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LDG-	_____
ACP-	_____
28 JUL 2026	
Fee: €	_____ Type: _____
Time: 9:15	By: post

Re: Arklow Bank Wind Park Development Phase 2. OA27-319864 Sure Partners

Summary. I made an observation on the original application and am responding to the additional information submitted. This is extremely close to the shore, 6Km at the North end and 8Km from Brittas Bay(BB). With an arc of view of 105 degrees from BB it is exceptionally visually intrusive. The changes made have not mitigated this in any meaningful way. Other European countries have not allowed such visual intrusion especially in such attractive locations as BB.

Recent consenting nearshore decisions in Wales and England have significantly narrowed the Arc of View to 75 degrees in Llandudno and 60 degrees in Brighton. These are the combined Arc with some existing windfarms and they are also further offshore. The Arklow Plan is 7 times longer than the existing turbines and twice the height.

11 turbines at the Northern end, closest to shore, need to be cancelled to the line BB in Appendix 1, leaving an Arc of View of 70 degrees. This reduces the number of turbines to 36 and thus reduces the visual impact while allowing National Renewable energy targets to be reached.

Detail.

Landscape, Views & Prospects. The Planning Report. Page 72, is as follows:

‘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.’

Brittas Bay is the best beach, South of the Liffey, in the Greater Dublin Area. Wicklow County Council has provided extensive car parking and toilets for the many locals & tourists who use it. The wind farm is a massive visual intrusion in such a key area.

Arklow is an industrial port which will benefit from being the base and receiving the ‘green’ electricity for a Data Centre. It is an entirely different type of receptor area to Brittas Bay and extensive visual intrusion is less noticeable than the beaches to the North. The beaches to the South are also further away from the turbines.

Under the NAPF developments MUST avoid, minimise or mitigate significant adverse impacts. The mitigation measures taken by the promoter seem to be reducing the blade width and repositioning some turbines. This is completely inadequate for a development so close, 6Km, to the shore and with an Arc of View of 105 degrees, most of the horizon. In recent years very few nearshore windfarms been approved in Europe or the UK.

2 recent nearshore Consents in Wales and England made substantial reductions in the array area & number of turbines during the Consenting process in order to reduce the visual & landscape adverse impact. These are detailed & mapped in Appendices 3 & 4.

At Awel-Y-Mor, Llandudno the arc of View was reduced from 105 to 75 degrees, cumulative with other wind farms, and more than 10Km offshore. Awel-Y-Mor was consented 2024.

Rampion 2, off Brighton reduced from 80 to 60 degrees cumulative with Rampion 1 an existing smaller wind farm. Consented April 2025. Both applications from RWE and both now occupying less than the lease area. Detailed maps of this reduction in Appendix 3A & 3B. Both Planning Inspectors Decisions note this reduction per Appendix 4A & 4B. **Both Inspectors emphasise that the array & turbine number reduction is the main mitigation measure.**

The 11 Northmost Arklow turbines should be deleted thus reducing the Arc of View to 70 degrees at BB and reducing the visual intrusion to the beaches North of Arklow where it is so close to the coast. This would still provide 36 turbines enabling National Renewable targets to be reached. The developer partly justifies his tiny changes based on the view of the existing turbines. However his proposals are 7 times longer and double the height which is entirely different.

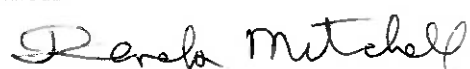
At Arklow this shortening reduces the angle from 95 to 80 degrees and it is 11.5 Km away. This seems acceptable in the industrial receptor area.

The Planning Report states the mitigation measures 'are aligned with industry best practice' The Inspectors Reports of the UK examples clearly contradict this statement as they highlight that array reduction is the main mitigation measure. The mitigation measures by the developer are totally inadequate especially considering how close it is to the especially attractive coast.

My Background.

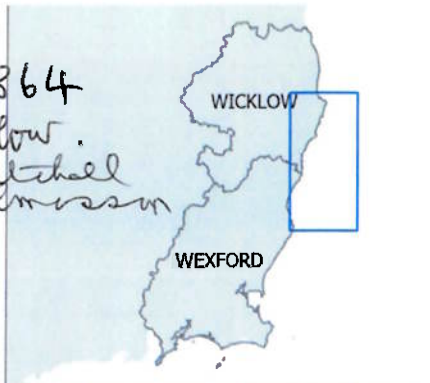
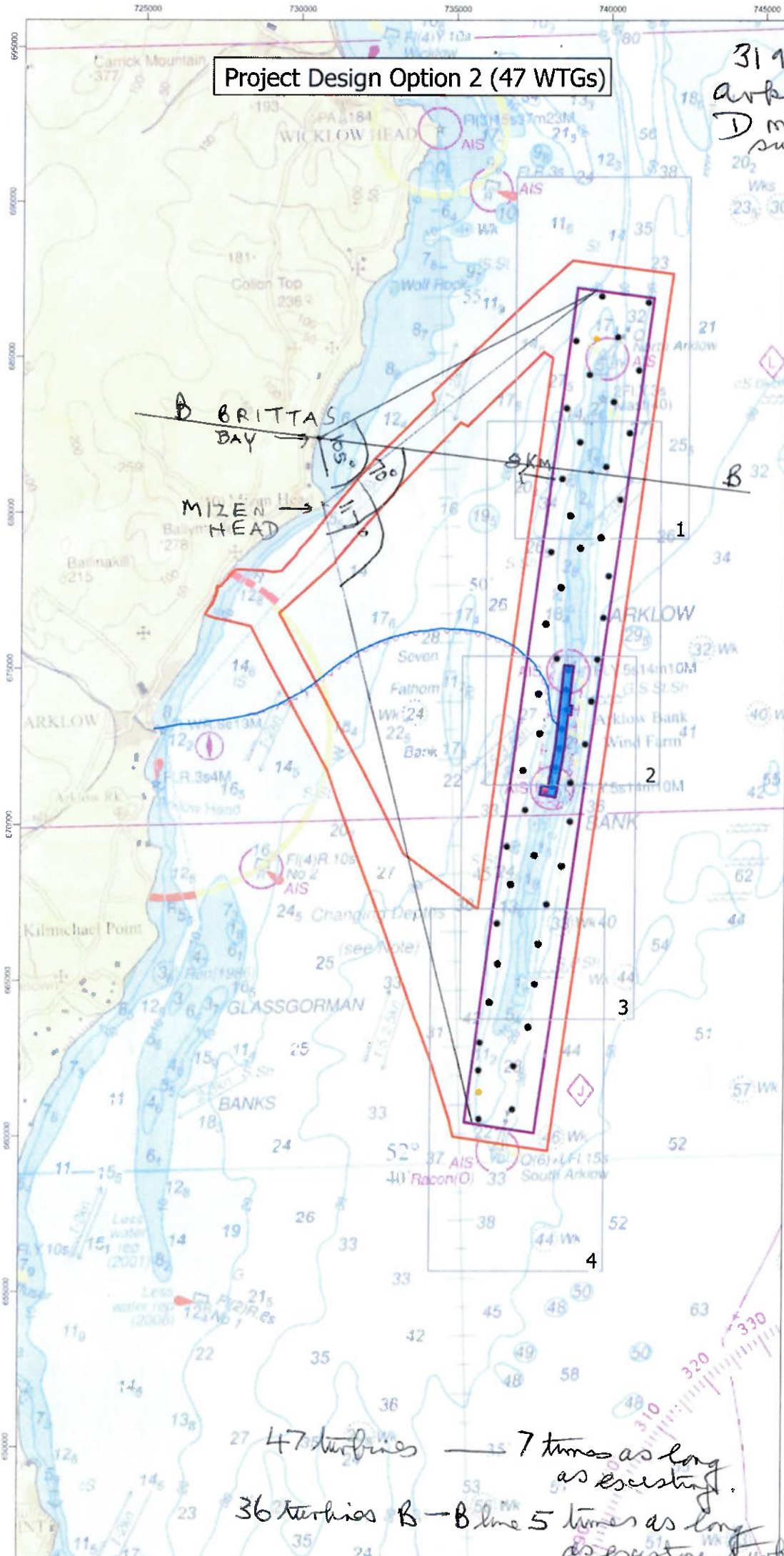
An engineer by training I was a member of Wicklow County Council for 29 years and retired in June 2024. I have done considerable research into windfarms including visiting the Rampion one off Brighton in the UK. I led the plan to rebuild Greystones Harbour which involved minimising the visual impact on a sensitive coast of a significant development. This involved many trade-offs and has been a success and at many levels.

Yours sincerely
Derek Mitchell



Appendices:

1. Map. Showing needed reduction for Visual Impact reasons.
2. Chart comparing Visual Impact with recent UK Consents.
- 3A Map showing Awel-Y-Mor reduction in Arc of View (Llandudno)
- 3B Map showing reduction in area of Rampion 2, (Brighton).
- 4A Planning Inspectors Decision & facts Awel-Y-Mor.
- 4B Examining Authority Recommendations Rampion 2.



- Legend**
- Arklow Bank Wind Park 2 - Array Area
 - Arklow Bank Wind Park 2 - Cable Corrido And Working Area
 - Arklow Bank Wind Park 1
 - Arklow Bank Wind Park 1 - Met Mast
 - Arklow Bank Wind Park 1 - Export Cable
 - Arklow Bank Wind Park 2 - Wind Turbine Generator Locations (With 100m Limit of Deviation)
 - Arklow Bank Wind Park 2 - Offshore Substation Platform Locations (With 100m Limit of Deviation)
- Sheet 1 of 4 see drawing number AW -SSE-000-CVL-PEV-0009-000
- Sheet 2 of 4 see drawing number AW -SSE-000-CVL-PEV-0010-000
- Sheet 3 of 4 see drawing number AW -SSE-000-CVL-PEV-0011-000
- Sheet 4 of 4 see drawing number AW -SSE-000-CVL-PEV-0012-000

Notes

1. This drawing is issued for planning application purposes only.

2. Arklow Bank Wind Park 1, identified on this drawing in blue, does form part of the Proposed Development site

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Rev	Date	Issue for Planning	Status
02	03/03/2026	Issue for Planning (Revised March 2026)	088
01	28/03/2024	Issue for Planning	088

SSE Renewables

Sure Partners Limi

ARKLOW BANK WIND PARK 2

PROJECT DESIGN OPTION 2 - WIN PARK LAYOUT

Scale	Plot Size	Datum	Projection	ITM
1:50,000	A7	IRENFT05	Projection	ITM

Wind Farm Name	Arklow Bank. Revised			Awel-Y-Mor Llandudno		Rampion 2	
	Brittas Bay	Reduce to 36	existing 7	applied	consented.	Brighton combined with Rampion1	
	applied 47			91	50	proposed	reduced to
Arc of View, degrees	105	70	20	105	75	during consultation	
Distance	7.5km		12.5	over 10.5		80	60
Height, meters	287	287	124			over 10	over 15
		11 northmost					
		turbines deleted					

Llandudno & Brighton are chosen as comparisons as both are recent nearshore consents. Both are next to older windfarms of lesser height and arc of vision, Their angles in this list are combined angles of old & newly consented.

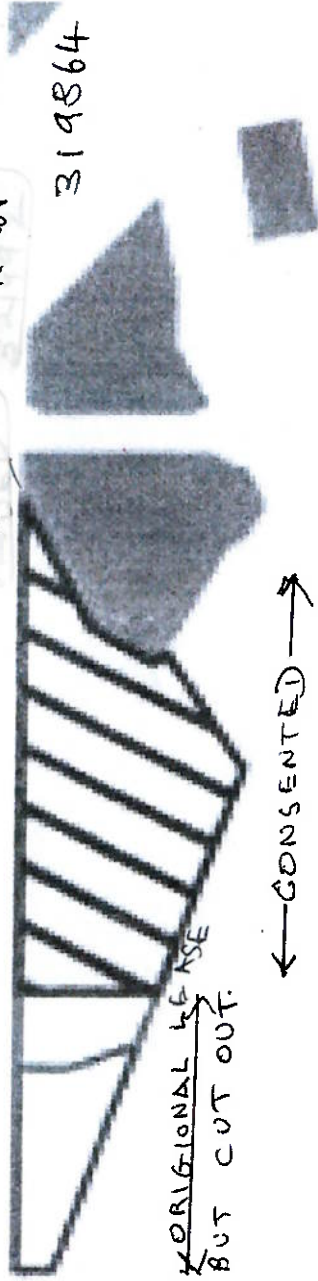
Their consented arc of view is less than originally proposed and about the same as my suggested 36 turbine layout.

They are also further from the coast thus less intrusive.

The Welsh Planning Inspector notes (5.7.37 table 4) that Mitigation measures principally includes reduction in the size of the array area and number of turbines.

Height of relevant objects	metres	
Turbines Arklow Bank, applied	287	
Bray Head	243	SAC & SAAO. The highest object on the East Coast of Ireland
Poolbeg Chimneys	207	
Howth Head	171	
Killiney Hill	153	
Lambay island	126	
Arklow turbines existing height	124	
Wicklow Head	90	
Kish Lighthouse	30	

- Offshore array area per informed consultation at end of 2020 (100km²)
- Reduced offshore array area post-informed consultation (88km²)
- Reduced offshore array area Dec 2021 (post-reduced informed consultation) (78km²)
- Existing wind farms



← CONSENTED →

REDUCED FROM 105° TO 75° FROM LLANDUDNO AND 8.5KM FURTHER FROM ANGLESEA AONB.

Pres

Colwyn Bay

Abergele

St Asa

Dent

Llanfairfechan

Bangor

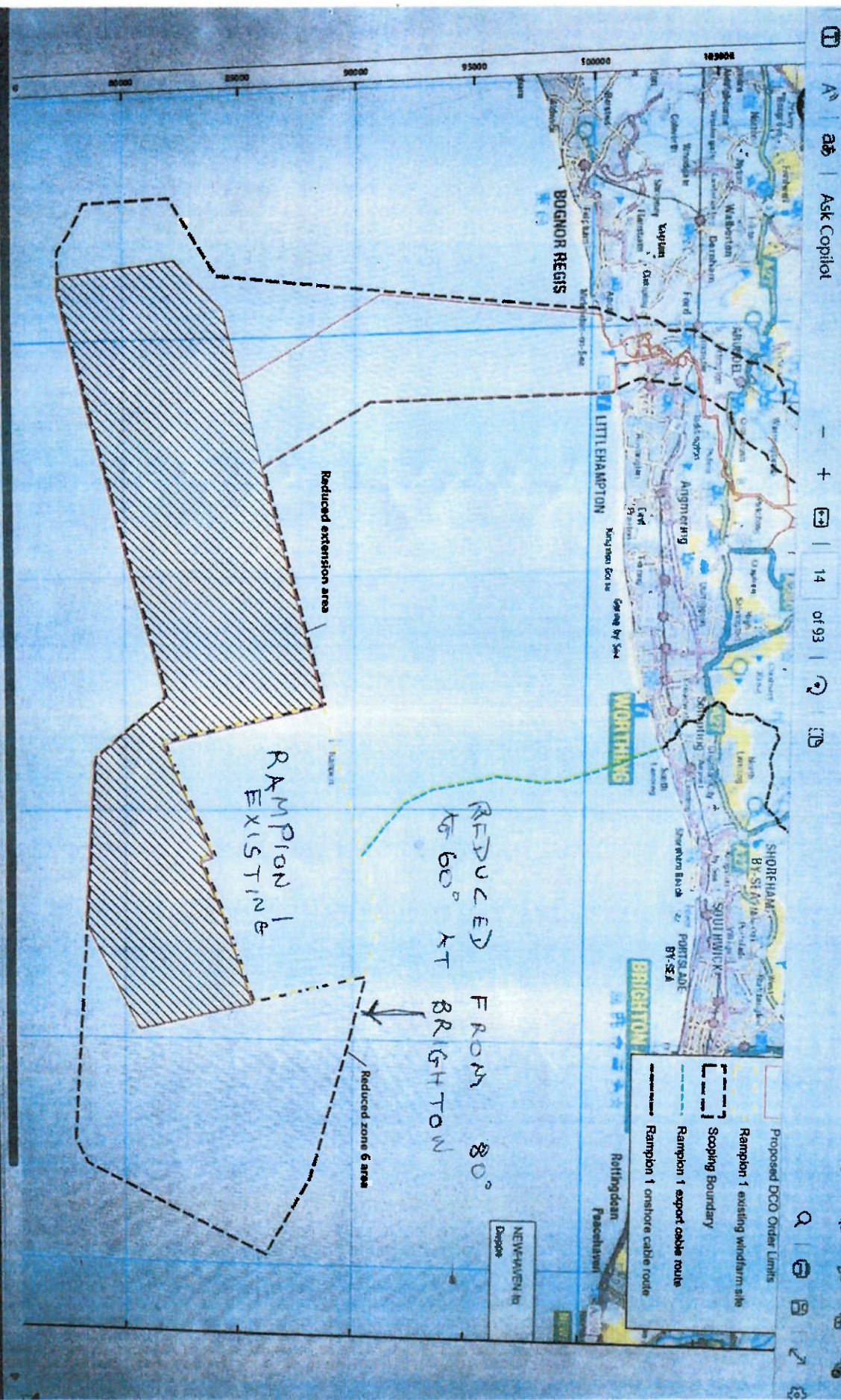
Bethesda

efni

APPENDIX 3B RAMPION 2 REDUCTION

CA 306D ~~306D~~ ARKLOW BANK WINDFARM

structure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010117-000380-6-1%20Rampion%202%20ES%20Volume%...



319864

319864 D. Mitchell Appendix 4A. Reply FI Arklow Bay Wind Park.
Awel-Y-Mor, Llandudno facts & Planning Inspectors Decisions.

Awel Y Mor substantially reduced the array size and number of turbines thus reducing the adverse visual aspect during the consenting process. Awel Y Mor is also further offshore. The reduced Visual Impact is much less than Arklow Bank WF.

In 2023 the Awel y Mor OWF project was consented off the Welsh coast, and is comparable to the AWF Project in many ways. It is located 10.5 km off the coast in the Irish Sea, with a maximum total area of 78 km² and a maximum of 50 WTGs with a tip height of up to 332 m

Awel-Y-Mor Consenting facts.

The Planning Inspectorate Wales: Examining Authority's Report of Findings and Conclusions for Awel-Y-Mor Wind Farm 2023.

5.3.134. The Applicant (post PEIR; Preliminary Environmental Report) reduced the maximum number of WTGs from ninety-one to fifty and reduced the array area from 88 km² to 78 km². A minimum blade clearance of 22m above MHWS is secured in the recommended Development Consent Order (rDCO) R2.

Mitigation 5.7.37. SLVIA [REP8-082] **Table 4 identifies measures considered to be mitigation. This principally includes a reduction in the size of the array area and number of WTG from that of the scoping stage** and within the Preliminary Environmental Information Report (PEIR) as a result of statutory and non-statutory consultation prior to the submission of the application. This has effectively increased the distance of the array area from the IoA coast and AONB by around 8.5km thereby reducing the horizontal field of view and scale of the WTG when viewed from these locations. It has also reduced the horizontal field of view when viewed from other areas, including SNP. In addition, the reduction in size of the array area and number of WTG means that the Proposed Development sits outside of an area of seascape identified in NRW's offshore wind farm guidance³³ as having a high sensitivity to offshore wind farm development, primarily relating to SNP, IoA AONB and CRDV AONB, as shown on ES Figure 2c [APP-193].

Landscape enhancement scheme 5.7.80. The Applicant indicated in response to ExQ1 [REP1-007] and IP representations that it was willing to consider landscape enhancements to assist with offsetting adverse effects on designated landscapes. At ISH2, the Applicant confirmed that some initial discussions had taken place with NRW and relevant NWLPA relating to the scope and principle for a landscape enhancement fund to address impacts on designated landscapes. (The suggested amount of the Landscape Enhancement Scheme is 5m).

Appendix 4B Arklow Bank. Derek Mitchell 319864
Rampion 2 Examining Authority Recommendations, England.
Consented April 2025

3.3.3. The array then went through a series of design refinement processes to ensure the locations of the WTGs did not prejudice, amongst other things, shipping and navigation, ornithology, fishing, other marine users and its visual appearance in seascape and landscape matters. This resulted in the **reduction of the area for the array from its original boundaries** to the Order limits as per this Proposed Development.

3.13.75. The ExA is satisfied that the Applicant has **reduced the Seascape effects as far as possible through reduction in array areas (pre-submission)** of the Proposed Development. The impact upon the Special Qualities of the SDNP have been adequately assessed. □ That the ES contains sufficient evidence to determine the impact upon the Isle of Wight and Chichester Harbour National Landscapes (AONBs which are 31Km away).

A £3.5m compensation fund for works for residual landscape effect on the South Downs National Park. Also other funds for other areas were also agreed during the examination.

Rampion 2 is further from the coast than Arklow Bank windfarm is from Brittas Bay and the angles of view were reduced to 60 degrees during consultation. My proposal that the 11 most Northerly turbines be deleted reduces the angle to 70 degrees and it is considerably closer than Rampion 2.

Rampion 2 Environmental Statement, August 2023. Key changes since the first statutory consultation exercise (2021)

4.1.17 Since the original Preliminary Environmental Information Report (PEIR) (RED, 2021) was submitted in 2021 as part of the first Statutory Consultation exercise, the design of the Proposed Development has continued to evolve and be refined. Full details of the design changes are provided in Chapter 3: Alternatives, Volume 2 of the ES (Document Reference 6.2.3). In summary, the project described in this chapter differs in the following ways from the original PEIR (RED, 2021) Chapter 4: The Proposed Development:

- the Offshore Array Area has been reduced in size and an area of WTGs to the west and south of Rampion 1 has been removed;
- two wind farm separation zones, to the west and south of Rampion 1, were introduced to mitigate visual impacts by separating the Rampion 2 array area from the built Rampion 1 turbines.
- the spatial extent of the Rampion 2 Offshore Array Area has been reduced, which reduces the horizontal spread of turbines and increases the distance of Rampion 2 from the most sensitive areas of coastline (reducing the apparent height and visibility of turbines);
- the overall number of turbines has been reduced from a maximum of 116 to a maximum of 90;