9.1 This section of the Report outlines, and assesses the Proposed Development against, the relevant local planning policy context, which includes:

- Wicklow County Development Plan 2022 – 2028.
- Arklow and Environs Local Area Plan 2018 – 2024; and
- Wexford County Development Plan 2022 – 2028.

Wicklow County Development Plan 2022- 2028

Introduction

9.2 The Wicklow County Development Plan 2022-2028 (WCDP) (as varied) sets out a strategic spatial framework for the proper planning and sustainable development of County Wicklow for the period between 2022 and 2028. The Plan came into effect in October 2022, and was varied in November 2023.

9.3 The WCDP provides for, and controls, the physical, economic and social development of the County, in the interests of the overall common good and in compliance with environmental controls. It also includes a set of development objectives and standards, which set out where land is to be developed, and for what purpose.

Vision and Strategy

9.4 The overarching strategic vision for the County is set out in Section 2.4.1 of the WCDP, which is reproduced below:

> *'To guide and facilitate the **sustainable growth** of the County in a manner which supports a deep respect for its unique natural heritage, capitalises on the potential of our towns and villages to deliver compact growth, facilitates healthy placemaking, supports the creation of self-sustaining settlements and rural areas that are attractive places to live in, work in and visit, **provides for new job opportunities, embraces climate action and enables the transition to a low carbon, climate resilient and environmentally sustainable economy**, improves sustainable mobility and conserves our heritage*.' [**our emphasis**]

9.5 Chapter 2 also identifies three overarching and cross-cutting themes that inform and shape all aspects of the County Development Plan, these being: Healthy Placemaking; Climate Action; and Economic Opportunity.

9.6 Section 2.4.2 of the WCDP sets out the following objective with respect to 'Climate Action':

> *'Integrate climate change objectives into the County Development Plan to facilitate the sustainable growth of the County, **enhance climate resilience and enable the***

transition to a low carbon, environmentally sustainable economy*…'.* [**our emphasis**]

9.7 Section 2.4.3 of the WCDP outlines 10 Strategic County Outcomes and the following are of note with respect to the Proposed Development:

- ***SCO4 Sustainable Healthy Communities****: Places should facilitate a high quality of life for all regardless of age or ability. Access to quality housing, employment, childcare, education, health services, community facilities and a clean unpolluted, environment including clean air and water, are defining elements of healthy, attractive and successful places. Investment in a well-designed public realm which includes public spaces, parks, playgrounds, streets and recreational and sport infrastructure to cater for all ages is essential.*

Consideration: The Proposed Development will comply with SC04 as it will help to reduce both Ireland's and Wicklow's reliance on fossil fuels by providing energy from a clean and renewable source, which in turn, will help to reduce pollution levels and improve air quality.

- ***SCO6 Natural Heritage & Biodiversity:*** *Natural heritage and biodiversity is the cornerstone of Wicklow's identity – 'The Garden of Ireland'. It is essential that we conserve and enhance the County's rich natural heritage and biodiversity for the benefit of current and future generations.*

Consideration: An EIAR has been submitted with the Application for the Proposed Development. This assesses 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 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 Factored-in 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).

The updated EIAR has concluded that no significant effects are predicted on biodiversity receptors. The Proposed Development is also committed to participating in the 'East Coast Monitoring Group' (ECMG), to discuss and agree potential strategic monitoring initiatives in relation to offshore ecology.

In light of the conclusions of the EIAR for all biodiversity related topics, no additional mitigation is required in relation to impacts on species adaptation or migration or natural native habitat connectivity. Following the application of the factored-in

measures, no significant adverse effect on species adaptation, migration or habitat connectivity are predicted.

A Natura Impact Statement (NIS) has been submitted with the Application for the Proposed Development. The NIS concludes that there will be no adverse effects on the integrity of any European sites.

Therefore, taking account of the conclusions within the EIAR and NIS, and the proposed monitoring commitments for bats, marine mammals and birds through the ECMG, the overarching strategic and statutory policy support for the Proposed Development along with the need for it, and its associated public benefits, the Proposed Development complies with SC06.

- ***SCO7 Climate Resilience & the Transition to a Low Carbon Economy:*** *Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of offshore renewable energy enabling infrastructure especially at ports and harbours. Facilitate the sustainable management of waste including the circular economy. Restrict development in areas that are at risk of flooding and protect the natural landscape and biodiversity.*

  Consideration: The Proposed Development will comply with SC07 as it will support the transition to low carbon clean energy by facilitating renewable energy use and generation at an appropriate location.

- ***SCO8 A Strong Economy:*** *Strengthen and broaden the economic base, harness opportunities for economic growth to build economic resilience, strengthen enterprise ecosystems and create quality jobs that align with population growth, ensure a good standard of living and reduce the need for long-distance commuting. Support place making improvements that will generate economic confidence and in turn make settlements more attractive to employers and a skilled workforce. Support community wealth building as a transformative approach which is about creating a better and more sustainable economy that strengthens our communities through local job creation, sustainable development and local business networks.*

Consideration: The Proposed Development will comply with SC08 as it will: support the strengthening and broadening of Wicklow's economic base; enable opportunities for economic growth; and help to create a more sustainable economy. This is supported by Volume III, Appendix 21.2: Supplementary Socio-Economic Analysis (RFI March 2026). The assessment confirms that the Proposed Development will strengthen and broaden Wicklow's economic base through employment creation, Gross Value Added and supply-chain opportunities during the construction, operational, maintenance and decommissioning phases, and will support long-term employment and local investment, thereby contributing to economic resilience and sustainable growth.

- ***SCO9 Tourism****: Capitalise on Wicklow's location within Ireland's Ancient East and facilitate a year round tourism industry that harnesses Wicklow's natural*

amenities and vast recreational opportunities. Ensure that tourism development respects and protects the very assets it depends upon.

Consideration: The proposed development is an offshore windfarm and is not therefore a tourism development. However, the updated EIAR, Volume II, Chapter 21: Population and Human Health (Revised March 2026) together with Volume III, Appendix 21.2: Supplementary Socio-Economic Analysis (RFI March 2026) assesses the Proposed Development against a number of human health and population related factors, including tourism and tourism related receptors. The EIAR and the updated assessment concludes that there will be no significant adverse effects on tourism from the Proposed Development including Ireland's Ancient East and Wicklow's recreational and amenity assets. The Proposed Development therefore does not conflict with SC09.

- ***SCO10 Education & Skills:*** *Recognising the important link between education and skills and employment opportunities, it is necessary to continue to improve the opportunities for education and skills within the County and to further develop Wicklow County Campus Centre of Excellence as a third level education facility for enterprise, education, training, research and development.*

Consideration: The Proposed Development complies with SC10 as it will indirectly facilitate continual education, skills development and training in marine sectors, thereby improving the sustainability, social benefits and economic resilience within the County.

Applicable Chapters and Objectives

9.8 The following Chapters of the WCDP contain objectives which are relevant for the assessment of the Proposed Development:

- Chapter 8 - Built Heritage
- Chapter 9 - Economic Development
- Chapter 15 - Waste and Environmental Emissions
- Chapter 16 - Energy and Information Infrastructure
- Chapter 17 - Natural Heritage and Biodiversity
- Chapter 19 - Marine Spatial Planning & Coastal Zone Management

9.9 The below sections of this Report outline the relevant objectives and accompanying background/contextual text contained in each applicable Chapter and then assesses the Proposed Development against the relevant objectives.

9.10 'Chapter 16 - Energy and Information Infrastructure' and 'Chapter 19 - Marine Spatial Planning & Coastal Zone Management' of the WCDP are of particular relevance to the Proposed Development.

Built Heritage

9.11 Chapter 8 of the WCDP sets out strategies and objectives with respect to the built heritage of the County. 'Section 8.2 – Archaeology' of the WCDP is of note with respect to the Proposed Development.

9.12 The WCDP describes archaeological heritage as '*…structures, constructions, groups of buildings, developed sites, **underwater sites**, moveable objects and monuments of other kinds, as well as their context, whether situated on land or under water*.' [**our emphasis**].

9.13 The WCDP notes that '*Under the National Monuments Acts 1930-1994 all shipwrecks over one hundred years old, underwater archaeological structures, features and objects are protected. The quantification of the underwater archaeological resource is at a preliminary stage with the National Shipwreck Inventory currently being compiled. This source indicates areas of high archaeological potential within marine environments. The Record of Monuments and Places does not include all underwater archaeological sites. As a result the potential exists for development to impact negatively on our underwater cultural resource*.'

9.14 The following objectives are relevant for the Proposed Development:

9.15 The following 'Built Heritage' objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

- ***CPO 8.1:*** *To secure the preservation of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally. In the development management process, there will be a presumption of favour of preservation in-situ or, as a minimum, preservation by record. In securing such preservation, the Planning Authority will have regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage.*

- ***CPO 8.2****: No development in the vicinity of a feature included in the Record of Monuments & Places (RMP) or any other site of archaeological interest will be permitted which seriously detracts from the setting of the feature or which is seriously injurious to its cultural or educational value.*

- ***CPO 8.3****: Any development that may, due to its size, location or nature, have implications for archaeological heritage (including both sites and areas of archaeological potential / significance as identified in Schedules 08.01 & 08.02 and Maps 8.01 & 8.02 of this plan) shall be subject to an archaeological assessment.*

Consideration: Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026 of the EIAR provides a detailed analysis of the Proposed Development with respect to marine archaeology and cultural heritage. This assessment is informed by Volume III, Appendix 18.1: Marine Archaeology Technical Report (Revised March 2026).

Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) concludes that there will be no significant effects with respect to marine archaeology or cultural heritage arising from the Proposed Development during the Construction, Operational and Maintenance or Decommissioning phases.

However, the EIAR notes that there will be a significant cumulative effect arising from the Proposed Development alongside other projects/plans, such as Codling Wind Park and Dublin Array, for indirect impact on the setting of terrestrial cultural heritage assets during the Construction and Operational and Maintenance phases and that the impact is indirect, relates to setting only and do not affect the physical integrity or cultural significance of the assets. No significant cumulative effects are predicted.

It is noted that the cultural assets identified and considered in the EIAR are located between 6.8 km and 40 km from the Array Area.

The assessment of effects on the setting of and views from recorded cultural heritage sites is informed by Volume III, Appendix 18.2: Cultural Heritage Visual Impact Assessment Report (Revised March 2026), alongside Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) and Volume III, Appendix 18.1: Marine Archaeology Technical Report (Revised March 2026). These provide an assessment of the degree to which settings and views from recorded cultural heritage sites may be affected by the Proposed Development, based on the 60km 'Zone of Theoretical Visibility' (ZTV). The Proposed Development therefore complies with CPO 8.3.

The Cultural Heritage Visual Impact Assessment Report concludes that the presence of the Proposed Development will not detract from the ability to understand and appreciate the cultural heritage assets.

In respect of setting, the EIAR concludes that any cumulative effects relate to changes in setting only and no significant adverse residual effects have been predicted in respect of the setting of terrestrial cultural heritage assets. The Proposed Development therefore complies with CPO 8.2

Volume III, Appendix 18.1: Marine Archaeology Technical Report (Revised March 2026) is further supported by additional geophysical survey data acquired in 2024, which has refined understanding of seabed conditions and archaeological potential within the proposed development area. As a result, archaeological exclusion zones will be established around each known shipwreck site and potential site within which no installation activities will take place. Volume III, Appendix 25.9: Archaeological Management Plan (Revised March 2026) will inform the construction, operational and maintenance and decommissioning phases of works to ensure the protection of archaeological heritage. The principle of avoidance has informed the design process whereby impacts on known archaeological sites have been avoided wherever possible. The Proposed Development therefore complies with CPO 8.1.

Economic Development

9.16 Chapter 9 of the WCDP sets out objectives for the sustainable development of Wicklow's economy and identifies key economic sectors for the County which includes 'Maritime' economy.

9.17 The WCDP acknowledges that '*The marine economy is a key enabler of effective economic growth…'* and that *'The maritime sector in Wicklow benefits from a host of assets and activities capable of expansion and development including: servicing of the off-shore renewable energy industry, etc*'.

9.18 The WCDP further notes that established ocean and coastal economic sectors include energy exploration and production and that Wicklow County Council supports the identification and realisation of the economic opportunities within the Maritime sector.

9.19 Indeed, the WCDP identifies '*Off-shore wind energy is a significant opportunity area for the County*' and acknowledges that the '*County has already established itself as a location for off-shore wind*'.

9.20 The WCDP recognises that in the future, '*Wicklow could face significant changes with the potential development of marine renewable energy, more specifically wind, following the identification of the Assessment Zone 2 – Wind and Tidal in the Strategic Environmental Assessment (SEA) of the Offshore Renewable Energy Development Plan (OREDP)*'.

9.21 The WCDP notes that '*The Government is committed to generating at least 80% of energy from renewable sources by 2030'* and it also makes specific reference to the Proposed Development as follows: *'There are 3 major offshore wind projects at various stages of planning off the County Wicklow Coast. The Arklow Bank Project is proceeding under an extant permission…*'.

9.22 The following 'Economic Development' objective is relevant with respect to the assessment of the Proposed Development:

- ***CPO 9.21*** *To encourage and facilitate the 'circular economy' and the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation.*

Consideration: Having regard to the findings of Volume II, Chapter 21: Population and Human Health (Revised March 2026) and Volume III, Appendix 21.2: Supplementary Socio-Economic Analysis (RFI March 2026) , the Proposed Development complies with CPO 9.21. The Proposed Development will support the transition to a circular and low-carbon economy by facilitating the delivery of offshore renewable energy and by supporting the growth of green industries associated with renewable energy generation including associated supply chains, skills development required to support long-term operational and maintenance activities. These outcomes contribute to sustainable economy consistent with the objectives of CPO 9.21.

Waste and Environmental Emissions

9.23 Chapter 15 of the WCDP sets out relevant objectives in relation to solid and hazardous waste management, emissions to the air, as well as noise and light pollution. This Chapter is informed by EU and national legislation in relation to waste and pollution.

9.24 The WCDP is committed to supporting development that will produce minimal waste and not produce pollution through GHG emissions, noise, and light pollution. All forms of pollution are linked to the degradation of biodiversity and have a direct impact on human and wildlife health.

9.25 The following Waste and Environmental Emissions objectives are relevant with respect to the Proposed Development:

Solid Waste Management Objectives

- ***CPO 15.1****: seeks to require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site.*

- ***CPO 15.2****: requires all new developments, whether residential, community, agricultural or commercial to make provision for storage and recycling facilities (in accordance with the standards set out in Development & Design Standards of this plan).*

Consideration: In compliance with CPO 15.1 and 15.2, a Resource and Waste Management Plan has been submitted with the Application (Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026)). The Resource and Waste Management Plan provide the information necessary to guide and support the compliant and efficient management of wastes associated with the Proposed Development across the construction, operational and maintenance and decommissioning phases including storage and reuse/recycling. 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.

Air Pollution Objectives

- ***CPO 15.9****: To regulate and control activities likely to give rise to emissions to air (other than those activities which are regulated by the EPA).*

- ***CPO 15.10****: To require proposals for new developments with the potential for the accidental release of chemicals or dust generation, to submit and have approved by the Local Authority construction and/or operation management plans to control such emissions.*

- ***CPO 15.11****: To require activities likely to give rise to air emissions to implement measures to control such emissions, to undertake air quality monitoring and to provide an annual air quality audit.*

Consideration: Volume II, Chapter 20:Air Quality and Climate (Revised March 2026) of the EIAR assesses the potential impacts of the Proposed Development with respect to air quality and climate across the construction, operational and maintenance and decommissioning phases.

With respect to air quality, Volume II, Chapter 20:Air Quality and Climate (Revised March 2026) concludes that there will be a slight adverse effect (which is not deemed significant in EIA terms) during the construction and decommissioning phases and a negligible effect (not significant in EIA terms) during the operational phase of the Proposed Development.

With respect to climate, Volume II, Chapter 20:Air Quality and Climate (Revised March 2026) also confirms the Proposed Development will give rise to a major beneficial effect (significant in EIA terms) during the operational phase, due to the displacement of fossil fuel based electricity generation, and a net beneficial impact on climate at local, national and global levels over the full lifecycle of the proposed development.

Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026) is also submitted with the Application to ensure that the construction, operational and maintenance and decommissioning phases will be carried out in accordance with relevant standards and will provide a framework for the implementation of appropriate environmental control measures, including pollution prevention and the management of accidental release of substances. Therefore, the Proposed Development complies with CPO 15.9, 15.10 and 15.11.

Noise Pollution Objectives

- ***CPO 15.12****: To implement the Wicklow County Council Noise Action Plan 2018-2023 (and any subsequent Plan) in order to avoid, prevent and reduce the harmful effects, including annoyance, due to environmental noise exposure.*

- ***CPO 15.13****: To enforce, where applicable, the provisions of the Environmental Protection Agency (EPA) Acts 1992 and 2003, and EPA Noise Regulations 2006.*

- ***CPO 15.14:*** *To regulate and control activities likely to give rise to excessive noise (other than those activities which are regulated by the EPA).*

- ***CPO 15.15:*** *To require proposals for new developments with the potential to create excessive noise to prepare a construction and/or operation management plans to control such emissions.*

  CPO 15.16*: To require activities likely to give rise to excessive noise to install noise mitigation measures to undertake noise monitoring and to provide an annual monitoring audit.*

Consideration: The EIAR confirms that the Proposed Development will not result in significant effects with respect to airborne noise. Volume II, Chapter 8: Airborne Noise (Revised March 2026) of the EIAR, confirms that any airborne noise effects arising during construction and decommissioning will be temporary and not significant, with no significant operational airborne noise effects predicted and therefore no operational noise mitigation measures or management plan are required.

Volume III, Appendix 25.8: the Construction Noise Management Plan (Revised March 2026) (CNMP), has been updated in response to the RFI and is submitted along with the Application. The CNMP sets out measures and controls that will be implemented to limit airborne noise emissions at noise sensitive receivers during construction. An operational noise management plan is not required. Decommissioning noise impacts are significantly less than during the construction phase and activities at distances of six kilometres or greater offshore will not be audible onshore. Noise impacts for the decommissioning phase have therefore been scoped out of the CNMP.

Please refer to the EIAR for further details in relation to the above, particularly Volume II, Chapter 8: Airborne Noise (Revised March 2026), Volume II, Chapter 11: Marine Mammals (Revised March 2026), Volume III, Appendix 8.1: Airborne Noise Technical Report (Revised March 2026), Volume III, Appendix 11.2: Underwater Noise Assessment (Revised March 2026) and Volume III, Appendix 25.8: Construction Noise Management Plan (Revised March 2026).

The Proposed Development therefore complies with CPO 15.15 and CPO 15.16.

CPO 15.12 to CPO 15.14 seek to avoid, prevent and reduce the harmful effects of environmental noise and to control activities likely to give rise to excessive noise. The Proposed Development meets these objectives as it minimises potential noise impacts through design, mitigation and management measures.

Light Pollution Objectives

- ***CPO 15.17:*** *To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting the amenities of nearby properties, traffic and wildlife.*

- ***CPO 15.18:*** *To require proposals for new developments with the potential to create light pollution or light impacts on adjacent residences to mitigate impacts, in accordance with the Development & Design Standards set out in this plan.*

- ***CPO 15.19****: To promote the use of low energy LED (or equivalent) lighting.*

- ***CPO 15.20****: To require the design and implementation of a hierarchy of light intensity zones in development schemes to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors.*

Consideration: Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) of the EIAR assesses the night time impact of the proposed aviation lighting. Specifically, the assessment has been updated to reflect refinements to the project layout and lighting strategy. An assessment of the effects of night-time lighting associated with the Proposed Development is undertaken from four representative viewpoints. These viewpoints have been selected to enable consideration of the effects of night-time lighting on a range of receptors and locations which feature different levels of baseline lighting.

The layout of WTGs and Offshore Substation Platforms (OSPs) has been designed in such a way to minimise the impacts on Seascape, Landscape, Visual Impacts Assessment (SLVIA) where possible and address navigational safety and search and rescue access requirements.

The EIAR assesses two potential aviation lighting scenarios: a white aviation lighting scenario in accordance with the Irish Aviation Authority guidance and a red aviation lighting scenario reflecting aviation safety requirements of the Department of Defence. Under the white aviation scenario, lights will be fully cut off so that practically no light will be emitted below the horizon. The EIAR identified significant visual effects associated with the mandatory night time lighting, which arises from safety-required lighting and relates to visual perception only.

It is noted that the proposed lighting is required for safety/warning purposes to comply with relevant Irish Aviation Authority requirements. A Lighting and Marking Plan (LMP), updated in response to the Request for Further Information is also submitted with the Application (see Volume III, Appendix 25.6: Lighting and Marking Plan (Revised March 2026) of the EIAR). The LMP has been informed by consultation with the Commissioner of Irish Lights, Department of Defence, Irish Coastguard, Marine Survey Office and the Irish Aviation Authority and will be in compliance with the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) G1162 (IALA, 2021).

In respect of CPO 15.17 and CPO 15.18, the EIAR concludes that lighting effects arise from aviation safety requirements only and relate to visual perception, with lights fully cut-off below the horizontal in accordance with Irish Aviation Authority guidance, thereby minimising light spill and potential impacts on nearby receptors. Lighting has been designed to ensure that light spillage, glare or dazzle are not excessive and limited to that required to meet aviation and health and safety requirements. The Proposed Development complies with CPO 15.18.

In respect of CPO 15.19, Volume III, Appendix 25.6: Lighting and Marking Plan (Revised March 2026) provides for aviation lighting designed to meet prescribed aviation safety standards and to minimise light output and energy usage insofar as practicable, including provision for the use of low-energy LED lighting (subject to aviation requirements) and the use of baffling and directional lighting to minimise unnecessary light emission.

In respect of CPO 15.20, the LMP applies controlled aviation and navigational lighting in accordance with prescribed guidance, including baffled fittings to prevent light emission below the horizontal and variable light intensity levels dependent on background luminance, and lighting only on selected peripheral structures, thereby minimising environmental effects as far as practicable.

Therefore, taking account of the purpose of the proposed lighting, the updated design and mitigation measures set out in Volume II, Chapter 25: Summary of Factored in Measures, Mitigation and Monitoring (Revised March 2026), and the conclusions within the EIAR, as well as the overarching strategic and statutory policy support for the Proposed Development along with the need for it, and its associated public

benefits, the Proposed Development complies with CPO 15.17, CPO 15.18, CPO 15.19 and 15.20.

Energy and Information Infrastructure

9.26 Chapter 16 of the WCDP focuses primarily on 'energy infrastructure' associated with the production, distribution and use of energy.

9.27 The WCDP notes that '*Ireland's energy requirements have increased significantly over the past two decades due to growth in energy consumption for transport, electricity and heating. Linked with increasing economic growth, Ireland's overall demand for energy continues to rise*.'

9.28 However, despite the increase in energy demand, the WCDP advises that '*…energy-related CO2 emissions fell slightly, mainly due to a reduction in the amount of coal used for electricity generation, along with increased contributions from wind generation*'.

9.29 The WCDP cites SEAI's 'Renewable Energy in Ireland 2020 Update' report which found that Ireland was not on track to meet its 2020 targets with overall renewable energy supply at 11% of gross final consumption short of the 16% target and the share of renewable electricity (RES-E) was 33.2%, short of the 40% electricity demand target.

9.30 In light of this shortfall, the WCDP advises that '*It is therefore imperative that further progress is made in this area and that alternative renewable sources are further expanded and developed*'. Consequently, the WCDP sets out the following general energy objective:

> ***CPO 16.01****: To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel.*

Consideration: The Proposed Development complies with CPO 16.01 as it will deliver a renewable source of energy that will generate electricity. Section 16.3 of the WCDP sets out a number of other 'Energy Infrastructure & Communications Objectives', however, these objectives relate specifically to onshore wind energy projects as well as the onshore components of offshore wind energy projects. As such, these objectives are not relevant to the Proposed Development.

Chapter 17 - Natural Heritage and Biodiversity

9.31 Chapter 17 of the WCDP sets out strategies and objectives with regard to the natural heritage and biodiversity in the County. This chapter of the WCDP also addresses landscape issues not solely related to nature conservation, such as landscape characterisation and identification of views and prospects worthy of protection.

9.32 The WCDP notes that *"Protecting and enhancing biodiversity and landscapes is vital for the health, well-being and quality of life of communities today and it has a vital role to play in our response to the climate emergency."*

9.33 The WCDP contains the following definitions for natural heritage, biodiversity and landscape:

- *Natural heritage includes the variety of life, often referred to as biodiversity, its physical or geological foundation, and the landscapes which form the surrounding environment.*

- *Biodiversity refers to the variety of life on earth. It includes the habitats and ecosystems, which support this life and how life-forms interact with each other and the rest of the environment. Biodiversity covers plants, animals and micro-organisms both on land and in water. It relates to both wildlife and domesticated crops and animals.*

- *Ireland signed and ratified the Council of Europe's European Landscape Convention (ELC) which came into effect on 1 March 2004. The European Landscape Convention defines landscape as '…an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'.*

9.34 The WCDP notes that '*The Council has an important role to play when it comes to promoting a reasonable balance between conservation measures and development needs, in order to avoid negative impacts upon the natural environment, mitigate the effects of harm where it cannot be avoided, and to promote the appropriate enhancement of the natural environment as an integral part of any development*'.

9.35 The following 'Natural Heritage and Biodiversity' objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

General

- ***CPO 17.1:*** *To protect, sustainably manage and enhance the natural heritage, biodiversity, geological heritage, landscape and environment of County Wicklow in recognition of its importance for nature conservation and biodiversity and as a non-renewable resource.*

- ***CPO 17.2****: Ensure the protection of ecosystems and ecosystem services by integrating full consideration of these into all decision making.*

- ***CPO 17.3****: To support and promote the implementation of the County Wicklow Heritage Plan and the County Wicklow Biodiversity Action Plan.*

Protected Sites and Species

- ***CPO 17.4:*** *To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs). To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:*

(a) *EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019);*

(b) *National legislation, including the Wildlife Acts 1976 and 2010 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection order 2015;*

(c) *National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);*

(d) *Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same);*

(e) *Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan;*

(f) *Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same, and to make provision where appropriate to address the report's goals and challenges.*

- **CPO 17.5:** *Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommission or from any effects shall not be permitted on this basis of this plan Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) adequate compensatory measures in place*.

- ***COP 17:6:*** *Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per*

Article 10 of the EU Habitats directive, All projects and plans arising from the WCDP will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.

- ***CPO 17.7:*** *To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites in Wicklow.*

- ***CPO 17.8****: Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

Consideration: The EIAR assesses potential significant adverse impacts on species adaptation or migrations, or on natural habitat connectivity in Volume II of the EIAR Chapters 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), 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 Factored-in 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).

The updated EIAR concludes that no significant adverse effects are predicted on biodiversity receptors following the application of the factored-in measures. It is unlikely that the population abundance of species will be adversely affected by the Proposed Development and long-term viability of relevant populations will be maintained.

In light of the conclusions of the EIAR for all biodiversity-related topics, no additional mitigation is required in relation to species adaptation, migration or natural habitat connectivity. The Proposed Development is also committed to participation in the ECMG to support strategic monitoring initiatives in relation to offshore ecology as documented within the Operational Monitoring Programme (RFI March 2026) which is presented in Annex A in Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026).

A Natura Impact Statement (NIS) (Revised March 2026) has been submitted with the Application to inform Stage 2 Appropriate Assessment under Article 6 (3) of the Habitats Directive. The NIS concludes that there will be no adverse effects on the

integrity of any European sites either alone or in combination with other plans or projects.

Accordingly, taking account of the conclusions of the EIAR and NIS, the Proposed Development complies with CPOs 17.1 – 17.8.

Sites & Corridors of Ecological & Biodiversity Value

- ***CPO 17.12****: To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

- ***CPO 17.17****: To work with statutory authorities to prevent and control the spread of invasive plant and animal species and require, where appropriate Invasive Species Management Plans to be prepared as part of the development management process where necessary.*

Consideration: Volume II, Chapter 9: Benthic Subtidal and Intertidal Ecology(Revised March 2026) and Volume II, Chapter 10 - Fish, Shellfish and Sea Turtle Ecology' (Revised March 2026) of the EIAR address the components outlined in objectives 17.12 and 17.17, with invasive non-indigenous species prevention and control measures set out within Volume III, Appendix 25.4: the Invasive Non-Indigenous Species Management Plan (Revised March 2026), Volume III, Appendix 25.1: the Environment Management Plan (Revised March 2026) and the relevant topic chapters in Volume II of the EIAR.

A Natura Impact Statement (NIS) has also been prepared for, and submitted with, the Application for the Proposed Development. The NIS concludes that there will be no adverse effects on the integrity of any European sites.

Noting the conclusions of the EIAR and NIS, and the implementation of embedded mitigation and management measures, it is considered that the Proposed Development complies with objectives 17.12 and 17.7.

Water Systems

- ***CPO 17.24****: seeks to ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.*

Consideration: The EIAR assesses the potential impact on marine water and sediment quality from the Proposed Development in Volume II, Chapter 7: Marine Water and

Sediment Quality (Revised March 2026). This assessment has incorporated updated site-specific sediment characterisation surveys undertaken in 2024 and additional sediment plume modelling (Volume III, Appendix 6.1: Marine Physical Processes Numerical Modelling (Revised March 2026)) to further refine the assessment of potential effects on water quality. Activities associated with the Proposed Development will give rise to suspended sediment plumes and may cause a deterioration in water quality. However, the increased concentration of sediment is not expected to last more than a matter of days, with impacts similar to that experienced during storm activity. The relevant receptors are expected to fully recover from the development activities, resulting in effects that are not significant in EIA terms.

The implementation of an EMP (Volume III, Appendix 25.1: the Environment Management Plan (Revised March 2026)) and Marine Pollution Contingency Plan (MPCP) will significantly reduce the likelihood of an accidental spill occurring.

A WFD compliance assessment has also been undertaken (see Volume III, Appendix 7.1: Water Framework Directive Assessment (Revised March 2026) of the EIAR) to consider the potential effects of the Proposed Development and ensure that the proposed activities 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.

The conclusions reached through the WFD assessment are also applicable for the Marine Strategy Framework Directive. The WFD assessment confirms that the activities associated with the Proposed Development are not considered to hinder the achievement of 'Good Environmental Status', as prescribed under the water quality policies. The Proposed Development will not result in a deterioration of the current status of the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea - Killiney Bay (HA 10) coastal water bodies, nor jeopardise the attainment of 'Good' status.

The WFD assessment also concludes that the cumulative impacts of the Proposed Development with other projects are not anticipated to result in the deterioration of current status, nor jeopardise attainment of 'Good' status for the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea- Killiney Bay (HA 10) coastal water bodies.

Noting the above, the Proposed Development complies with CPO 17.24.

Landscape, Views & Prospects

- ***CPO 17.35****: All development proposals shall have regard to the County landscape classification hierarchy in particular the key landscape features and characteristics identified in the Wicklow Landscape Assessment (set in Volume 3 of the 2016 County Development Plan) and the 'Key Development Considerations' set out for each landscape area set out in Section 5 of the Wicklow Landscape Assessment.*

  CPO 17.38*: To protect listed views and prospects from development that would either obstruct the view / prospect from the identified vantage point or form an*

obtrusive or incongruous feature in that view / prospect. Due regard will be paid in assessing development applications to the span and scope of the view / prospect and the location of the development within that view / prospect.

Consideration: A 'Seascape, Landscape and Visual Impact Assessment' (SLVIA) has been undertaken for the Proposed Development (see Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) and has been updated as part of the RFI response. The SLVIA has assessed potential seascape, landscape, landscape designation and visual effects arising during the construction, operational and maintenance, and decommissioning phases of the Proposed Development, within the identified Zone of Theoretical Visibility.

CPO 17.35 and CPO 17.38 require that landscape and visual effects are properly assessed with regard to landscape character, listed views and prospects, and do not seek to entirely preclude change of any nature arising from development.

The SLVIA assessment adopts the county's Landscape Character Assessment as the landscape baseline framework and evaluates the likely effect of the proposed development on the relevant Wicklow Landscape Character Areas, namely the Mountain Uplands, Bray Mountains Group/Northern Hills, Northern Coastal Area and Southern Coastal Area, thereby having regard to the landscape character hierarchy and associated characteristics identified in the Wicklow Landscape Assessment. The proposal therefore complies with CPO 17.35.

The updated SLVIA concludes that the Proposed Development would give rise to significant adverse seascape, landscape and visual effects, particularly for coastal and near-coastal receptors, during both daytime and night time conditions. Significant effects are identified at a range of viewpoints and receptors in closest proximity to the Array Area, with the magnitude of effects diminishing with distance offshore and inland. The SLVIA indicates that these effects are most pronounced during the operational phase and represent long-term changes to seascape, landscape character and views, consistent with the scale and nature of offshore wind energy development.

Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) of the EIAR identifies a significant cumulative effect on indirect impact on the setting of terrestrial cultural heritage sites arising from the Construction, Operational and Maintenance phases of the Proposed Development which cannot be mitigated.

In respect of listed views and prospects, the Proposed Development is located offshore and would be viewed as part of an expansive seascape. The turbines would be visible within the relevant views and prospects but would not obstruct the principal coastal or horizon views from identified vantage points, with wider panoramas of the sea and coast being retained. When viewed within the relevant views and prospects, the Proposed Development would be experienced within a wide, open and large-scale seascape, which is already partially influenced by existing offshore wind development at the existing Arklow Bank Wind Park (ABWP1). The Proposed Development would not be seen as an entirely new or unfamiliar feature in these views out to sea, given the operational presence of ABWP1, which has become a familiar feature in offshore views. In this context, the Proposed Development would not be regarded as obtrusive or incongruous, however, the SLVIA does conclude that the Proposed Development

will form a notable increase in the extent of offshore windfarm development readily visible across the seascape and result in a high magnitude of change when viewed from the closest parts of the coast.

From the outset, the design of the Proposed Development has sought to minimise seascape, landscape and visual effects through careful consideration of turbine layout, spacing and associated infrastructure. The Proposed Development has subsequently been subject to design refinements in response to search and rescue requirements and ground conditions. These changes and improvements have resulted in incidental changes to the seascape, landscape and visual effects of the Proposed Development, although the overall conclusion on significant effects in the EIAR remains the same. This is due to the reduced number of turbines, in the case with Project Design Option 1, refinement of turbine layout and spacing in response to search, rescue and navigation safety requirements, the selection of turbine technology with a reduced chord width, careful siting of Offshore Substation Platforms, and the design and control of aviation and navigational lighting, from a SLVIA perspective, reduce the number of visible vertical elements, create a more ordered and less dense layout across the horizon, reduce blade visibility and reflectivity, and minimise night-time prominence.

Mitigation measures are included to minimise the visual impact of the Proposed Development. These measures are aligned with industry best practice and applicable guidelines, as set out in Volume II, Chapter 25: Summary of Factored in Measures, Mitigation and Monitoring (Revised March 2026). The turbine towers above the foundation level will be finished in a neutral grey colour to reduce visual contrast with the sky at distance. Aviation and marine navigation lighting and marking will be installed in accordance with applicable aviation and maritime safety requirements and implemented through the approved Lighting and Marking Plan (Volume III, Appendix 25.6: Lighting and Marking Plan (Revised March 2026)), with baffling applied where required so that light emitted below the horizontal is minimised. Further details of the factored-in measures, mitigation and monitoring measures are provided in Volume II, Chapter 25: Summary of Factored in Measures, Mitigation and Monitoring (Revised March 2026). Taking account of the conclusions of the SLVIA, the factored-in measures incorporated to reduce effect (as outlined above and in the EIAR), the additional visualisation provided in response to RFI item 14 (a) and the residual significant effects identified, the Proposed Development, together with other material planning considerations, must be weighed as part of the overall planning balance.

In this regard, the Proposed Development delivers offshore renewable energy infrastructure of strategic national importance, contributing to the achievement of Ireland's statutory climate change mitigation and decarbonisation targets, enhancing security of electricity supply, and delivering significant socio-economic benefits at national, regional and local levels, as demonstrated within Volume II, Chapter 20: Air Quality and Climate (Revised March 2026) and supporting appendices and outlined at Section 5 of this Planning Report.

The Proposed Development would provide approximately 0.8 GW of renewable electricity generation capacity and would make a material contribution toward national offshore wind delivery targets, including contributing approximately 16% of

the 5GW national offshore wind target for 2030, with the EIAR confirming that electricity generated would displace fossil-fuel generation and result in measurable reductions in greenhouse gas emissions (including estimated annual carbon savings of approximately 1.65-2.15% of projected total national emissions in 2030) which would not otherwise occur. The development would also contribute to resilience of electricity supply through increased domestic renewable generation and reduced reliance on imported fuels, and would give rise to positive public benefits including employment creation, regional investment and positive Gross Value Added effects over the operational lifetime of the project, including the creation of approximately 1,720 annualised Full Time Equivalent (aFTE) jobs during construction, around 70 long term operational roles, and the generation of over €500 million in Gross Value Added over the operational lifespan. The project also provides for structured community benefit funding, including a fund of up to €3 million per annum (subject to route to market), alongside ongoing engagement with local stakeholders to ensure that benefits are shared with host communities.

The WCDP itself contains policy support for renewable energy and climate action. In particular, CPO 16.01 seeks to support and facilitate, to the highest degree possible, the development of alternative and renewable sources of energy, including electricity generation. CPO 9.21 supports the development of green industries including renewable energy technologies. These objectives sit alongside the landscape protection policies including CPO 17.35 and CPO 17.38. The Development Plan therefore requires a balanced judgement to be made between the promotion of renewable energy and climate action and the protection of landscape and visual amenity.

The statutory climate objectives and the approved Climate Action Plan as part of the Climate Act must also be actively considered by the planning authority in the decision-making process, with their decision is required to be consistent, as far as practicable, with climate objectives (as confirmed by the Supreme Court in Coolglass Wind Farm Limited v An Bord Pleanála[1] [2026] IESC 5).

Furthermore, having regard to the strategic government policy and statutory national policy support for offshore renewable energy, together with the WCDP renewable energy objectives, the identified seascape, landscape and visual effects are outweighed by the contribution the Proposed Development will make to achieving climate change targets and the socio economic benefits of the Proposed Development. The Proposed Development therefore complies with CPO 17.35 and CPO 17.38.

Marine Spatial Planning & Coastal Zone Management

9.36 Chapter 19 of the WCDP is relevant to the Proposed Development identifying that is it located within the 'marine area'.

9.37 The WCDP notes that '*The coastal areas of County Wicklow are amongst the most scenic, sensitive and valuable resources in the County*' and that the '*The sea itself is also an important resource for the County and many of the activities that take place off-shore have an impact on the land and coastal areas and therefore it is important to take into consideration such impacts'*.

9.38 The WCDP acknowledges that '*Planning in our coastal and marine areas is changing in Ireland with new procedures and government policy emerging for marine spatial planning and the management of development in our maritime areas*.' It describes marine spatial planning as:

> *'…a new way of looking at how we use the marine area; it is about planning when and where human activities take place at sea. It aims to balance the different demands for using the sea including the need to protect the marine environment. It's about ensuring these uses and activities are as efficient and sustainable as possible.'*

9.39 The WCDP advises that the protection and appropriate development of our coastal zone and marine environment will contribute to numerous goals across the WCDP's three pillars of 'sustainable healthy communities', 'climate action' and 'economic opportunity' by:

- *'conserving and enhancing coastal and marine biodiversity, protected habitats and species.*
- *identifying, protecting and enhancing coastal green and blue infrastructure and ecosystem services and promote the sustainable management of strategic natural assets such as coastlines, farmlands, peatlands, uplands woodlands and wetlands.*
- *building resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security.*
- *reduction and management of coastal and estuarine flood risk.*
- ***supporting and appropriately managing the impacts of the development of alternative and renewable sources of electricity including offshore wind**, wave and tidal energy*.
- *supporting employment growth around Wicklow's natural resources and supporting key sectors for growth particularly the maritime industry including support services for offshore wind energy, tourism and recreation.*
- *ensuring access to coastal areas for active and passive uses to support physical and mental health and well-being within the community.'* [**our emphasis**]

9.40 In setting out the relevant legislative and strategic context, the WCDP recognises that '***There is a significant opportunity for Wicklow to take advantage of the Offshore Wind Sector** and any associated spin offs such as on-shore 'operations and maintenance' facilities and the creation of a 'local offshore wind enterprise zones*.' [**our emphasis**]

9.41 Chapter 19 of the WCDP sets out the following objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

9.42 The following 'Marine Spatial Planning & Coastal Zone Management' objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

Marine Planning Objectives

- ***CPO 19.3****: To support the development of the Marine Economy / Blue Economy sector, particularly in the renewable energy, shipping and fishing / aquaculture sectors. To support the work of the Wicklow Maritime Business Development Group and the implementation of strategies and projects related to enhancing the marine economy.*

Consideration: The Proposed Development complies with CPO 19.3 as it will deliver a new renewable source of energy to support the Marine/Blue Economy.

Coastal Zone Management Objectives

- ***CPO 19.8:*** *To protect the character and visual potential of the coast and conserve the character and quality of seascapes.*

- ***CPO 19.9:*** *To strictly control the nature and pattern of development within coastal areas and ensure that it is designed and landscaped to the highest standards, and sited appropriately so as not to detract from the visual amenity of the area. Development shall be prohibited where the development poses a significant or potential threat to coastal habitats or features, and/or where the development is likely to result in undesirable patterns of erosion or deposition elsewhere along the coast.*

Consideration: Compliance with CPO 19.8 and 19.9 is already confirmed in this Report, through the assessment for CPO 17.35 and 17.38 at para. 9.36 above.

- ***CPO 19.13****: Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan. Except as provided for in Article 6(4) of the Habitats Directive, viz. there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) adequate compensatory measures in place. Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats Directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.*

Consideration: Compliance with CPO 19.13 is already confirmed in this Report through the assessment for CPO 17.1 – 17.8 at para. 9.36 above.

9.43 Having assessed the Proposed Development against the relevant objectives of the WCDP and taking account of the need for, and benefits of, the Proposed Development,

outlined in this Planning Report, it is considered that the Proposed Development complies with the overarching Vision, Strategic County Outcomes, Core Strategy and Objectives of the WCDP.

Arklow and Environs Local Area Plan 2018 – 2024

9.44 The Arklow and Environs Local Area Plan (the LAP/Plan) 2018 to 2024 sets out a land use framework to guide the future sustainable development of the settlement of Arklow town and its environs. The LAP, in conjunction with the County Development Plan, will inform and manage the future development of the area.

9.45 The LAP reflects that Arklow is already leading in offshore energy development in Ireland and already has a key role in electricity transmission and distribution with seven no. offshore wind turbines in operation as part of Arklow Bank 1, several high voltage electricity lines crossing the plan area, and the electricity station at Killiniskyduff.

9.46 The LAP acknowledges that *'The maritime sector in Arklow benefits from a host of assets and activities capable of expansion and development including: shore-side services, shipping services, repair and maintenance, fishing, tourism and leisure, servicing of the off-shore renewable energy industry, maritime financial services etc.'*

9.47 Noting this, the LAP advises that *'Wicklow County Council supports the identification and realisation of the economic opportunities within this sector'.*

9.48 The LAP advises '*…all lands located outside the LAP are considered to be within the 'rural area'. Within this rural area planning applications shall be assessed having regard to the objectives and standards for the rural area, as set out in the Wicklow County Development Plan*'. Notwithstanding, the following objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

Vision for Arklow

- ***6 Employment Activity****: To facilitate and encourage the growth of a broad range of employment, enterprise and economic activity in the settlement, to support the port and manufacturing employment tradition in the settlement.*

- ***9 Unique Heritage****: To recognise, protect and strengthen the unique character, built heritage, seaside location, maritime history and natural environment of the area, ensuring that this heritage can continue to contribute positively to the overall quality of life, biodiversity, recreation and tourism role of the settlement.*

- ***10 Adapt to Climate Change****: To address the climate change challenge, directly in the areas of flooding and renewable energy, and indirectly by integrating adaptation to climate change and sustainable development into the plan objectives.*

Infrastructure Strategy for Arklow

- Facilitate and promote the delivery of reliable and effective water, drainage, energy, waste management and communications infrastructure to service the existing and future development needs of the settlement.

Heritage Strategy for Arklow

- To protect the natural, architectural, archaeological and maritime heritage of Arklow and its environs. To enhance the quality of the natural and built environment, to enhance the unique character of the town and environs as a place to live, visit and work.

Tourism and Recreation Objectives

- *TR1 - To facilitate and support the development of the tourism industry in Arklow and maximise the town's location as a gateway between the tourism assets within Co. Wicklow.*

Heritage Objectives

- *HT2 - To protect the listed prospect of special amenity (from the R750/coast road towards the sea) from development that would either obstruct the prospect from the identified vantage point or form an obtrusive or incongruous feature in that prospect. Due regard will be paid in assessing development applications to the span and scope of the prospect and the location of the development within that prospect.*

- *HT3 - Protect and enhance the character, setting and environmental quality of natural, architectural and archaeological heritage, and in particular those features of the natural landscape and built structures that contribute to its special interest. The natural, architectural and archaeological heritage of the area shall be protected in accordance with the objectives set out in the Wicklow County Development Plan.*

- *HT9 - To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites in Arklow and Environs.*

9.49 It is considered that the Proposed Development complies with, and will make a positive contribution towards the abovementioned objectives of the LAP. A detailed assessment has been provided within the preceding section in respect of the WCDP objectives, which address the abovementioned objectives within the LAP and have not been repeated to avoid duplication. Please refer to the section above in respect of employment/economy, infrastructure, heritage, climate change and tourism.

9.50 WCC is currently preparing a Draft Arklow Local Planning Framework (LPF) 2025-2031, which will replace the existing Arklow and Environs Local Area Plan 2018-2024 above. The LPF will form part of the WCDP and is being incorporated by way of Proposed Variation No.5 to the WCDP. The purpose of the variation is to integrate the Arklow Local Planning Framework into the WCDP and ensure consistency between the settlement -level framework and the wider strategic policies of the WDCP.

9.51 Pre-draft public and stakeholder consultation took place during 2024 and early 2025, and submissions were invited from 1st October 2025 to 12th November 2025 to inform preparation of the draft framework and will be adopted through the statutory variation process stipulated under the Planning and Development Act.

9.52 The draft Arklow LPF identifies that Arklow occupies a defined strategic role in the County settlement hierarchy as a Level 3 Self-Sustaining Growth Town, meaning it is intended to accommodate population growth, employment creation and economic development which is increasingly integrated to the LPF's response to climate change, remaining consistent with national and regional planning policy.

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

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.'

Service Infrastructure Strategy for Arklow seeks to:

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

9.54 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.

9.55 The Proposed Development is consistent with the Draft Arklow Local Planning Framework. It supports the Economic Development and Employment Strategy and the Service Infrastructure Strategy by facilitating renewable energy and low-carbon economic activity, supports Arklow's designation as a Decarbonisation Zone, and reflects the planned role of offshore renewable energy within SLO2 and the town's future growth and economic function.

Wexford County Development Plan 2022-2028

Introduction

9.56 The Wexford County Development Plan 2022-2028 (WxCDP) sets out the overall strategy for the proper planning and sustainable development of County Wexford for the plan period and beyond. The Plan came into effect on Monday, 25th July 2022.

9.57 The Plan addresses a wide range of interrelated economic, social and environmental issues set within an overall framework of achieving sustainable development, social inclusion, adapting to climate change and a healthy county where everyone can enjoy physical and mental health and wellbeing to their full potential.

9.58 The Plan seeks to protect, mitigate and adapt to the impacts of climate change and notes that '*Climate action is integrated into every chapter and strategy in the plan. Each chapter includes a sub-section outlining how the spatial strategy and objectives of that chapter have been climate proofed and/or will contribute to mitigation and adaptation to climate change*'.

Core Strategy

9.59 The overarching strategic vision for the County is set out in Section 3.1 of the WxCDP, and is reproduced below:

'By 2028 County Wexford will:

- *Be a self-sustaining, low carbon, climate resilient and healthy county where people want to live, work and play.*
- *Offer high quality sustainable employment opportunities and high-quality residential developments.*
- *Have sustainable urban and rural environments supported by excellent physical and social infrastructure.*
- *Continue to value its unique natural environment, built and cultural heritage, be a county where biodiversity is restored and flourishes and which offers a range of high- quality experiences to both residents and visitors.'*

9.60 The Proposed Development is aligned with this overarching strategic vision as it supports the move towards a 'low carbon' county while delivering employment opportunities and minimising impacts on the natural environment, built and cultural heritage. .

Applicable Chapters and Objectives

9.61 The following Chapters of the WxCDP contain objectives which are relevant for the assessment of the Proposed Development:

- Chapter 2 - Climate Change
- Chapter 6 - Economic Development Strategy
- Chapter 7 – Tourism Development
- Chapter 9 - Infrastructure Strategy
- Chapter 10 - Environmental Management
- Chapter 11 - Landscape and Green Infrastructure
- Chapter 12 - Coastal Zone Management & Marine Spatial Planning
- Chapter 13 - Heritage and Conservation

9.62 The following sections of this Report outline the relevant objectives and accompanying background/contextual text contained in each applicable Chapter and then assesses the Proposed Development against the relevant objectives.

9.63 'Chapter 9 – Infrastructure Strategy' and 'Chapter 12 - Coastal Zone Management and Marine Spatial Planning' of the WxCDP are of particular relevance to the Proposed Development.

Climate Action

9.64 Chapter 2 of the WxCDP relates to climate action addressing the impacts of climate change at a local level. This Chapter recognises that Wexford has been at the forefront of renewable energy development having a Wind Energy Strategy in place since 2007 and has (at the time of writing the WxCDP) has made a significant contribution to the states installed renewable energy capacity (182MW).

9.65 The WxCDP states that climate change has been an underlying theme in the County Development Plan and Local Area Plans in Wexford and notes that '*Climate mitigation refers to efforts to reduce or prevent emission of greenhouse gases. Mitigation can mean using new technologies* ***and renewable energies****, making older equipment more energy efficient, or changing practices and behaviours e.g. encouraging more walking and cycling by providing footpaths and cycle paths*' [**our emphasis**].

9.66 The overarching goal of this Chapter is to '…*protect the people, buildings, infrastructure, businesses and ecosystems in County Wexford against the negative impacts of climate change, build resilience to climate change, change our behaviours and patterns of development to lessen the extent of climate change and take advantage of any opportunities that climate change may bring*.'

9.67 The WxCDP '…is *focused on reducing GHG emissions, using sustainable renewable energy sources and moving to a low carbon economy*' and in this regard the WXCDP seeks to '…***facilitate the transition to a low carbon economy*** *which is focused on clean, low carbon technologies and* ***promote the development of sustainable renewable energy sources such as wind****, tidal and solar energy as a means of reducing dependencies on fossil fuels*…' [**our emphasis**].

9.68 The WxCDP sets out the following 'Climate Action' objectives which support the Proposed Development:

- ***CA01****: To ensure that the spatial planning of County Wexford provides for a county that is resilient to climate change, encourages development along existing transport corridors, enables the decarbonisation of the county's economy and reduces the county's carbon footprint in support of national targets for climate mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions.*

- ***CA04:*** *To implement the Energy Strategy contained in Volume 10 of the Wexford County Development Plan to facilitate the transition to a low carbon county.*

- ***CA06****: To continue to reduce energy related CO_2 emissions of Wexford County Council, to improve energy efficiencies and to achieve the commitment under the*

European Climate Alliance to reduce greenhouse gas emissions by 10% every five years.

- ***CA13**: To require new developments to mitigate and adapt to the impacts of climate change by ensuring they are appropriately located, sited and designed to accommodate predicted future climate change impacts.*

Consideration: The Proposed Development supports the climate action objectives of the WxCDP by facilitating the delivery of large-scale offshore renewable energy and contributing to the decarbonisation of the electricity system in line with national climate targets and CA04. The EIAR confirms that the Proposed Development will result in a significant net climate benefit over its operational lifetime through the displacement of fossil fuel generation. The location and design of the offshore infrastructure have had regard to future climate conditions and climate vulnerability, supporting climate resilience (Refer to Volume III, Appendix 20.1: Climate Change Risk Assessment (RFI March 2026). Accordingly, taking account of the conclusions of the EIAR and the associated public benefits of emissions reduction and energy security, and the support provided by the Energy Strategy contained in Volume 10 of the WxCDP, the Proposed Development complies with objectives CA01, CA04, CA06 and CA13.

Tourism Development

9.69 Chapter 7 of the WxCDP sets out the spatial planning strategy and objectives to guide and facilitate the development of a sustainable tourism industry in the county. While the Council supports tourism as a key pillar of economic growth, it also recognises the need to protect and manage tourism assets and resources to ensure long-term sustainability and to ensure that new tourism developments respect, respond to and enhance their physical setting, environmental quality and local communities.

9.70 The WxCDP confirms that, as planning authority, the Council must ensure that public and private tourism and related developments accord with the proper planning and sustainable development of the county, including considerations relating to location, scale, siting, access, design and the protection of the environment, heritage and the amenity of host communities.

9.71 Chapter 7 also highlights the link between climate action and tourism, including directing coastal tourism development away from areas at risk of coastal flooding and erosion, ensuring water-compatible development in flood risk areas and working with relevant State bodies to protect natural, built and cultural heritage assets and water resources.

9.72 Section 7.5.3 of Chapter 7 specifically emphasises '**a <u>need to achieve a balance</u>** between appropriate tourism developments and economic, environmental and social sustainability. [**Our Emphasis**].

9.73 **T**he WxCDP sets out the following 'Tourism' objectives which are relevant to the Proposed Development:

- ***TM01:*** To protect and sustain the natural, built and cultural features that form the basis of the county's tourism industry including landscapes, historic

buildings and structures, habitats, species and areas of natural heritage value and water quality.

- ***TM09:*** To deliver the Ireland's Ancient East Programme and facilitate the phased rollout of the branding strategy, orientation signage and the enhancement of the visitor experience at the chosen programme sites.

Consideration: The potential effects of the Proposed Development on tourism have been assessed in the EIAR. Volume II, Chapter 21: Population and Human Health (Revised March 2026) assesses socio-economic receptors, including tourism and recreation, and considers potential implications for tourism assets, visitor experience and amenity receptors within the Local Area of County Wicklow and County Wexford.

In respect of County Wexford, the assessment includes coastal tourism receptors within the potential visual influence of the Proposed Development, including Courtown and the surrounding North Wexford coastline, associated beaches, caravan and holiday parks, coastal walking routes, sailing and water-based recreation and visitor attractions such as Courtown Harbour Beach, Curracloe Beach, Hook Lighthouse, Johnstown Castle Estate, Irish National Heritage Park, Tintern Abbey, Dunbrody Famine Ship, Enniscorthy Castle and Duncannon Fort Visitor Centre. The tourism economy of the Local Area is assessed as having medium sensitivity with a negligible magnitude of impact across construction, operational and decommissioning phases, resulting in effects that are not significant in EIA terms.

The SLVIA within Chapter 17 of Volume II of the EIAR (Revised March 2026), identifies significant visual effects at certain coastal viewpoints along the County Wexford coastline, including Courtown Harbour Beach, Cahore Beach, Curracloe Beach and Newcastle Beach. However, these effects relate to changes in views only and do not involve any loss of access to tourism assets, deterioration of environmental quality or impacts on tourism infrastructure. A Cultural Heritage Visual Impact Assessment (Volume III, Appendix 18.2: Cultural Heritage Visual Impact Assessment Report (Revised March 2026) similarly concludes that while turbines may be visible from certain locations, the effects are indirect and do not detract from the ability to understand or appreciate the significance of heritage assets.

The Proposed Development is located approximately 6–15km offshore and will not result in the loss, fragmentation or physical alteration of beaches, coastal walkways, heritage sites, recreational facilities or visitor attractions. Volume II of the EIAR further assesses coastal processes (Chapter 6), marine water quality (Chapter 7), biodiversity (Chapters 9–14), cultural heritage (Chapter 18) , seascape, landscape and visual effects (Chapter 17) and population and human health including tourism economy (Chapter 21), and concludes that following the implementation of mitigation measures the Proposed Development will not give rise to significant adverse effects on these receptors. Accordingly, the natural, built and cultural assets which underpin the tourism industry are not materially affected.

Objective TM09 relates to delivery of the Ireland's Ancient East programme and associated visitor infrastructure. Whilst it is not directly applicable to the Proposed Development, the EIAR concludes that the Proposed Development will not adversely

affect tourism or heritage assets associated with the Ireland's Ancient East visitor experience.

The Proposed Development complies with Objectives TM01 and TM09 of the Wexford County Development Plan.

Economic Development Strategy

9.74 Chapter 6 of the WxCDP sets out the Council's broad Economic Development Strategy and provides details on how this will be supported by the Council's functions and activities and the planning process.

9.75 The WxCDP notes that '*Technological advances and the transition to a low carbon economy present challenges but also numerous opportunities as our businesses and workers adapt in a changed economy*.'

9.76 The WxCDP advises that Wexford County Council will '*Support the development of the green economy including appropriate renewable energy and bioenergy economic developments that will assist in reducing greenhouse gas emissions and assist with the transition to a low carbon economy*.'

9.77 The following 'Economic Development Strategy' objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

- ***ED03:*** *To sustainably develop, deepen and enhance the county's regional economic resilience by widening economic sectors and boosting innovation, export diversification, and productivity and increasing access to new markets.*

- ***ED34:*** *To facilitate the development of enterprises related to the identified pillars for growth at appropriate locations and facilitate the provision of facilities and infrastructure which will enable clustering and specialisation in the county as set out in Section 6.7 (locations for economic development).*

- ***ED77:*** To support the role of ports, where appropriate, in facilitating the sustainable development and operation of off-shore renewable energy development, and to support sustainable and enabling infrastructure development to harness marine wealth including grid, pier and port facilities to support renewable energy and export potential.

- ***ED78:*** To ensure that any economic activity which utilises the marine resource shall have regard to compliance with the Marine Strategy Framework Directive which requires achieving and maintaining 'Good' Environmental Status of coastal and marine waters.

- ***ED85:*** To develop the county as a leading innovator in the green economy in areas such as sustainable agriculture, sustainable construction, the production of renewable energy and the bio-economy, and to support development of

enterprises and technologies that employ green technologies and support a low carbon economy.

Consideration: The Proposed Development complies with ED03 and ED34 as it will: support the strengthening and broadening of Wexford's economic base, enable opportunities for economic growth; help to create a more sustainable economy; and deliver a new renewable offshore wind energy development at an appropriate location to support a number of Wexford's 'Pillars of Growth' including 'Sustainable Construction and Energy' and 'Maritime and Coastal'.

The socio-economic assessment contained in Volume II, Chapter 21: Population and Human Health (Revised March 2026) and the associated Supplementary Socio-Economic Analysis (Volume III, Appendix 21.2: Supplementary Socio-economic Analysis (RFI March 2026) identifies positive employment, supply chain and investment effects associated with the construction and operation of the Proposed Development, contributing to regional economic resilience and innovation in the renewable energy sector.

Objective ED77 supports the role of ports and associated infrastructure in facilitating offshore renewable energy development and the harnessing of marine resources. Including sustainable and enabling infrastructure such as grid, pier and port facilities to support renewable energy and export potential. While the Proposed Development does not include new port infrastructure, it comprises offshore wind generation infrastructure and will utilise existing port facilities during construction and operational phases. The Proposed Development will contribute to the generation of renewable energy which will rely on such enabling infrastructure to support the export of electricity consistent with the intent of ED77 to support renewable energy and marine -related economic activity. In this regard, the Proposed Development does not conflict with ED77 as it supports the sustainable development and operation of offshore renewable energy and will contribute to marine-related economic activity and the broader Blue Economy.

Objective ED78 requires that economic activity utilising the marine resource demonstrates compliance with the Marine Strategy Framework Directive (MSFD) and the achievement of Good Environmental Status. Volume II of the EIAR includes detailed assessments of coastal processes (Chapter 6), marine water and sediment quality (Chapter 7), and marine ecology (Chapters 9–14). In addition, a Marine Strategy Framework Directive Assessment (Refer to Annex 2) has been undertaken. These assessments conclude that the Proposed Development will not result in deterioration of marine waters or hinder the achievement of Good Environmental Status. Predicted changes to tidal flows, sediment movement and water quality are localised and small in scale and will not extend to the wider marine environment.

Objective ED85 seeks to develop the county as a leading innovator in the green economy and to support renewable energy and low-carbon technologies. The Proposed Development contributes directly to the transition to a low-carbon economy. As outlined in Volume II, Chapter 21: Population and Human Health (Revised March 2026), the Proposed Development will support employment, supply-chain

development and investment associated with the renewable energy sector and therefore aligns with and supports ED85.

The Proposed Development is consistent with the intent of Economic Development Strategy Objectives ED03, ED34, ED77, ED78 and ED85 of the WxDCP.

Infrastructure Strategy

9.78 Chapter 9 of the WxCDP provides the spatial framework and objectives for the planning and provision of infrastructure, either directly by the Council, or by other agencies or operators.

9.79 The overarching goal of this Chapter is to '*…ensure that Wexford has high quality infrastructure to facilitate and sustain the growth of the county over the lifetime of the plan and beyond whilst having regard to, and complying with, all relevant EU Directive and national legislation and enhancing the environmental quality of the county*.'

9.80 The following 'Infrastructure Strategy' objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

- ***IS06****: To promote the circular economy and facilitate best practice in the prevention, re-use, recovery, recycling and disposal of all waste produced in the county.*

- ***WM01:*** *To sustainably manage waste generation, support the investment in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a sustainable and healthy environment, economy and society.*

- ***WM09****: Construction and Demolition Waste Management Plans will be required for developments specified in Volume 2 Development Management Manual or as otherwise may be requested by the Planning Authority.*

- ***WM15:*** *To require the appropriate provision for the management of waste within developments, including the provision of facilities for the storage, separation and collection of such waste in accordance with the relevant development management standards set out in Volume 2*

Consideration: In compliance with objectives IS06, WM01, WM09 and WM15, a Resource and Waste Management Plan has been submitted with the Application (see Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026), Annex 5, Revised March 2026). 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 across the construction, operational and maintenance and decommissioning phases. 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 and circular economy principles.

9.81 Section 9.12 of Chapter 9 addresses electricity transmission infrastructure and supports the reinforcement of the national electricity grid to improve energy supply. The following 'Power Transmission' objectives are relevant to the Proposed Development:

- ***PT01:*** To facilitate the provision of and improvements to energy networks in principle, provided that it can be demonstrated that:
    - The development is required in order to facilitate the provision or retention of significant economic or social infrastructure.
    - The route proposed has been identified with due consideration for social, environmental and cultural impacts.
    - The design is such that will achieve the least environmental impact consistent with not incurring excessive cost.
    - Where impacts are inevitable, mitigation features have been included.
    - Proposals for energy infrastructure should be assessed in accordance with the requirements of Article 6 of the Habitats Directive.
- ***PT02:*** To support, subject to the objectives of this section and Volume 10 Energy Strategy, connecting infrastructure for the integration of low carbon and renewable energy generation projects including community scaled projects with power transmission infrastructure.
- ***PT03***: To support the upgrading of existing electricity networks and the reuse of existing power line routes.
- ***PT04:*** To support the upgrade of existing and development of new electricity substations in locations that do not have a significant negative impact on nearby residents and are subject to landscaping screening.

Consideration: Power Transmission Objectives PT01–PT04 of the Wexford County Development Plan primarily relate to the routing, design and siting of land-based electricity transmission and distribution infrastructure within the functional area of the planning authority. This application relates to the offshore components of the Proposed Development located within the maritime area. Section 2 of this Planning Report outlines the existing infrastructure which has planning permission to support the Proposed Development.

The Proposed Development has been assessed against these objectives insofar as they relate to the Proposed Development. PT01 concerns the routing and design of electricity infrastructure. The offshore array layout and cable routing have been identified through an iterative design process which has taken account of environmental, social and cultural constraints, as assessed in Volume II of the EIAR in Chapter 6 (Coastal Processes), Chapter 7 (Marine Water and Sediment Quality), Chapter 8 (Airborne Noise), Chapter 17 (Seascape, Landscape and Visual Impact Assessment) and Chapter 18 (Marine Archaeology and Cultural Heritage). This process has sought to achieve the least environmental impact consistent with technical and

commercial viability, with factored-in measures incorporated where effects are identified.

Objective PT02 relates to infrastructure connecting renewable energy generation to the electricity transmission network. The Proposed Development comprises offshore renewable electricity generation infrastructure, which will contribute to the integration of low-carbon energy into the national electricity network, consistent with the intent of this objective. PT03, which supports the upgrading and strengthening of electricity networks, is similarly supported through the contribution the Proposed Development will make to renewable electricity supply within the national grid.

Objective PT04 concerns the siting and screening of land-based electricity substations to avoid adverse impacts on nearby residents. No onshore substations form part of the current application. Potential visual and amenity effects associated with offshore infrastructure have been assessed in Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) and Volume II, Chapter 21: Population and Human Health (Revised March 2026), which conclude that no significant adverse residential amenity effects will arise.

The Proposed Development is consistent with Objectives PT01–PT04 of the WxCDP.

Environmental Management

9.82 Chapter 10 of the WxCDP sets out, from a spatial planning perspective, the framework to sustainably manage our environment by ensuring that land use and future developments protect and enhance, where possible, environmental quality and contribute to the health and wellbeing of our county.

9.83 With respect to the environment, the WxCDP notes that climate action in the Plan includes a focus on '*Promoting renewable energy and green industries to reduce GHGs and improve air quality*.'

9.84 The overarching goal of this Chapter is to '*ensure that the natural resources and environmental conditions that are fundamental for the social and economic wellbeing of the current and future generations of our county are sustainably managed and protected*.'

9.85 The following 'Environmental Management' objectives are relevant with respect to the assessment of the Proposed Development and have been considered in its siting and design:

- ***EM01:*** *To ensure that proposed projects/developments comply with the requirements of EIA Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014, amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment, and as transposed into Irish law under national legislation, including in Schedule 5 Part 1 and Part 2 of the Planning and Development Regulations 2001 (as amended). In accordance with Article 3 of Directive 2014/52/ EU, where EIA is required the environmental impact assessments presented in the Environmental Impact*

Assessment Report (EIAR) shall identify, describe and assess in an appropriate manner, the direct, indirect and cumulative significant effects of a project on the following factors: population and human health; biodiversity (with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC); land, soil, water, air and climate, material assets, cultural heritage, and the landscape, and the interaction between the foregoing factors.

- ***EM02:*** *To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, will not have a significant effect on a European site, or where such a development proposal is likely or might have such a significant effect (either alone or in combination), the planning authority will, as required by law, carry out an 442 Environmental Management WxCDP 2022 - 2028 appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation. Objective EM03 To ensure that proposed plans and programmes comply with the requirements of the SEA Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, as transposed into Irish law under national legislation.*

- ***EM05****: To implement the provisions of EU and National legislation and other relevant legislative requirements on protecting and improving surface and ground water quality, air quality and climate, and on reducing adverse noise and light nuisance, as appropriate and in conjunction with all relevant stakeholders in the interests of the protection of the environment, public health and the sustainable development of the county.*

Consideration: An EIAR has been submitted with the Application for the Proposed Development. This assesses 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 March 2026), 11 Marine Mammals (Revised March 2026), 12 Offshore Ornithology (Revised March 2026),and 13 Offshore Bats (Revised March 2026). The EIAR has been prepared in accordance with the requirements of the EIA Directive 2014/52/EU, as transposed into Irish Legislation, and identifies, describes and assesses the likely significant direct, indirect and cumulative effects of the proposed development on relevant environmental factors in accordance with objective EM01.

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 Factored-in 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).

The updated EIAR concludes that no significant effects are predicted on biodiversity receptors. It is unlikely the population abundance of the species will be adversely affected due to the Proposed Development, such that the populations long-term viability of relevant populations will be ensured. The Proposed Development is also committed to participating in the 'East Coast Monitoring Group' (ECMG), to discuss and agree potential strategic monitoring initiatives in relation to offshore ecology.

In light of the conclusions of the EIAR for all biodiversity-related topics, no additional mitigation is required in relation to impacts on species adaptation or migration or natural native habitat connectivity. Following the application of the factored-in measures, no significant adverse effect on species adaptation, migration or habitat connectivity are predicted.

A Natura Impact Statement (NIS) (Revised March 2026) has been submitted with the Application to inform the Stage 2 Appropriate Assessment under Article 6 (3) of the Habitats Directive. The NIS concludes that there will be no adverse effects on the integrity of any European sites either alone or in combination with other plans or projects, thereby addressing Objective EM02.

Therefore, taking account of the conclusions within the EIAR and NIS, and the proposed monitoring commitments through the ECMG, and having regard to the biodiversity, water quality as discussed below and related environmental receptors, the development complies with relevant EU and national environmental legislation and provides for the protection of environmental quality and public health in accordance with the Development Plan. Furthermore, there is overarching strategic and statutory policy support for the Proposed Development along with the need for it, and its associated socio-economic benefits. The Proposed Development complies with EM01, EM02 and EM05.

Water Quality

- ***WQ01****: To protect existing and potential water resources for the county, in accordance with the EU Water Framework Directive (2000/60/EC), Bathing Water Directive (2006/7/ EC), the National River Basin Management Plan 2018-2021 and any updated version, the Pollution Reduction Programmes for designated shellfish waters, the provisions of a Groundwater Protection Scheme for the county and any other protection plans for water supply sources, with an aim to improving all water quality.*

- ***WQ05:*** *To strive to achieve and maintain at least 'Good' status except where more stringent obligations are required, and no deterioration of status for all water bodies including protected areas, under the Marine Strategy Framework*

and its programme of measures, the Water Framework Directive and the River Basin Management Plan.

- ***WQ08**: To achieve compliance with the objectives and standards under which the individual protected areas have been established.*

- ***WQ15:** To ensure that development permitted would not negatively impact on water quality and quantity, including surface water, ground water, designated source protection areas, river corridors and associated wetlands, estuarine waters, coastal and transitional waters.*

Consideration: Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) considers the potential changes in marine water and sediment quality as a result of the Proposed Development during the construction, operation and maintenance and decommissioning phases of the Proposed Development.

Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) concludes that following the implementation of factored in measures, including an Environmental Management Plan (EMP) and Marine Pollution Contingency Plan (MPCP) (Volume III, Appendix 25.1), effects on marine water and sediment quality would be imperceptible to minor and not significant in EIA terms, with no deterioration in status predicted on designated coastal, transitional, and bathing waters for all phases of the Proposed Development.

The WFD Assessment (Volume III, Appendix 7.1: Water Framework Directive Assessment (Revised March 2026)) confirms that the activities associated with the Proposed Development are not considered to hinder the achievement of 'Good Environmental Status', as prescribed under the water quality policies. The Proposed Development will not result in a deterioration of the current status of the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea - Killiney Bay (HA 10) coastal water bodies or any other protected WFD waterbodies, nor jeopardise the attainment of 'Good' status.

Therefore, it is considered that the Proposed Development complies with objectives WQ01, WQ05, WQ08 and WQ15.

Air Quality

- ***AQ01**: To have regard to the Air Quality Standards Regulation 2011 (S.I. No. 180 of 2011) when assessing planning applications for development which may have effects on air quality.*

- ***AQ04**: To require the submission of measures to prevent and reduce dust and airborne particulate emissions for activities that may have a negative effect on air quality.*

Consideration: Volume II, Chapter 20: Air Quality and Climate (Revised March 2026) assesses the potential impacts of the Proposed Development with respect to air quality and climate. Chapter 20 concludes that there will be a slight adverse effect (which is not deemed significant in EIA terms) during the construction and

decommissioning phases and a negligible effect(not significant in EIA terms) during the operational phase of the Proposed Development with respect to air quality.

Volume II, Chapter 20: Air Quality and Climate (Revised March 2026) also confirms that there will be a major beneficial impact (significant in EIA terms) in respect of climate mitigation arising from the Proposed Development during the operational phase, due to the displacement of fossil fuel-based electricity generation, and associated net beneficial impact on climate at a local, national and global basis over the project lifecycle.

Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026) is also submitted with the Application to ensure that the construction and decommissioning phases will meet relevant construction and operational standards.

Although Air Quality Standards Regulation 2011 (S.I. No. 180 of 2011) is no longer in force, the assessment carried out in Volume II, Chapter 20: Air Quality and Climate (Revised March 2026) is compliant with the relevant legislation and guidance, thereby enabling the relevant authority to carry out the requisite assessment. As such, the Proposed Development is consistent with the overall objective of AQ01 and AQ04.

Noise

- ***N01:*** *To promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Actions Plans.*

- ***N02:*** *To have regard to the provisions of the Environmental Protection Agency (EPA) Acts 1992 and 2003 and the Environmental Protection Agency Act (Noise) Regulations 1994 when assessing planning applications.*

- ***N06:*** *To ensure new development does not cause an unacceptable increase in noise levels affecting noise sensitive properties. Proposals for new development with the potential to create excessive noise will be required to be accompanied by a construction and/or operation management plan to control such emissions.*

- ***N08:*** *To require activities likely to give rise to excessive noise to install noise mitigation measures and monitors. The provision of a noise audit may be required where appropriate.*

- ***N12:*** *To ensure that future developments are designed and constructed in accordance with best practice to minimise noise disturbances through good acoustic design.*

Consideration: The EIAR submitted with the Application (as updated in response to the Request for Further Information) confirms that the Proposed Development will not result in significant effects with respect to noise. A Construction Noise Management Plan is submitted along with the Application. Please refer to Volume II of the EIAR for further details, particularly Chapter 8 - Airborne Noise (Revised March 2026), Chapter 11 - Marine Mammals (Revised March 2026) in Volume III, Appendix 8.1 - Airborne Noise Technical Report (Revised March 2026), Appendix 11.2 - Underwater Noise

Assessment (Revised March 2026) and Appendix 25.8 - Construction Noise Management Plan (Revised March 2026). The Proposed Development therefore complies with N06, N08 and N12. N01 and N02 relate to local authority actions but the Proposed Development is aligned with these objectives insofar as it minimises its potential noise impacts.

External Lighting

- ***EL01****: To require developments providing external lighting to clearly demonstrate that the lighting scheme is the minimum needed for security and working purposes.*

- ***EL02****: To ensure that external lighting and lighting schemes are designed so that light spillage is minimised thereby protecting the amenities of nearby properties and wildlife, including protected species.*

Consideration: The amended project design has informed the assessment of lighting effects and the preparation of Volume III, Appendix 25.6: Lighting and Marking Plan (Revised March 2026) which sets out the proposed aviation and marine lighting required for navigational safety and aviation safety in accordance with applicable standards and stakeholder requirements.

Volume II, Chapter 17 Seascape, Landscape and Visual Impact Assessment (Revised March 2026) assesses the night time visual effects associated with aviation lighting and identifies significant adverse effects at a limited number of representative viewpoints. However, the proposed aviation lighting is a mandatory safety requirement to comply with the Irish Aviation Authority and other relevant aviation and marine navigation requirements.

The LMP has been informed by consultation with the Irish Aviation Authority, Department of Defence, Commission of Irish Lights, Marine Survey Office and the Irish Coastguard and is designed in accordance with the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) guidance. Lighting is designed to minimise light spill where practicable, including the use of baffled fittings where required under the agreed aviation lighting specification. It is also important to note that the Department of Defence has requested the provision of medium intensity flashing red aviation obstacle lighting on turbines, the final specification of which will be agreed with the competent authorities.

In compliance with EL01, the Proposed Development will provide lighting only where required for aviation safety, maritime navigation and safe operation and maintenance activities. The lighting design has been developed in accordance with the relevant aviation and maritime safety guidance and is limited to the minimum specification necessary to meet health, safety and navigational requirements. This includes the use of directional and baffled lighting to minimise light spill and avoid illumination below the horizontal where practicable, thereby ensuring safe operation while reducing potential effects on the surrounding environment.

In compliance with EL02, the impact of the proposed lighting on wildlife, including protected species, and the amenities of nearby properties has been assessed in the EIAR, which demonstrates that adverse significant effects will be avoided.

Taking account of the above, the conclusions within the EIAR and the updated SLVIA, the mandatory safety requirements governing offshore wind developments, and the overarching strategic and statutory policy support for the Proposed Development along with the need for it, and its associated public benefits, the Proposed Development complies with EL01 and EL02.

Landscape and Green Infrastructure

9.86 Chapter 11 of the WxCDP sets out the spatial framework and objectives with respect to landscape and green infrastructure.

9.87 The overarching goal of this Chapter is to '*protect the inherent beauty of our landscape and to promote and enable appreciation and enjoyment of the County's landscapes and to protect, restore and enhance the County's green infrastructure and biodiversity for the benefit of all*.'

9.88 The WxCDP advises that the landscape strategy is:

- *To protect the inherent characteristics and quality of our landscape both in their own right and for the economic benefits derived from them.*
- *To sustain the natural and cultural heritage of our landscapes while respecting that it is a changing landscape.*
- *To ensure that development is respectful and appropriate to its landscape context.*
- *To promote enjoyment and appreciation of our landscapes.*
- *To protect the elements of our landscapes which perform important functions such as regulating floods, carbon sinks, green infrastructure and ecosystem services.*

9.89 Importantly, the Plan recognises the fact that '*…all landscapes are living and changing, and therefore in principle a development on such a route would not necessarily be prohibited',* however, the Plan also notes that *'…development, where permitted, should not hinder or obstruct these views and prospects, should not have significant negative impacts either individually or cumulatively and should be designed and located to minimise their impact*'.

9.90 This Chapter confirms support for '*…appropriate renewable energy developments in appropriate landscapes that will assist in reducing greenhouse gas emissions*.'

9.91 The following landscape objectives are of note with respect to the assessment of the Proposed Development, and have been considered in its siting and design:

- ***L01:*** *To have regard to the Landscape Character Units and their assigned Landscape Sensitivity, the Draft Landscape and Landscape Assessment-Guidelines for Planning Authorities (2000) and any updated versions of these guidelines published during the lifetime of the Plan, and any National Landscape Character*

Assessment prepared when assessing planning applications or when carrying out local authority own development.

- ***L04:*** *To require all developments to be appropriately sited, designed and landscaped having regard to their setting in the landscape, ensure that any potential adverse visual impacts are minimised and that natural features and characteristics of the site are retained.*

- ***L06:*** *To ensure that developments are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the Upland, River Valley, Coastal or Distinctive Landscape Character Units.*

- ***L11:*** *To protect views worthy of protection, including views to and from the sea, rivers, landscape features, mountains, tourism sites and landmark structures such as bridges and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views.*

- ***L16****: To require Landscape and Visual Impact Assessment Reports to be submitted for developments which may have a significant negative impact on the landscape.*

Consideration: An updated Seascape, Landscape and Visual Impact Assessment (SLVIA) has been prepared as part of the RFI response for the Proposed Development and is presented in Volume II, Chapter 17 Seascape, Landscape and Visual Impact Assessment (Revised March 2026) in accordance with objective L16. The SLVIA assesses potential seascape, landscape, landscape designation and visual effects arising during the construction, operational and maintenance, and decommissioning phases of the Proposed Development, within the identified Zone of Theoretical Visibility. The SLVIA adopts the relevant Landscape Character Units and their assigned landscape sensitivity as the landscape baseline framework, having regard to the Landscape and Landscape Assessment Guidelines for Planning Authorities (2000), and evaluates the likely effects of the Proposed Development on coastal and wider landscape character, including views to and from the sea and other sensitive receptors. The siting, design and layout of the Proposed Development seeks to minimise potential adverse visual effects, in accordance with Objectives L01, L04 and L06.

The updated SLVIA concludes that the Proposed Development would give rise to significant adverse seascape, landscape and visual effects, particularly for coastal and near-coastal receptors. Significant effects are identified at a range of viewpoints and receptors in closest proximity to the Array Area, with the magnitude of effects diminishing with distance offshore and inland. The SLVIA indicates that these effects are most pronounced during the operational phase and represent long-term changes to seascape, landscape character and views, consistent with the scale and nature of offshore wind energy development. Virtually all nationally significant offshore wind farm development projects will have adverse effects on the landscape, however the project has been sited and designed carefully, taking account of the potential impact on the landscape.The WxCDP landscape objectives require landscape and visual effects to be assessed and minimised through siting and design but do not preclude

development where the effects are appropriately assessed and any mitigation incorporated to ensure that any potential adverse visual impacts are minimised and that natural features and characteristics of the site are retained. These objectives must be read together with wider policy support for renewable energy development and climate action.

In respect of listed views and prospects, the Proposed Development is located offshore and would be viewed across an expansive seascape. The turbines would be visible within the relevant views and prospects but would not obstruct the principal coastal or horizon views from identified vantage points, with wider panoramas of the sea and coast being retained. When viewed within the relevant views and prospects, the Proposed Development would be experienced within a wide, open and large-scale seascape, which is already influenced by existing offshore wind development at the existing Arklow Bank Wind Park. the Proposed Development would not be seen as a new or unfamiliar feature in the views out to sea, given the operational presence of Arklow Bank Wind Park. In this regard, the Proposed Development may result in some significant adverse effects but would not block views worthy of protection, including views to the wider seascape around the Proposed Development and along the coastline, and the principal coastal and horizon views from identified vantage points would remain intact. The natural features and characteristics of the coastal landscape and seascape would therefore be retained, consistent with Objective L04 of the Wexford County Development Plan. However, the SLVIA does conclude that the Proposed Development will form a notable increase in the extent of offshore windfarm development readily visible across the seascape and result in high magnitude of change when viewed from the closest parts of the coast.

From the outset, the design of the Proposed Development has sought to minimise seascape, landscape and visual effects through careful consideration of turbine layout, spacing and associated infrastructure. The Proposed Development has subsequently been subject to design refinements in response to search and rescue requirements and ground conditions. These changes and improvements have resulted in incidental changes to the seascape, landscape and visual effects of the Proposed Development, although the overall conclusion on significant effects in the EIAR remains the same. This is due to the reduced number of turbines, in the case with Project Design Option 1, refinement of turbine layout and spacing in response to search, rescue and navigation safety requirements, the selection of turbine technology with a reduced chord width, careful siting of Offshore Substation Platforms, and the design and control of aviation and navigational lighting, from a SLVIA perspective, reduce the number of visible vertical elements, create a more ordered and less dense layout across the horizon, reduce blade visibility and reflectivity, and minimise night-time prominence.

The design also contributes to the Proposed Development being appropriately sited and designed, taking account of the potential impact on the landscape, so that it is not unduly visually obtrusive within the seascape and setting of Landscape Character Units, including coastal and distinctive landscape areas, and that protected views and prospects are not wholly blocked, with views of the wider seascape, coast, mountains and landmarks continuing to be experienced in the context of the Proposed Development, thereby addressing Objectives L06 and L11 of the WxCDP.

Mitigation measures are included to minimise the visual impact of the Proposed Development. These measures are set out in Volume II, Chapter 25: Summary of Factored in Measures, Mitigation and Monitoring (Revised March 2026) of the EIAR) and align with industry best practice and applicable guidelines. The turbine towers above the foundation level will be finished in a neutral grey colour to reduce visual contrast with the sky at distance. Aviation and marine navigation lighting and marking will be installed in accordance with applicable aviation and maritime safety requirements and implemented through Volume III, Appendix 25.6: Lighting and Marking Plan (Revised March 2026), with baffling applied where required so that light emitted below the horizontal is minimised. Further details of the factored-in measures, mitigation and monitoring measures are provided in Volume II, Chapter 25: Summary of Factored in Measures, Mitigation and Monitoring (Revised March 2026) of the EIAR.

Taking account of the conclusions of the SLVIA, the factored-in measures incorporated to reduce effects (as outlined above and in the EIAR), and the residual significant effects identified, the assessment of the Proposed Development, must be considered along with other material planning considerations and be weighed as part of the overall planning balance.

In this regard, the Proposed Development delivers offshore renewable energy that will contribute to the achievement of Ireland's statutory climate change and decarbonisation targets, enhancing security of electricity supply, and delivering significant socio-economic benefits at national, regional and local levels, as demonstrated within Chapter 21: Population and Human Health (Revised March 2026) and supporting appendices and outlined at Section 5 of this Planning Report.

The Proposed Development would provide approximately 0.8 GW of renewable electricity generation capacity and would make a material contribution toward national offshore wind delivery targets, with the EIAR confirming that electricity generated would displace fossil-fuel generation and result in measurable reductions in greenhouse gas emissions which would not otherwise occur. The development would also contribute to resilience of electricity supply through increased domestic renewable generation and reduced reliance on imported fuels, and would give rise to positive public benefits including employment creation, regional investment and positive Gross Value Added over the operational lifetime of the project.

The WxCDP itself contains policy support for renewable energy and climate action. In particular, Objective CA01 seeks to ensure that spatial planning in the County facilitates decarbonisation of the economy, reduces the County's carbon footprint and supports national climate mitigation and adaptation targets. Objective CA04 supports the implementation of the Energy Strategy to facilitate the transition to a low-carbon county, while Objective CA06 promotes reductions in energy related CO_2 emissions and improvements in energy efficiency. Objective CA13 requires new development to be appropriately located, sited and designed to mitigate and adapt to the impacts of climate change. These objectives sit alongside the landscape protection policies of the Development Plan. The assessment of the Proposed Development therefore requires a balanced judgement to be made between the promotion of renewable energy and climate action, which are supported by the strategic planning policy framework including the NPF and the protection of landscape and visual amenity interests.

The statutory climate objectives and the approved Climate Action Plan as part of the Climate Act must also be considered, with the decision is required to be consistent, as far as practicable, with climate objectives (as confirmed by the Supreme Court in Coolglass Wind Farm Limited v An Bord Pleanála[1] [2026] IESC 5).

Furthermore, having regard to the strategic government policy and statutory national policy support for offshore renewable energy, together with the WxCDP renewable energy objectives, the identified seascape, landscape and visual effects are outweighed by the contribution the Proposed Development will make to achieving climate change targets and the socio economic benefits of the Proposed Development. The Proposed Development therefore complies with WxCDP's overall goal, strategy and objectives L01, L04, L06, L11, L16 with respect to landscape.

Chapter 12 - Coastal Zone Management & Marine Spatial Planning

9.92 Chapter 12 of the WxCDP sets out the spatial planning framework for future development in the county's coastal areas.

9.93 The Plan states that 'Our *coastal areas are home to vibrant coastal communities, attractive coastal settlements, coastal landscapes and seascapes of intrinsic natural amenity value and a diverse range of coastal habitats, some of which are of international and national importance protected by conservation designations*.'

9.94 It recognises that '*These areas are also home to a variety of land uses including ports, harbours, fishing and aquaculture, tourism, leisure and amenity all of which make a valuable economic contribution to local communities and the county*.' However, the Plan advises that '*…these areas are facing many challenges with competing demands on limited resources. The pressures include vulnerability to the impacts of climate change, residential and holiday home development, balancing the demands of tourism with the need to protect the tourism product and protecting our coastal natural and cultural heritage*.'

9.95 The sea is identified as a '*…very important asset for the county and region, offering significant economic potential, particularly, in the areas of fishing and aquaculture, transport, shipping, tourism and offshore energy production'*.

9.96 Section 12.2 of the WxCDP confirms that Wexford County Council will '*Support appropriate renewable energy developments that will assist in reducing greenhouse gas emissions, including appropriate infrastructure to facilitate offshore renewable energy development in appropriate locations*.'

Coastal Zone Management Spatial Strategy

9.97 The WxCDP advises that the '*…policies and objectives of this chapter refer to the entire coastal area of our County. It includes the foreshore and the areas within any of our coastal towns and villages. It will also include the new nearshore once defined. The area to which these policies apply are not defined on a map'*.

9.98 The overarching goal for the coastal zone and maritime area is '*…to ensure that it is protected and managed to balance social, economic and environmental interests while allowing these areas to be used in a planned and sustainable manner.*'

9.99 The WxCDP sets out a number of ways the overarching goal will be achieved including '*adapting to and managing the challenges of climate change in coastal areas and the maritime area'* '*Implementing and managing the land/sea interactions and facilitating development which is environmentally, socially and economically sustainable, in the maritime area in accordance with the draft NMPF*' and '*Maximising the economic potential of the coastal and maritime areas and its resources in a sustainable manner*.', alongside other criteria's relating to coastal communities, collaboration and management, conservation and assets, preservation and enjoyment.

9.100 The following 'Coastal Zone Management Strategic Objectives' are of note with respect to the assessment of the Proposed Development, and have been considered in its siting and design:

- ***CZM01:*** *To ensure the sustainable development of the county's coastal areas and the maritime area for the long term benefit of coastal communities and the economic well-being of these areas and the county whilst protecting and enhancing environmental quality and managing and restoring biodiversity.*

- ***CZM03:*** *To maximise the economic development potential of the county's coastal and maritime areas subject to compliance with the objectives of the County Development Plan with regard to the location of economic development, the protection of the scenic amenity and views associated with coastal areas and the maritime area which is crucial to the tourism industry, the protection of the amenity, livelihood and cultural well-being of coastal communities, the protection and restoration of coastal features, habitats and species, compliance with the Habitats Directive and normal planning and environmental criteria and the proper planning and sustainable development of these areas.*

- ***CZM11****: To support the sustainable growth and development of the maritime area and the maritime economy in accordance with the objectives of this chapter and the relevant objectives in Chapter 6 Economic Development Strategy, Chapter 8 Transportation Strategy, Chapter 9 Infrastructure Strategy, Chapter 11 Landscape and Green Infrastructure, Chapter 13 Heritage and Conservation and Volume 10 Energy Strategy as referred to in Table 12-1 and subject to compliance with the Habitats Directive and the proper planning and sustainable development of the area.*

- ***CZM13:*** To support proposals that optimise the use of maritime space, including through consideration of opportunities for co-existence and co-operation with other activities and enhancing other activities where appropriate subject to compliance with the Habitats Directive.

- ***CZM14:*** *To support development in the coastal zone and maritime area that will facilitate a transition to a low carbon economy such as carbon capture and storage and renewable energy developments including offshore tidal and wind energy subject to compliance with Objective CZM46 and the proper planning and sustainable development of these areas.*

Consideration: The Proposed Development, by its very nature, i.e. a new renewable wind energy development, complies with the objectives CZM01, CZM03, CZM11 and

CZM14 as it will: facilitate a transition to a low carbon economy; ensure the sustainable development of the county's coastal areas and the maritime area; and maximise the economic development potential of the county's coastal and maritime areas. It is further noted that CZM14 makes specific reference to supporting offshore wind energy.

The environmental and socio-economic effects of the Proposed Development on the coastal and maritime environment have been assessed within Volume II of the EIAR, including Chapter 6 (Coastal Processes), Chapter 7 (Marine Water and Sediment Quality), Chapters 9–14 (Ecology across various topics), Chapter 17 (Seascape, Landscape and Visual Impact Assessment), Chapter 18 (Marine Archaeology and Cultural Heritage) and Chapter 21 (Population and Human Health). These assessments conclude that the Proposed Development will not give rise to significant adverse effects on coastal habitats, biodiversity, environmental quality, tourism assets or coastal communities.

The Marine Strategy Framework Directive Assessment (Annex 2) confirms that the Proposed Development will not hinder the achievement of Good Environmental Status, while the Ecosystem Functions and Services Assessment confirms that provisioning, regulating and cultural ecosystem services will not be significantly adversely affected.

In respect of CZM13, which supports the optimisation of maritime space and co-existence with other marine activities, the EIAR and supporting documentation assess interactions with navigation, fisheries and other marine users and conclude that the Proposed Development can co-exist with other maritime activities without significant adverse effects.

Noting the above, and having regard to the findings of the EIAR, Natura Impact Statement and supporting technical assessments, the Proposed Development is considered to be consistent with the intent of Coastal Zone Management Strategic Objectives CZM01, CZM03, CZM11, CZM13 and CZM14 of the WxCDP. Please also note the assessment undertaken in this Report in relation to the Chapters 6, 9, 11 and 13 and Volume 10 of the WxCDP.

Managing the Coastal Zone and Maritime Area

9.101 This Section of Chapter 12 sets out objectives relating to the coastal zone and the maritime area that need to be considered in all developments. The WxCDP advises that development proposals will be required to demonstrate compliance with these objectives, where relevant.

9.102 This Section of the WxCDP confirms that '*Offshore renewable energy has a key role to play in the transformation to a clean, low carbon system. It also minimises the amount of energy that has to be generated on land*' and that the Council will support offshore renewable energy developments.

9.103 The following 'Managing the Coastal Zone and Maritime Area General Objectives' are of note with respect to the assessment of the Proposed Development, and have been considered in its siting and design:

- ***CZM21:*** *To support proposals for new development or activities in coastal and maritime areas that enhance or promote social benefits for the local communities, and where considered necessary an applicant will be required to demonstrate that adverse impacts on local communities will be avoided, mitigated or minimised appropriately.*

Consideration: The Proposed Development is an offshore wind park, and while its purpose is to supply renewable energy to the community of Ireland, it does not constitute a 'community development' as defined in the WxCDP. Notwithstanding, it is noted that a community benefit fund of €3m per annum will be provided as part of the Proposed Development which is an important social benefit. Furthermore, the EIAR, including Volume II, Chapter 21:Population and Human Health (Revised March 2026) assesses the impacts of the Proposed Development on community-related factors such as population, economy, tourism and human health. The assessment, informed by an updated socio-economic analysis submitted in Volume III, Appendix 21.2: Supplementary Socio-economic Analysis (RFI March 2026) in response to the Request for Further Information, confirms that no significant adverse effects will occur on local communities.

The Proposed Development complies with CZM21.

- ***CZM28****: To support the development of updated national modelling of coastal erosion and in the absence of such adopt a precautionary approach to development in the coastal area.*

Consideration: Volume II, Chapter 6 - Coastal Processes (Revised March 2026) of the EIAR undertakes a detailed assessment with respect to this environmental factor. Indeed, Chapter 6 considers a wide range of potential changes to 'Coastal Processes', including short-term sediment disturbance due to construction activities and the potential for changes to the coast and sandbank systems, arising from the blockage of waves and tides.

Volume II, Chapter 6 - Coastal Processes (Revised March 2026) of the EIAR concludes, applying a precautionary assessment approach, that for all receptor groups, the level of effect significance is either Negligible or Low for all phases of development (see Table 6.40 and Table 6.41 of Volume II, Chapter 6 - Coastal Processes (Revised March 2026) of the EIAR). Accordingly, all of the potential effects to Coastal Process receptors are therefore considered Not Significant in EIA terms.

It is therefore considered that the Proposed Development complies with CZM28.

- ***CZM40****: To protect the environmental quality of our coastal and maritime areas by ensuring that new developments do not detract from water quality and ensuring that wastewater treatment and non-point sources are appropriately located.*

Consideration: Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) considers the potential changes in marine water and sediment quality as a result of the Proposed Development during the construction, operation and maintenance and decommissioning phases of the Proposed Development. The

assessment has regard to the protection of coastal, transitional and bathing waters and to the requirement to prevent deterioration in water quality based on the Water Framework Directive assessment which has been provided in Appendix 7.1 in Volume III of the EIAR (Revised March 2026).

Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) concludes that following the implementation of factored-in measures, including an Environmental Management Plan (EMP) and Marine Pollution Contingency Plan (MPCP) (Refer to Volume III, Appendix 25.1: Environmental Management Plan (Revised March 2026), the effects of the Proposed Development on marine water and sediment quality will be imperceptible in the wider marine environment and not significant in respect of designated coastal, transitional and bathing waters for all phases of the development. The assessment confirms that the Proposed Development will not result in a deterioration of water quality.

Volume III, Appendix 7.1: Water framework Directive Assessment (Revised March 2026) confirms that the activities associated with the Proposed Development are not considered to hinder the achievement of 'Good Environmental Status', as prescribed under the water quality policies. The Proposed Development will not result in a deterioration of the current status of the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea - Killiney Bay (HA 10) coastal water bodies or any other protected WFD waterbodies, nor jeopardise the attainment of 'Good' status.

Therefore, it is considered that the Proposed Development complies with CZM40.

- ***CZM41****: To apply an ecosystem approach to planning in the coastal and maritime areas to ensure the protection of biodiversity habitats and species and marine protected areas to ensure that development or activity in the coastal zone or maritime area does not give rise to displacement or disturbance of species, or does not adversely impact on coastal habitats, species and features such as wetlands and vegetated dunes which play an important role in flood relief and in protecting from coastal erosion, and are important in their own right.*

Consideration: Refer to the section of the Report below which reviews and assesses compliance of the Proposed Development against 'Chapter 13 Heritage and Conservation'. Refer also to the NIS (Revised March 2026) and the following Chapters in Volume II of the EIAR: 'Chapter 6 - Coastal Processes (Revised March 2026)'; 'Chapter 9 - Benthic Subtidal and Intertidal Ecology (Revised March 2026) '; 'Chapter 10 - Fish, Shellfish and Sea Turtle Ecology (Revised March 2026)'; 'Chapter 11 - Marine Mammals (Revised March 2026)'; 'Chapter 12 - Offshore Ornithology (Revised March 2026)' and 'Chapter 13 - Offshore Bats (Revised March 2026)'. On the basis of that assessment and the conclusions of the NIS and EIAR, it is considered that the Proposed Development complies with CCZM41.

- ***CZM42****: To protect heritage assets in the coastal zone and maritime area including underwater heritage in accordance with Chapter 13 Heritage and Conservation and Volume 5 Record of Protected Structures and the proper planning and sustainable development of the area.*

Consideration: 'Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) of the EIAR provides a detailed analysis of the Proposed Development with respect to marine archaeology and cultural heritage. This assessment is informed by Volume III, Appendix 18.1:Marine Archaeology Technical Report (Revised March 2026).

Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) concludes that there will be no significant effects with respect to marine archaeology or cultural heritage arising from the Proposed Development during the Construction, Operational and Maintenance or Decommissioning phases and that these cumulative effects relate to changes in setting only and do not affect the physical integrity or cultural significance of the assets.

However, the EIAR notes that there will be a significant cumulative effect arising from the Proposed Development alongside other projects/plans, such as Codling Wind Park and Dublin Array, for indirect impact on the setting of terrestrial cultural heritage assets during the Construction and Operational and Maintenance phases.

It is noted that the cultural assets identified and considered in the EIAR are located between 6.8 km and 40 km from the Array Area.

Volume III, Appendix 18.2: Cultural Heritage Visual Impact Assessment Report'(Revised March 2026) of the EIAR alongside Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) provides an assessment of the degree to which settings and views from recorded cultural heritage sites may be affected by the Proposed Development, based on the 60km 'Zone of Theoretical Visibility' (ZTV) identified in Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026).

The Cultural Heritage Visual Impact Assessment Report' concludes that the presence of the Proposed Development will not detract from the ability to understand and appreciate the cultural heritage assets.

Taking account of the above, including the identification and protection of known and potential underwater archaeological remains and the implementation of archaeological avoidance, monitoring and reporting procedures set out in Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) and Volume III, Appendix 18.1: Marine Archaeology and Cultural Heritage Technical Report (Revised March 2026), together with the findings of Volume III, Appendix 18.2: Cultural Heritage Visual Impact Assessment Report (Revised March 2026) and Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026) that the cultural significance and appreciation of recorded cultural heritage assets will not be adversely affected, it is considered that the Proposed Development complies with Objective CZM42.

- ***CZM44:*** *To protect water quality in our coastal and maritime areas and to ensure that development proposals would not result in adverse impacts on water quality in order to comply with objectives of the EU Water Framework Directive (2000/60/EC) and the associated National River Basin Management Plan 2018-2021, the EU Shellfish Waters Directive (2006/113/EC) and associated Pollution*

Reduction Programme, the Marine Strategy Framework Directive and the Habitats Directive.

Consideration: Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) considers the potential changes in marine water and sediment quality as a result of the Proposed Development during the construction, operation and maintenance and decommissioning phases of the Proposed Development. Chapters 6 and 7 in Volume II of the EIAR identifies that activities associated with the Proposed Development will give rise to suspended sediment plumes and may cause a temporary deterioration in water quality; however, the increased concentration of sediment is expected to be short-term, comparable to storm conditions, and receptors are expected to fully recover.

Volume II, Chapter 7: Marine Water and Sediment Quality (Revised March 2026) concludes that following the implementation of factored in measures, including an Environmental Management Plan (EMP) and Marine Pollution Contingency Plan (MPCP) (Appendix 25.1 of Volume III of the EIAR (Revised March 2026)) which will avoid accidental spill and ensure that any such events are appropriately managed to minimise pollution risk, the significance of effect for this impact has been assessed as imperceptible for the wider marine environment and not significant on designated coastal, transitional, and bathing waters for all phases of the Proposed Development.

A WFD compliance assessment has also been undertaken (see Volume III, Appendix 7.1 Water Framework Directive Assessment (Revised March 2026) to consider the potential effects of the Proposed Development and ensure that the proposed activities 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.

The conclusions reached through the WFD assessment are also applicable for the Marine Strategy Framework Directive, noting that the MSFD assessment (Annex 2) separately evaluates seabed integrity, habitats and underwater noise and confirms that the Proposed Development will not prevent the marine environment from achieving or maintaining Good Environmental Status.

The WFD assessment confirms that the activities associated with the Proposed Development are not considered to hinder the achievement of 'Good Environmental Status', as prescribed under the water quality policies. The Proposed Development will not result in a deterioration of the current status of the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea - Killiney Bay (HA 10) coastal water bodies or any other protected WFD waterbodies, nor jeopardise the attainment of 'Good' status.

The WFD assessment also concludes that the cumulative impacts of the Proposed Development with other projects are not anticipated to result in the deterioration of current status, nor jeopardise attainment of 'Good' status for the Southwestern Irish Sea - Brittas Bay (HA 10) or Southwestern Irish Sea- Killiney Bay (HA 10) coastal water bodies or any other protected WFD waterbodies. Therefore, the Proposed Development complies with CZM44.

- ***CZM45:*** *To maintain, conserve and restore marine ecosystems in existing and future designated Marine Protected Areas in order to achieve or maintain good environmental status of the maritime area.*

Consideration: Refer to the section of the Report below which reviews and assesses compliance of the Proposed Development against 'Chapter 13 Heritage and Conservation'. On the basis of that assessment, it is considered that the Proposed Development complies with CZM45.

- ***CZM51****: To support, within the context of the Offshore Renewable Energy Development Plan (OREDP) and its successors, the development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements subject to compliance with the objectives of this County Development Plan, the protection of the scenic amenity and coastal views associated with coastal areas and the marine area which are crucial to the tourism industry, the protection of the amenity, livelihood and cultural well-being of coastal communities, the protection of coastal features, habitats and species and compliance with the Habitats Directive and normal.*

Consideration: This objective supports the Proposed Development, and it is noted that compliance with the objectives and components referred to in CZM51 is confirmed within the assessment on each of the respective WxCDP Chapters in this section of the Report.

Heritage and Conservation

9.104 Chapter 13 of the WxCDP sets out objectives to ensure the protection of the natural, built and cultural heritage of the county and provides the spatial framework and objectives for its protection either directly by the Council, or by supporting its protection through other responsible agencies.

9.105 The overarching goal of this Chapter is to '*protect, conserve and where appropriate enhance the natural, built and cultural heritage of the county and to encourage all to appreciate, enjoy, understand and care for our heritage to help enhance and secure it for future generations*.'

9.106 The following 'Heritage and Conservation' objectives are of note with respect to the assessment of the Proposed Development, and have been considered in its siting and design:

Natural Heritage

- ***NH01****: To ensure the protection of all designated ecological sites (as detailed in Section 13.2.1 to 13.2.11) in relevant Local Area Plans and in the assessment of planning applications and promote the restoration of sites where required.*

- ***NH02****: To protect and enhance the rich qualities of our natural heritage in a manner that is appropriate to its significance.*

- ***NH03****: To promote biodiversity protection, restoration, and habitat connectivity both within protected areas and in the landscape through promoting the integration of green infrastructure and ecosystem services, including landscape,*

heritage and biodiversity and management of invasive and alien species in the plan making and development management processes.

- ***NH05**: In assessing planning applications located in and/or in proximity to Natura 2000 sites, whether hydraulically linked or otherwise linked or dependent (such as feeding, roosting or nesting grounds) to a designated site, regard shall be had to the detailed conservation management plans and data reports prepared by NPWS, where available, to the identified features of interest of the site, the identified conservation objectives to ensure the maintenance or restoration of the features of interests to favourable conservation status, the NPWS Article 17 current conservation status reports, the underlying site specific conditions, and the known threats to achieving the conservation objectives of the site.*

- ***NH08**: To ensure that any plan/project and any associated works, individually or in combination with other plans or projects, are subject to Screening for Appropriate Assessment to ensure there are no likely significant effects on any Natura 2000 site(s) and that the requirements of Article 6(3) and 6(4) of the EU Habitats Directive are fully satisfied. Where a plan/project is likely to have a significant effect on a Natura 2000 site or there is uncertainty with regard to effects, it shall be subject to Appropriate Assessment. The plan/project will proceed only after it has been ascertained that it will not adversely affect the integrity of the site or where, in the absence of alternative solutions, the plan/project is deemed by the competent authority imperative for reasons of overriding public interest.*

- ***NH09**: To ensure the protection of areas, sites and species and ecological networks/corridors of local biodiversity value outside the designated sites throughout the county and to require an ecological assessment to accompany development proposals likely to impact on such areas or species.*

- ***NH19**: To implement the requirements of EU Regulations 1143/2014 on the Prevention and Management of the Introduction and Spread of Invasive Alien Species and Regulation 49 and 50 of the EU (Birds and Natural Habitats) Regulations 2011(S.I. No. 477/2011), as amended.*

- ***NH25**: To ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species carried out by a competent and appropriately qualified expert as part of the planning process.*

Consideration: An EIAR has been submitted with the Application for the Proposed Development. This assesses 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 March 2026), 11 Marine Mammals (Revised March 2026), 12 Offshore Ornithology (Revised March 2026) and 13 Offshore Bats (Revised March 2026).

The updated EIAR concludes that no significant adverse effects are predicted on biodiversity receptors following the application of the mitigation measures. It is unlikely that the population abundance of species will be adversely affected by the Proposed Development and long-term viability of relevant populations will be maintained.

In light of the conclusions of the EIAR for all biodiversity-related topics, no additional mitigation is required in relation to species adaptation, migration or natural habitat connectivity. Notwithstanding this, the Proposed Development includes a commitment to ongoing ecological monitoring, including participation in the East Coast Monitoring Group (ECMG) to support strategic monitoring initiatives in relation to offshore ecology, and the implementation of an Operational Monitoring Plan (RFI March 2026) (Annex A in Volume III, Appendix 25.1 Environmental Management Plan (Revised March 2026)) , which provides a comprehensive and adaptive monitoring framework to be applied throughout the lifetime of the Proposed Development, including post-construction and operational phase monitoring of key ecological receptors, with reporting to relevant authorities.

A Natura Impact Statement (NIS) (Revised March 2026) has been submitted with the Application to inform Stage 2 Appropriate Assessment under Article 6 (3) of the Habitats Directive. The NIS concludes that there will be no adverse effects on the integrity of any European sites either alone or in combination with other plans or projects.

Accordingly, taking account of the conclusions of the EIAR and NIS, the Proposed Development complies with NH01, NH02, NH03, NH05, NH08, NH09, NH19 and NH25.

Archaeological and Cultural Heritage

- ***AH01****: To conserve and protect archaeological sites, monuments (including their settings), underwater archaeology and objects including those listed or scheduled for inclusion on the Record of Monuments and Places and/or the Register of Historic Monuments or newly discovered sub-surface archaeological remains.*

- ***AH03****: To protect the heritage of groups of important archaeological sites and monuments, inclusive of their contextual setting and interpretation, in the operation of development management.*

- ***AH04****: To fully consider the protection of archaeological heritage when undertaking, approving or authorising development. In considering such protection the Council will have regard to the advice and recommendations of the National Monuments Service and the principles set out in Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).*

- ***AH05****: To require an archaeological assessment and/or investigation by qualified persons for development that may, due to its size, location or nature, have a significant effect upon archaeological heritage and to take appropriate measures to safeguard this archaeological heritage. In all such cases the Planning Authority shall consult with the National Monuments Service in the Department of Culture, Heritage and the Gaeltacht.*

- ***AH06****: To promote a presumption in favour of preservation in-situ of archaeological remains and settings when dealing with proposals for development that would impact upon archaeological sites and/or features. Where preservation in-situ is not possible the Council will consider preservation by record in appropriate circumstances.*

- ***CH02****: To safeguard the cultural heritage of the county and facilitate the expansion and development of appropriate facilities suitably located adjacent to points of interest subject to compliance with normal planning and environmental criteria and the development management standards contained in Volume 2.*

Consideration: 'Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) provides a detailed analysis of the Proposed Development with respect to marine archaeology and cultural heritage and is informed by Volume III, Appendix 18.1:the Marine Archaeology Technical Report (Revised March 2026), supported by additional geophysical survey data acquired in 2024 which has refined understanding of seabed conditions and archaeological potential within the proposed development area.

Volume II, Chapter 18: Marine Archaeology and Cultural Heritage (Revised March 2026) concludes that there will be no significant effects with respect to marine archaeology or cultural heritage arising from the Proposed Development during the Construction, Operational and Maintenance or Decommissioning phases.

However, the EIAR notes that there will be a significant cumulative effect arising from the Proposed Development alongside other projects/plans, such as Codling Wind Park and Dublin Array, for indirect impact on the setting of terrestrial cultural heritage assets during the Construction and Operational and Maintenance phases which relates to changes in setting only and does not affect the physical integrity or cultural significance of the assets and cannot be mitigated,

It is noted that the cultural assets identified and considered in the EIAR are located between 6.8 km and 40 km form the Array Area.

The assessment of effects on the setting of and views from recorded cultural heritage sites is informed by Volume III, Appendix 18.2: Cultural Heritage Visual Impact Assessment Report (Revised March 2026), which provides an assessment of the degree to which settings and views from recorded cultural heritage sites may be affected by the Proposed Development, based on the 60 km 'Zone of Theoretical Visibility' (ZTV) identified in Volume II, Chapter 17: Seascape, Landscape and Visual Impact Assessment (Revised March 2026).

The Cultural Heritage Visual Impact Assessment Report concludes that the presence of the Proposed Development will not detract from the ability to understand and appreciate the cultural heritage assets.

Taking account of the above, including the presumption in favour of preservation in situ or preservation by record, the overarching strategic and statutory policy support for the Proposed Development along with the need for, and associated public benefits

of, the Proposed Development complies with objectives AH01, AH03, AH04, AH05, AH06 and CH02.

Energy Strategy

9.107 Volume 10 of the WxCDP contains the County 'Energy Strategy' which sets out renewable energy resource targets for County Wexford by 2030 to contribute to both national renewable energy targets and the transition to a low carbon economy.

9.108 The Strategy notes that the '*…revised Renewables Directive establishes a binding renewable energy target for the EU for 2030 of at least 32% with a clause for a possible upwards revision by 2023*'. The Strategy sets out 2 scenarios in terms of how Wexford can help Ireland achieve these binding targets. Based on the analysis contained in the Strategy, it is stated that '*…the generation of renewable energy will increase by 200% up to 2030*'.

9.109 The Proposed Development will assist Wexford County Council in growing the quantum of renewable energy and help it to achieve the binding European/National targets and the targets outlined in the Energy Strategy.

9.110 Section 7.1.3 of the Strategy relates specifically to Offshore Wind Farms and states that '*Offshore wind is the most technically advanced of the marine renewables*'. It also notes that '*The advantage of offshore over onshore wind farms is that larger and more efficient turbines can be used at sea and wind availability is typically higher*'.

9.111 However, the Strategy acknowledges that '*…offshore wind presents challenges in terms of construction, grid connection, planning and visual/environmental impacts, requiring the input of a wide range of stakeholders. Careful consideration needs to be given to the impact of such developments on the seascape, designated sites and other marine activities*.'

9.112 Despite these challenges, the Strategy advises that '*Offshore wind energy is expected to contribute to the national 2030 renewable energy targets'* and cites the Climate Action Plan 2019 which stated that '*…achieving the national 70% renewable electricity target by 2030 will include a number of measures, including the development of at least 3.5 GW of offshore renewable energy of mainly offshore wind'*.

9.113 Consequently, the Energy Strategy sets out the following objective.

- ***ES24****: To support the development of offshore renewable energy in accordance with the Offshore Renewable Energy Development Plan (Department of Communications, Energy and Natural Resources, 2014), the Climate Action Plan 2019 and any Maritime Spatial Plan that is adopted for Ireland.*

Consideration: The Proposed Development complies with objective ES24 as it will support the development of offshore renewable energy in accordance with the documents cited by delivering a new offshore renewable energy park.

9.114 Having assessed the Proposed Development against the relevant objectives of the WxCDP and taking account of the need for, and benefits of, the Proposed Development, outlined in this Planning Report, it is considered that the Proposed

Development complies with the overarching Vision, Strategy, Core Strategy, Goals and Objectives of the WxCDP.

10. Conclusion

10.1 This Planning Report sets out the strategic European, national, regional and local polices/ strategies/ frameworks/ plans for renewable energy projects in Ireland. This demonstrates significant Government and strategic policy support for renewable energy projects, such as ABWP2. This should be afforded significant weight in the determination of the Application.

10.2 The Proposed Development, if approved, would be able to export power to the Irish grid from 2030 at a capacity of 800MW which is 16% of the CAP25 national target for offshore wind of at least 5GW Offshore Wind by 2030 and would also make a significant contribution to achieving legally binding targets for the reduction GHG emissions. Given the target date of 2030 is now aligned with the delivery of the Proposed Development, there is a clear need for the Proposed Development to proceed to ensure compliance with the statutory target, having regard to the current stage of development of the national offshore wind pipeline and the limited number of projects with a realistic prospect of delivery within the 2030 timeframe.

10.3 The Proposed Development will assist in achieving the following ambitions/objectives/outcomes of the relevant national, regional and local planning policy context:

- transitioning to a competitive, low carbon, climate resilient and environmentally sustainable economy.
- ensuring a more distributed, renewables-focused energy generation system.
- harnessing the considerable offshore potential from wind energy sources.
- increasing the quantum of our electricity needs from renewable sources.
- increasing renewable energy deployment in line with EU targets.
- progressively develop Ireland's offshore renewable energy potential; and
- strengthen Ireland's energy security and resilience.

10.4 The Proposed Development will deliver significant economic benefits during the construction, operational and maintenance and decommissioning phases, with an estimated spend of €4.9 billion over the lifetime of the Project. This investment will deliver the following benefits to Ireland, the south east regional area and Counties Wicklow and Wexford:

- Create 1,720 annualised Full Time Equivalent (aFTE) jobs during the development and construction phase, 430 of which will be in the regional area.
- Employment that will generate €111 million Gross Value Added (GVA) for the Irish economy.
- Employment generating €25 million (GVA) for the regional economy.

- Generate €16 million for the Irish economy of which €11 million will benefit the regional economies during the operational phase of the development; and

- Generate over €500 million GVA over the 36.5 year operational lifespan of the development.

10.5 This Planning Report assesses the Proposed Development against the relevant national, regional and local statutory planning policy, including the National Marine Planning Framework (see **Annex 1** for a detailed assessment of compliance). It is noted that whilst the Proposed Development will result in significant effects on a small number of factors assessed in the accompanying EIAR, these have been mitigated where possible.

10.6 Taking account of the clear and overarching national policy support for offshore renewable energy, the statutory requirement to deliver large-scale renewable electricity generation in order to meet Ireland's legally binding climate change mitigation and decarbonisation targets, and the strategic need for the Proposed Development, it is considered that the Proposed Development delivers substantial public benefits of a scale that is material in the context of national climate and energy objective. These benefits include a material contribution to Ireland's offshore wind capacity target which cannot be readily substituted within the required timeframe, such as the enhanced security of electricity supply, significant socio-economic benefits at national, regional and local levels, and long-term climate benefits through the displacement of fossil fuel generation.

10.7 Having regard to the conclusions of the EIAR and NIS, the Proposed Development complies with relevant planning policy and is acceptable in respect of its likely environmental effects and, on balance, its contribution to national climate, energy and economic objectives, its consequences for the proper planning and sustainable development of the area and will contribute to meeting the obligations of the Climate Act 2015 (as amended).

Annex 1: NMPF Compliance Table (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.

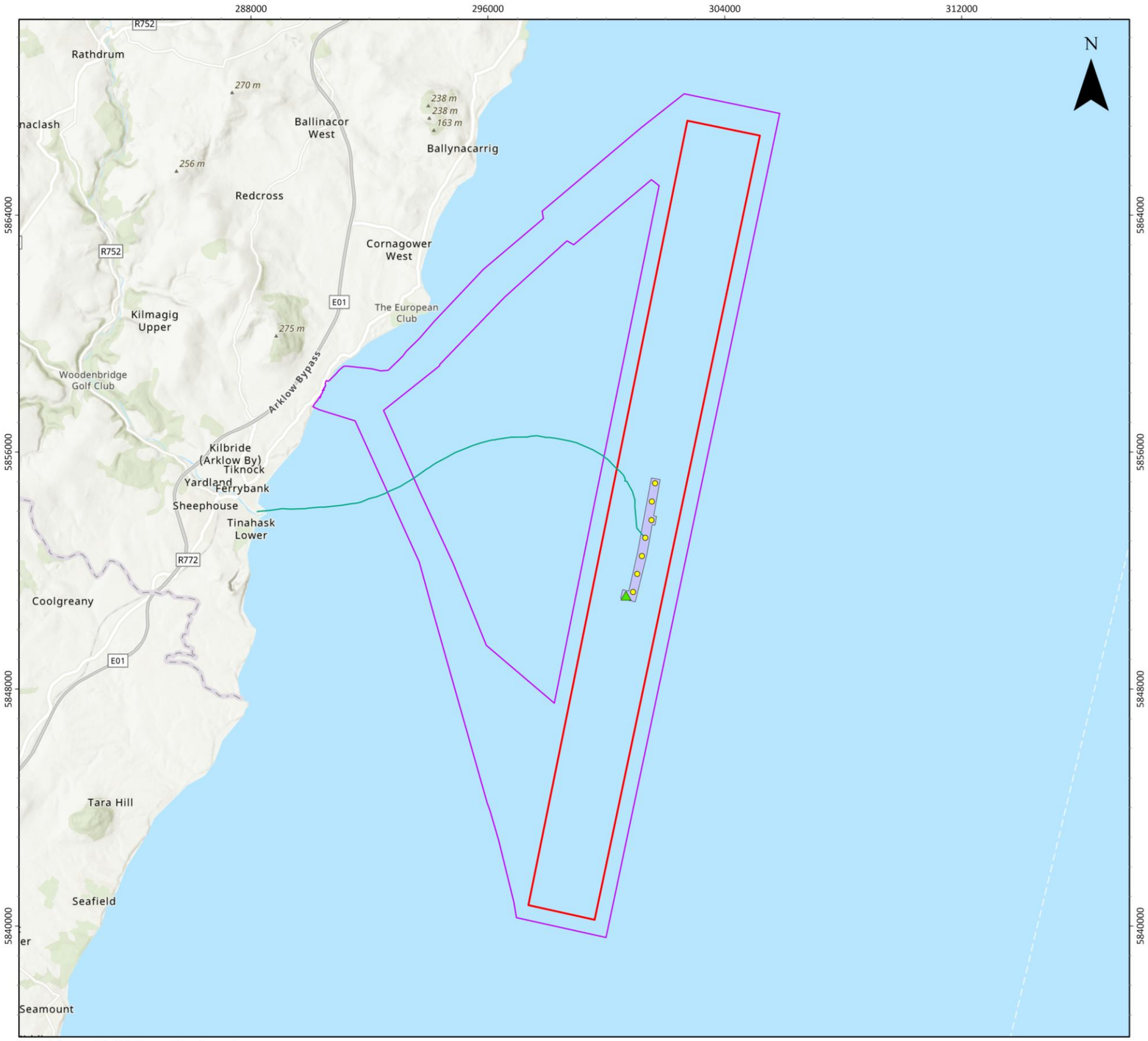
1.3.1.6 Further details of the Proposed Development are provided in Volume II, Chapter 4: Description of Development (Revised March 2026).

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.



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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

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Figure Number 1

Figure Reference: Ark_Fig1_ProposedDevelopment

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)

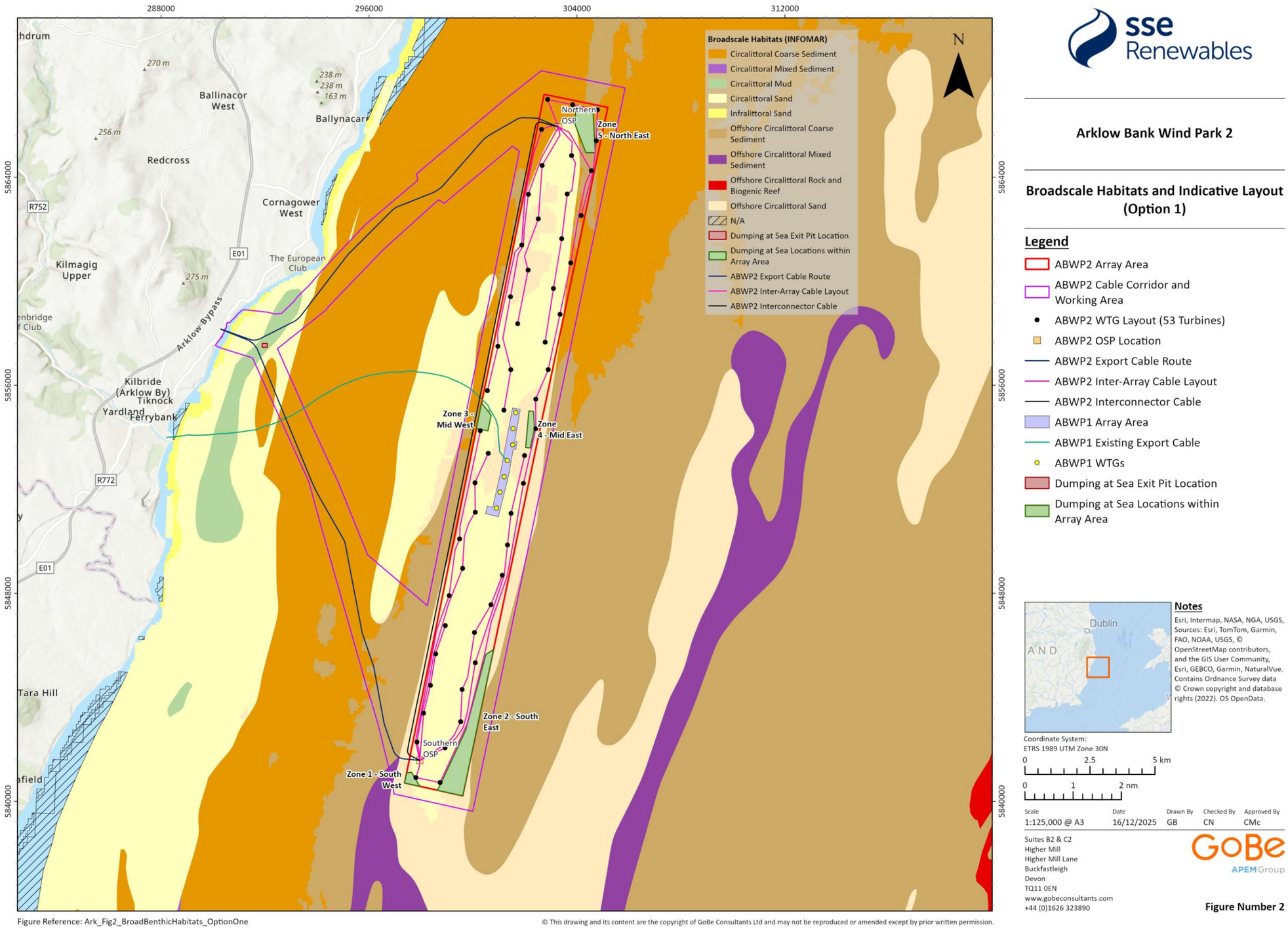

Figure Reference: Ark_Fig2_BroadBenthicHabitats_OptionOne

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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

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Coordinate System:
ETRS 1989 UTM Zone 30N

0 2.5 5 km

0 1 2 nm

Scale	Date	Drawn By	Checked By	Approved By
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Figure Number 2

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

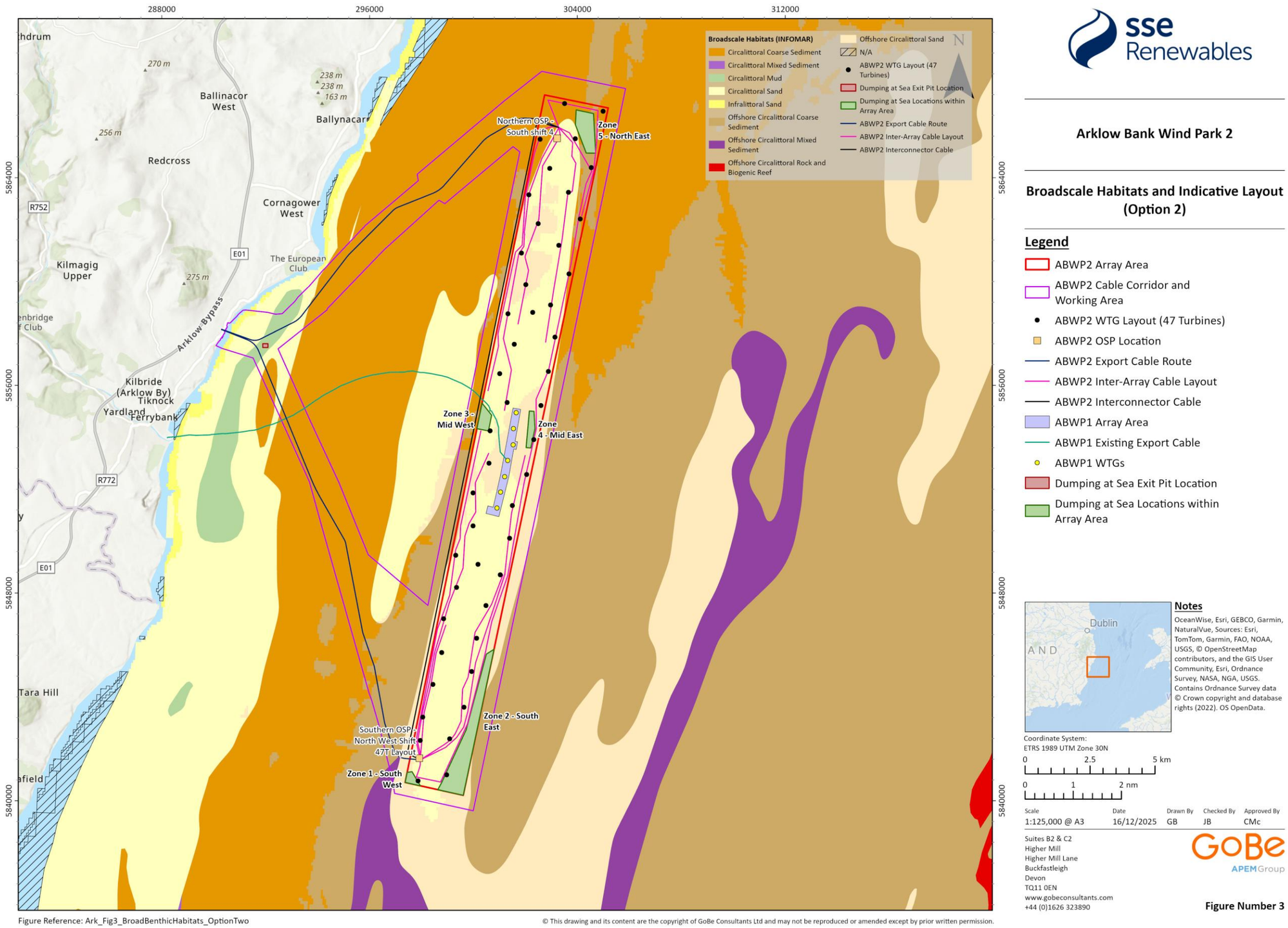

Figure Reference: Ark_Fig3_BroadBenthicHabitats_OptionTwo

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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

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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

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Higher Mill
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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**

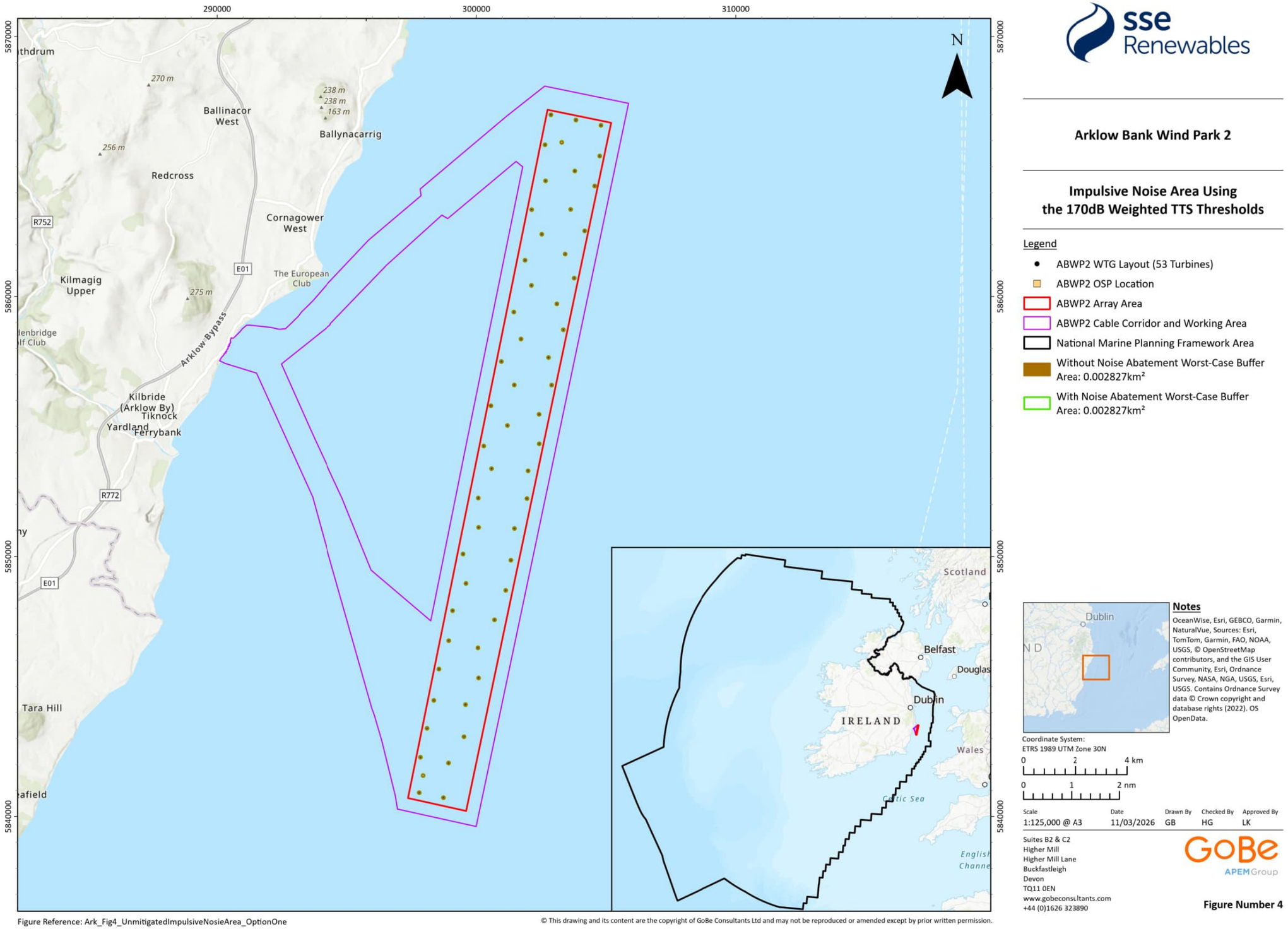


Figure 4 Impulsive Noise Area Using the 170dB Weighted TTS Threshold for with and without noise abatement scenarios

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.

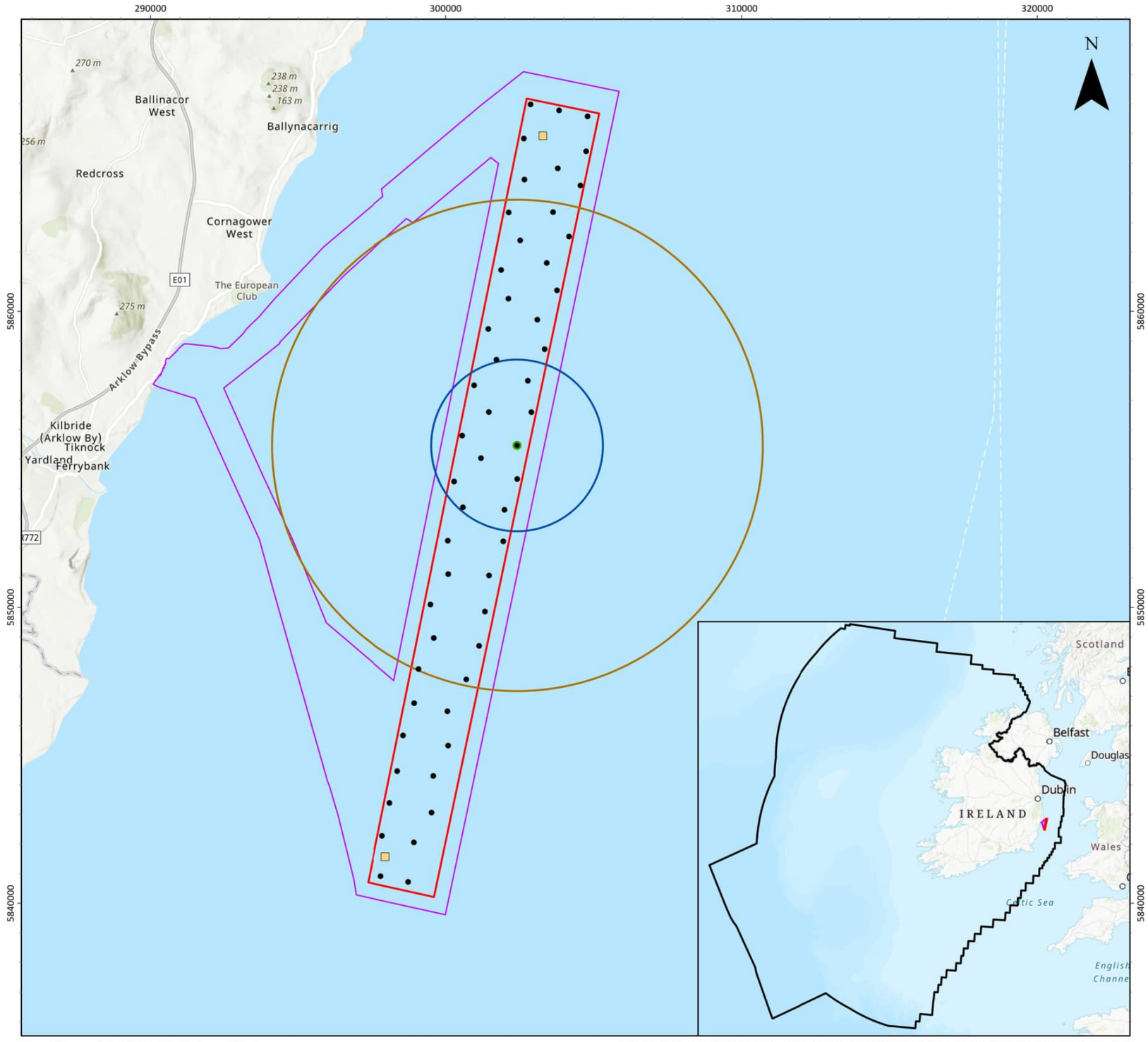
3.2.3.8 To ensure a conservative evaluation for the construction-phase assessment, the maximum representative range was mapped from a location within the Proposed Development area that led to the maximum the spatial extent across the Irish Maritime Area, by avoiding any overlap of

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



Arklow Bank Wind Park 2

Modelled Continuous Noise Areas Using the 120dB re 1 µPa (RMS) Threshold

Legend

- ABWP2 WTG Layout (53 Turbines)
- ABWP2 OSP Location
- ABWP2 Array Area
- ABWP2 Cable Corridor and Working Area
- National Marine Planning Framework Area
- Maximum Continuous Noise Range - Operational WTG 250m Rotor Diameter (0.12km)
- Maximum Continuous Noise Range - Large Vessel Noise (2.9km)
- Maximum Continuous Noise Range -Cable Laying (8.3km)

Notes

Esri, Intermap, NASA, NGA, USGS, OceanWise, Esri, GEBCO, Garmin, NaturalVue, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, 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

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GoBe APEMGroup

Figure Number 5

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.

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Annex 3: Ecosystem 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.

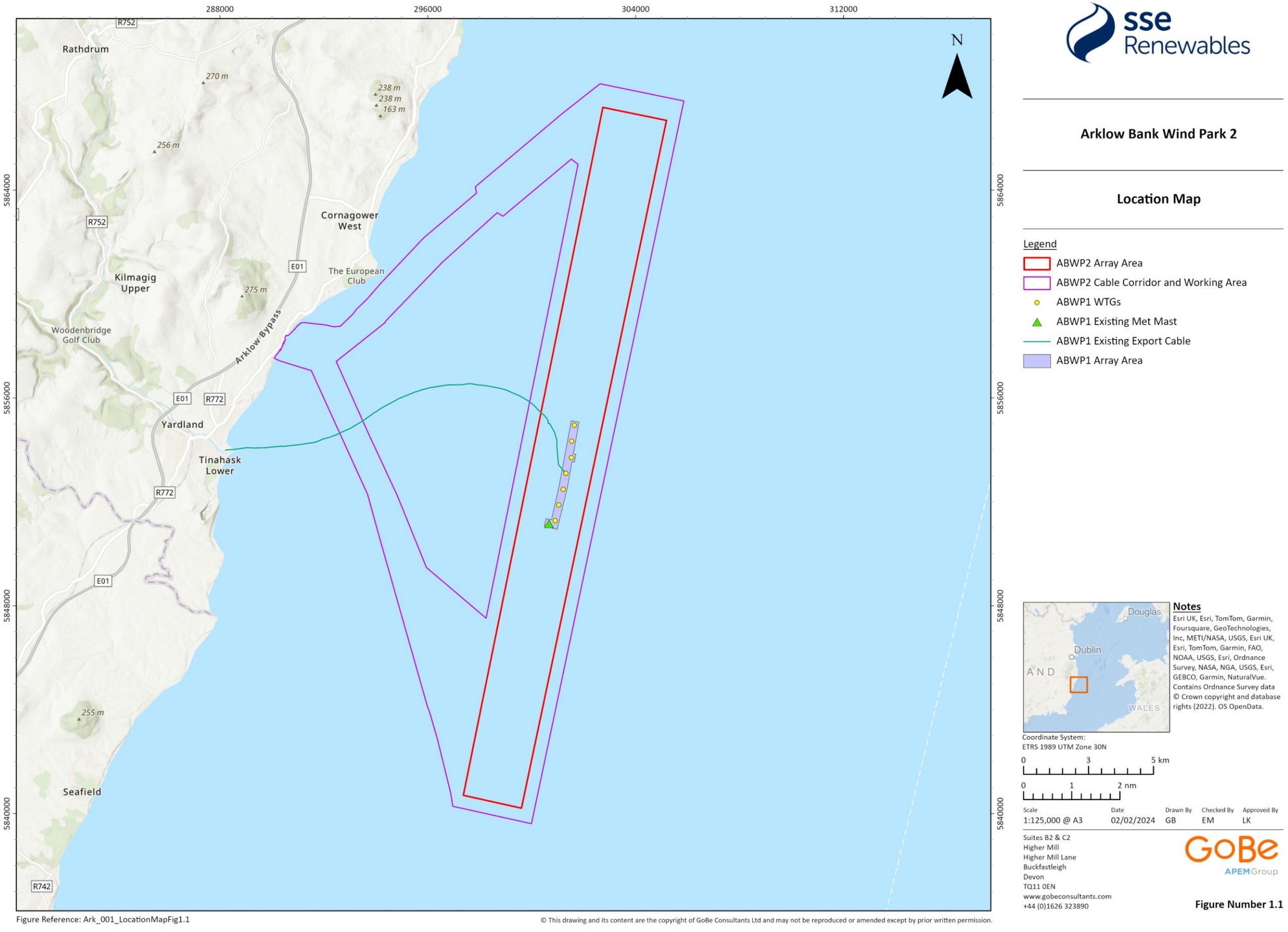

Figure 1.1 Arklow Bank Wind Park 2 (the Proposed Development)

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.

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		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.

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	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.

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	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.

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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

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	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

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