



Outlook

ACP Ref 319864-24 - Observation for Additional Information supplied by SSE

From Jasmin Hourie <jahourie@gmail.com>

Date Mon 7/27/2026 11:59 AM

To Marine <marine@pleanala.ie>

 1 attachment (220 KB)

J H Bord Pleanala submission ABWP2 27-July 2026.pdf;

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For the attention of Honor Caird Marren

Dear Ms Caird Marren,

Please find attached a further observation in respect of the additional information submitted by SSE Renewables in response to the queries raised by An Coimisiún Pleanála.

I previously made a valid written observation on the Arklow Bank Wind Park 2 application and understand that no additional fee is required for this further submission.

Yours faithfully,

Jasmin Hourie

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27th July 2026

Sent by email to marine@pleanala.ie

OBSERVATION ON ADDITIONAL INFORMATION

Arklow Bank Wind Park Phase 2

ACP Reference: ABP-319864-24

Dear Sir/Madam,

I am a local resident with a long connection to Brittas Bay and the Wicklow coast. I previously made an observation on this application because I am concerned that a very large industrial development is proposed on a shallow and dynamic offshore sandbank close to beaches, dunes, protected habitats and coastal communities. This is an area of outstanding natural beauty.

I support renewable energy and accept that Ireland needs offshore wind. My objection is not to offshore wind in principle. My concern is that this particular project is in the wrong location. In my view, the additional information submitted by Sure Partners has not given the public a clear and reliable assurance that the project will not damage Arklow Bank, the adjoining coastline, wildlife, bathing water, tourism or the natural character of the area.

I am not a scientist or a lawyer. I am therefore asking the Commission to examine the application from the practical point of view of a resident who depends on the coast to remain healthy and who expects the developer to prove that serious or irreversible harm will not occur before permission is granted.

1. Further information has not removed the central uncertainty

The Applicant relies heavily on computer modelling to conclude that the wind farm will have no appreciable effect on the long-term behaviour of Arklow Bank or the surrounding coast. I understand that models are useful, but they are simplified forecasts of a very complicated natural system. A model cannot reproduce every storm, current, wave direction, sediment movement or change that may occur during the full life of the development.

2. The modelling period is shorter than the life of the development

The material submitted indicates that the long-term morphodynamic modelling extends for about 20 years, while the infrastructure may remain in the marine environment for approximately 36.5 years. That difference is important to an ordinary member of the public. I do not understand how a 20-year simulation can provide certainty about the behaviour of a development that will remain in place for substantially longer, particularly on a mobile sandbank.

3. A small, predicted effect may be hidden by a larger uncertainty

The Applicant says that the difference between the future development of the Bank with the wind farm and without it will be very small. However, I have not seen a clear overall margin of error, confidence range or probability attached to that conclusion. The basic concern is simple: a model cannot reliably distinguish an environmental effect that is smaller than the uncertainty within the model itself. The Commission should therefore ask what the probability is that the Applicant's central conclusion is wrong, what the consequences would be if it is wrong, and who would bear the resulting cost.

4. The consequences of an error would fall on the public and the environment

If the prediction is wrong, the cost may not be borne mainly by the developer. It could be borne by residents, tourism businesses, property owners, the State and future generations through increased erosion, altered sediment movement, damage to beaches and dunes, poorer water quality, loss of wildlife habitat and reduced coastal amenities. Some of those effects could be permanent or impossible to reverse.

5. Brittas Bay and the connected coastline require special care

Brittas Bay is a major public, environmental and tourism asset. Its beaches, dunes, bathing waters and natural landscape support recreation, local employment, holiday accommodation and the wider visitor economy. It is part of a connected coastline that includes Silver Strand, Magheramore, Magherabeg, Jack's Hole, Buckrone, Ennereilly, Clogga, Kilmichael, Kilpatrick and Kilgorman. Protected areas in this wider system include Buckrone-Brittas Dunes and Fen SAC, Magherabeg Dunes SAC, Kilpatrick Sandhills SAC, Wicklow Reef SAC, Wicklow Head SPA and The Murrough SPA.

6. Arklow Bank is not an empty construction site

Arklow Bank is a large offshore sandbank and a natural habitat. Sandbanks are slightly covered by sea water all the time and are a habitat type recognised under Annex I of the Habitats Directive. The Bank also supports birds, fish and other marine life. Even where the Bank itself is not designated as an SAC, that does not make it environmentally unimportant or suitable for industrialisation without a high level of scientific certainty.

7. Seabed disturbance and bathing-water concerns remain

The project would involve extensive disturbance of the seabed for foundations, cables, boulder clearance, sandwave clearance and scour protection. The Applicant predicts that disturbed sediment will disperse and that effects will be temporary or localised. As a resident, I remain concerned about sediment plumes, the possible movement of contaminants, effects on marine habitats and the reputation and quality of local bathing waters. Brittas Bay depends on clean water and public confidence. Even a temporary deterioration could affect visitors and local businesses.

8. Monitoring after permission is not enough

I am concerned by any suggestion that uncertainty can be managed mainly through monitoring after construction begins. Monitoring can record a change after it has occurred, but it cannot restore a beach, dune system, habitat or sediment pathway. The required assessment should be completed before consent, not left to be discovered during or after construction.

9. Wildlife and underwater noise

The Arklow Bank and the surrounding sea are used by seabirds and marine mammals and support fish and other marine species. I remain concerned about collision risk, displacement from feeding areas, piling noise, construction disturbance and the cumulative effect of this project together with other proposed offshore developments. These matters should be resolved by reliable evidence before permission is granted.

10. Tourism, seascape and the character of the coast

The proposed turbines would be very large and close enough to become a major feature of the seascape. Brittas Bay and the wider coast are valued because of their open, natural relationship with the sea. The visual and perceived industrialisation of the nearshore environment should not be treated as a minor issue. The established tourism and amenity value of this coastline should not be placed at risk where less damaging locations may be available further offshore.

11. A genuine alternative-location assessment is required

I do not believe that the historic selection of Arklow Bank should decide the issue now. The correct question is whether a project of this scale could be located further offshore and away from a shallow, dynamic sandbank and sensitive coastline. A genuine assessment of alternatives should not be limited to the area already available to the Applicant or to the technology it prefers. Ireland has a large maritime area, and renewable-energy objectives should be pursued at locations that reduce environmental and community risk.

12. The public consultation period has been difficult for ordinary residents

The revised material is very extensive and highly technical. The developer and its professional advisers had substantial time and resources to prepare it, while individual residents and community groups have had a much shorter period in which to understand and respond. Effective public participation requires more than making documents available. The public must have a realistic opportunity to understand the information and make meaningful observations.

SSE have not answered these questions

- Has the Applicant shown that the uncertainty within its model is smaller than the environmental change it claims will be negligible?
- What is the probability that the central prediction of no appreciable effect is wrong?
- What would happen to the Bank, beaches, dunes, bathing waters and protected habitats if that prediction is wrong?
- Who would pay for remedial work, compensation or coastal protection if damage occurs years after construction?
- Has the full construction, operational and decommissioning period been assessed, including severe storms and cumulative effects?
- Has a genuinely less damaging location further offshore been examined on an equal basis?

Conclusion and request

I remain supportive of responsible offshore renewable energy, but I do not believe the Applicant has provided the degree of certainty needed for a project of this scale in this location. The possibility of permanent damage to a natural sandbank, protected coastal habitats, bathing waters, wildlife, tourism and public amenity should not be accepted on the basis of predictions whose overall uncertainty has not been clearly quantified.

I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Arklow Bank Wind Park Phase 2 in its present location. The Applicant has not provided independent and scientifically robust evidence demonstrating that adverse effects on Arklow Bank, coastal processes, European sites, water quality, wildlife and the Wicklow and Wexford coastline can be excluded to the legally required standard.

Renewable energy is necessary, but it should be developed in a way that does not create a new environmental problem while attempting to solve another one.

Yours faithfully,

Jasmin Hourie

Date: 27th July 2026