

SSE has been asked to provide reassurance that its proposed development will not adversely affect 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") so must be protected.

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

Given this uncertainty, I believe it is appropriate for the SSE application to be refused.

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

They could have addressed 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).

SSE has failed on two fronts:

- to demonstrate 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 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.

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