

Observation - An Coimisiún Pleanála - Case reference: OA27.319864

Date: 29/07/2026

Observer Name: John Wolohan

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Reasons/Arguments against proposed development

1. Water Quality (Public Health/ Flora & Fauna Health /Economic Consequences):

- The construction of the proposed development will cause significant disruption to the sandbank and will take course over an estimated 5 plus years.
- The Avoca river flows from Arklow out to the sandbank. This river has been subject to high levels of pollution throughout recent history with sources including the copper mines in Avoca and former fertiliser plant outside Arklow Town. Additionally, Arklow was without a wastewater treatment plant until recently which resulted in sewage being pumped directly into open.
- I believe that the information provided for this development does not adequately assess whether the sandbank contains contaminated sediment, particularly at deeper levels which will be disrupted by construction but not by current weather conditions etc, and if construction will result in this contaminated material coming loose and entering the sea water and being carried towards shore (which would make sense seeing as existing tides and currents transport higher level / surface level sand from the sand bank to the coast (but not the deeper layers which may contain said contaminated material).
- This could potentially result in poor water quality on the Wicklow coast for several years and the waters being unsafe for people to swim in. Does the applicant or the State have measures in place to provide for this and adequately police the area to ensure people are not endangering their health and are aware of the dangers as well as risks posed to animal and plant life.
- This potential closing off of the Wicklow and Wexford coastline could have severe economic consequences for businesses and communities that rely on the sea such as local caravan and camping parks, restaurants, surf schools, fishermen as well as the hundreds of thousands of people that would be deprived of swimming and availing of public beach and water amenities. This could results in loss of revenue and jobs and a reduction in quality of life at a minimum, nevermind the consequences of severe health issues posed by swimming in polluted waterways.

- The fact that these risks are not proved to exist by the applicant is, in my opinion, grounds for the development to be refused permission or at least delayed until they can study the matter and provide independently verified evidence that the development will not pose a threat to water quality during the construction phase (or thereafter) and that these risks could be avoided by developing turbines further out to sea in less risky developments as the mother company of the applicants (SSE) are already doing in other jurisdictions.

2. Economic Consequences:

- The information provided by the applicant and their general marketing of the development centres around perceived economic benefits and job creation.
- Notwithstanding the misleading “positive economic benefits” including that the jobs will likely be temporary and require expertise not available in the local area and that there is no obligation to sell energy exclusively to the Irish market (so own resources may end up being used to provide energy to other markets unless we surpass their offered prices), there are likely severe negative economic consequences due to this development, particularly for the domestic economies in Wicklow and Wexford.
- As mentioned, the development will potentially result in severe disruption to coastal areas with recreational and commercial water uses at risk of being unusable. Seafront tourism is a major part of the economies of coastal Wicklow and Wexford with hotels, camping, mobile home and caravan parks bringing tens of thousands of visitors to the area every summer, creating hundreds of jobs and supporting small businesses.
- The current coastal environment further supports the economy with numerous golf courses and other recreational uses such as beaches and coastal walks. The information provided by the applicant does not sufficiently prove that the development will not damage the existing coast. The damage could radically alter the local economies including areas such as Brittas Bay which has been a popular tourist location for decades.
- This development could essentially result in the closure of all caravan parks in the Wicklow / Wexford area as well as the businesses (restaurants / landscaping companies / shops) that benefit from the tens of thousands of visitors they bring to the areas resulting in heavy job losses as well as the closure of other coastal businesses and amenities (Brittas Bay Beach, the European Golf Club etc). All these businesses and jobs rely strongly on use of the coastal beaches and coast in their current form and negative disruption caused by noise, water and visual pollution from the development, either permanently or, at best, for 5 years, will destroy the local economy in these areas and small family run businesses. This could all be offset by either further due diligence by the applicant to prove the development process will not damage or negatively impact coastal areas or by adjusting the development such as moving it further away from shore where the risk of damage to the sandbank and coast and other forms of disruption may be less severe.

3. Inequal treatment between the applicant and the general public

- The applicant has had approximately 1 year to provide this further information.
- Even allowing for the disparity in the financial resources available to the applicant versus the average individual citizen, it is unfair that only an 8 week timeframe to analyse the further information. Given the size of the further information and the wide range of topics covered in it, it is unrealistic to expect an average individual to be able to sufficiently analyse it and avail of relevant technical expertise or learn such knowledge themselves in such a short timeframe.
- This appears to be in contravention of the Aarhus Convention which aims for individuals to be treated equally to larger corporate entities with regards to a range of areas including treatment in development processes and engagement.
- As such, I believe that it is only fair to extent the timeframe for further public observations to at least that which it took the applicant to submit the further information after being requested to do so.
- Additionally, it would be helpful for online, open access information / education on the development processes and topics covered in the further information and development application to be provided so as to allow the general public to make better informed decisions about proposed developments.