

OBSERVATION ON ADDITIONAL INFORMATION

Arklow Bank Wind Park Phase 2

ACP Reference: OA27.319864-24

Dear Sir/Madam,

We write to inform of our great concern regarding the Wind Park project proposed by SSE off the coast of Wicklow.

We should state that we are completely in favour of the development of alternative energy and are not against projects off the coast of Wicklow. We believe, however, that any such development could, but should not negatively impact on existing natural resources and habitats, including the Arklow Bank itself, the 11 potentially dependent beaches and coastline.

Our family have spent a significant amount of time in Brittas Bay over the last 36 years and the prospect of this avoidable damage and harm is quite chilling. It appears to be highly possible that the disturbance of the Arklow Sandbank could render also the seawater quite toxic and unsafe. What a shameful legacy we would be handing on to future generations. They will not judge this decision solely on how quickly Ireland met its renewable energy and climate targets, but also on whether we had the foresight to protect our natural heritage demonstrating respect for both the environment and the legal safeguards designed to protect it.

SSE has been asked to provide reassurance that its proposed development will not adversely affect these significant areas of national and international concern. The Arklow Bank exists as an Annex I habitat type ('*Sandbanks which are slightly covered by sea water all the time*') and SECPA has also requested that the Bank be designated as a Special Protection Area because of its importance to seabirds.

Article 6(3) of the Habitats Directive, as interpreted by the Court of Justice of the European Union, requires '*a positive finding that any proposed project will not adversely affect the integrity of each relevant European site, assessed in view of its site-specific conservation objectives. The assessment must use the best scientific knowledge available and leave no reasonable scientific doubt*' as to the absence of adverse effects.

The new SSE reports that they have commissioned fall well short in addressing the key issue, namely demonstrating beyond reasonable scientific doubt that their work will do no harm.

Given this range of admitted uncertainty, we believe it is appropriate for the SSE application to be refused. Doing otherwise would clearly leave open the potential for the very damage that European and national legislation seeks to avoid, exposing the State and affected coastal communities to the possibility of a significant environmental, logistical and financial burden should such an outcome materialise.

We also note that the request that SSE address the possibility of alternative sites for the proposed development has not been answered.

We are aware of the Source Galileo-owned Mac Lir Wind Farm, a proposed development south-east of Arklow whose turbines would be located more than 22 kilometres from the east coast and entirely outside Ireland's 12-nautical-mile foreshore limit. This limit, were it applied to the SSE proposal would surely address our real anxieties as outlined above.

In short, SSE has failed on two fronts:

- to satisfactorily deliver on the central legislative requirement of demonstrating beyond reasonable scientific doubt that its proposed development will not adversely affect the integrity of designated protected areas and the species and habitats for which they are protected; and
- to address satisfactorily the question from An Coimisiún Pleanála regarding the possibility of developing the project at an alternative and potentially less environmentally damaging location.

We strongly suggest, therefore, that SSE should be refused permission to progress any further with their Arklow Bank proposal.

Yours faithfully,

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