

From: [Ian Young](#)
To: [Marine](#)
Subject: Arklow Bank planning observation
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Attachments: [Arklow Bank Observation.docx](#)

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Hello.

Further to my precious submission, please see attached my response to the recent submission by SSE.

Many thanks.

Ian Young (address supplied).

I am completely in favour of the development of alternative energy and am not against projects off the coast of Wicklow. I believe, however, that any such development should not—and need not—interfere with or compromise existing natural resources and habitats, including the Arklow Bank itself, the 11 potentially dependent beaches and coastline, and the various species that depend upon either or both for survival.

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.

Indeed, within the submissions from SSE and its contractors, there are numerous acknowledgements of uncertainty and limitation.

Given this range of admitted uncertainty, I 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.

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

While the boundaries of the maritime area within which SSE is authorised to operate may impose limitations, and while SSE would clearly prefer to build fixed-bottom foundations on the shallow Arklow Bank, it could have addressed the substance of the question by examining whether the development could be located further offshore, using an appropriate foundation technology and in an area presenting a lower environmental risk (which they have, I believe, successfully done in other jurisdictions).

They could also have mentioned the Source Galileo-owned Mac Lir Wind Farm, a proposed development south-east of Arklow whose turbine array would be located more than 22 kilometres from the east coast and entirely outside Ireland's 12-nautical-mile foreshore limit.

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.

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

Ian Young

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