



Coastal Concern Alliance,
93 George's St Lower
Dún Laoghaire
Co. Dublin

29 July 2025

RE: Submission on behalf of Coastal Concern Alliance in respect of Arklow Bank
Wind Park 2: Response to Additional Information: ACP Reference: OA27.319864

Dear An Coimisiún Pleanála Officers,

Please find attached a submission on behalf of Coastal Concern Alliance in
respect of Arklow Bank Wind Park 2 (Bord Pleanála Case Reference: OA27.319864.
Coastal Concern Alliance have already made a valid submission to the Commission regarding
the application in 2024.

Please confirm receipt of this request (to coastalconcern@gmail.com) at your earliest
convenience.

Best regards,

Helen Doyle
CCA Policy Team



Arklow Bank Wind Park Phase 2: Response to Additional Information

ACP Reference: OA27.319864

Coastal Concern Alliance Submission

29 July 2026

Introduction

Coastal Concern Alliance (CCA) is a voluntary citizens' organisation established in 2006 to promote the introduction of modern Marine Spatial Planning (MSP) in Ireland. For almost two decades, CCA has participated constructively in Government consultations, policy reviews and planning processes concerning the sustainable development of Ireland's marine resources.

Throughout this period, CCA has consistently supported the development of offshore renewable energy that is done sustainably; that is fully compliant with our national European and International legal obligations and that recognises the intertwined nature of the climate and biodiversity crises by avoiding particularly sensitive ecological areas and fully assessing potential environmental impacts in line with best international practice.

The Alliance has consistently argued that offshore wind should be planned through a strategic, ecosystem-based and plan-led marine planning system rather than through the historical practice of developer-led site selection which pertained under the Foreshore act 1933. As we are too well aware, this involved sites allocated to developers on “a first come first served” basis on the sole authority of the Minister for the Marine, with no public tender, no statutory involvement of local authorities and no right of appeal against the Minister’s decision. Crucially, there was no system of marine spatial planning to guide appropriate site selection for development.

Over the past twenty years, CCA has made numerous submissions to Government departments, public consultations and planning authorities advocating for reform in the way our marine space is governed through the introduction of Marine Spatial Planning, Strategic Environmental Assessment, ecosystem-based management and the strategic identification of suitable areas for offshore renewable energy. We have made detailed submissions on planning applications to An Bord Pleanála in respect of offshore wind energy developments including Arklow Bank Wind Park 2 (August 2024). All these submissions are available on our website at <https://sites.google.com/view/coastalconcern1/cca-documents>.

In this short submission on Arklow Bank Additional Information we do not intend to reiterate the substantial points made in our submission of August 2024 other than to restate the conclusion that the development of this vast industrial development on this sensitive near shore site is contrary to all principles of proper planning and sustainable development and will single Ireland out as a cautionary example of what can go wrong if speculation and inadequate regulation rather than strategic planning govern development at sea.

Ireland site selection - what went wrong?

Over the years, CCA have observed and commented on the constant tension in Ireland between two competing objectives:

1. Creating a modern ecosystem based, plan-led system in line with EU legislation.
2. Protecting and accelerating a pipeline of developer-led offshore wind farm projects on sites first proposed under the Foreshore Act 1933.

It became clear to us as we watched vast individual developer -led projects seek to justify site selection *in Ireland's sensitive near shore zone* that the only way to ensure sustainable development was to move to a Plan-led system with an initial state-led selection of potential development areas.

As the Government acknowledged the need for reform, CCA particularly welcomed the Government's stated commitment to replacing the former developer-led approach with a plan-led system for offshore renewable energy development.

When launching the national Marine Planning Framework and related legislation, Minister Ryan stated *"the legislation will provide the legislative underpinning and flexibility to allow Ireland to move from the current regime towards **a more centralised plan-led regime** for offshore renewable energy.* The National Marine Planning Framework itself states that its purpose is to *"direct decision makers, users and stakeholders **towards strategic, plan-led and efficient use of our marine resources**".*

Transition arrangements

Notwithstanding the Government admission that the system needed reform, transitional arrangements introduced enabled a number of legacy offshore wind projects, originally identified by developers under the former Foreshore Act 1933 regime, to continue through the planning process. These projects were designated as "Relevant Projects" by Minister Eamon Ryan on his sole authority under the Maritime Area Planning Act, thereby allowing them to progress within the new legislative framework. This unprecedented move and subsequent awarding by the Minister of Maritime Area Consents (MACs) effectively pulled the rug from under the Government's attempt at reform - allowing large-scale developer-led legacy projects known as Phase One projects to hang on to their self-selected sites

The planning reforms introduced over the past decade were intended to change not merely the consenting process for offshore wind, but also the process by which suitable locations for offshore wind are identified.

The unprecedented transition arrangements, give rise to an important question. The strategic planning principles that now underpin Ireland's marine planning system were introduced precisely because the former developer-led model was no longer considered appropriate for the long-term management of Ireland's maritime area.

Accordingly, it is pertinent to ask whether it is appropriate to permit Phase One projects given the acknowledgement of the planning flaws underpinning their advancement to this stage. Would such projects be permitted if Marine Protected Areas had been designated first and appropriate sites identified under an ecosystem-based marine planning system?

Additional Information

As the additional information provided by the applicant is designed to justify the project as proposed on a developer selected site, it does not change the key fact that the appropriateness of this site for the massive industrial development proposed has not been assessed in the national interest in line with EU environmental legislation and current good practice. The real potential of substantial damage to the environment from this large-scale development cannot be ruled out.

While the Applicant's Additional Information provides further technical assessment and seeks to justify the proposed development at the selected location, it does not demonstrate that the site identification of this nearshore sandbank for massive industrial development almost two decades ago has been reconsidered within the type of plan-led marine planning framework that now guides offshore wind development in Ireland and the EU.

Summary

Ireland has fundamentally changed how offshore wind should be planned. CAA request that the Board consider whether the Arklow Wind Park 2 application has satisfactorily demonstrated consistency with the strategic planning principles embodied in Ireland's current marine planning framework before consent is considered.

For information, we append a comparative table illustrating the evolution of offshore wind planning from the developer-led approach that existed when Arklow Bank Wind Park 2 was originally proposed to the strategic, plan-led approach that now underpins marine planning in Scotland and increasingly across Europe. The comparison demonstrates how modern Marine Spatial Planning seeks to ensure that **strategic decisions regarding the location of offshore wind development are taken before individual projects are assessed**.

Evolution from Developer-Led to Plan-Led Marine Spatial Planning: Lessons from Scotland

Ireland – Legacy Planning Process	Scotland – Plan-Led Marine Spatial Planning
Developers identified preferred offshore sites before any national marine spatial planning framework existed.	Government identifies suitable areas through national and regional marine planning before projects are brought forward.
Site selection was largely developer-led under the Foreshore Act 1933.	Site selection is informed by strategic marine planning led by public authorities.
No strategic marine planning process considered alternative offshore development areas before sites were selected.	Alternative development areas are considered during preparation of marine plans and Sectoral Marine Plans.
Individual projects became the focus of environmental assessment.	Strategic Environmental Assessment (SEA), Habitats Regulations Appraisal (HRA) and other strategic assessments inform plan preparation before project applications.
Environmental Impact Assessment primarily assessed the impacts of development at the chosen location.	Project EIAs build upon earlier strategic planning and environmental assessment undertaken at plan level.
Limited consideration of cumulative offshore development at the time legacy projects were identified.	Cumulative environmental effects form part of strategic marine planning from the outset.
Marine biodiversity, fisheries, navigation, seascape and other competing interests were considered principally through individual project assessment.	Competing marine interests are balanced strategically using an ecosystem-based approach before development zones are identified.
Project mitigation seeks to reduce impacts at the selected location.	Strategic planning seeks to avoid locating development in the most sensitive areas wherever reasonably possible before mitigation is considered.
Legacy projects continue to be assessed individually despite originating under an earlier planning regime.	New offshore wind proposals are expected to demonstrate consistency with the strategic marine planning framework.

Note: The application for Arklow Wind Park 2 is being submitted by Sure Partners Ltd, a wholly owned subsidiary of energy giant SSE Plc (Scottish and Southern Energy).

In the light of the table above, it is legitimate to ask if a wind farm - similar in size and scale to Arklow Wind Park 2 - was envisaged on an environmentally important sand bank, 6-12km off a beautiful, high-amenity Scottish coastline, would it survive the Scottish Government's site selection process?