
Further Observation – Case Ref OA27-319864 – Arklow Bank Wind Park 2

From Lucy McGilligan <lucymcgilligan@hotmail.com>

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To Marine <marine@pleanala.ie>

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Lucy McGilligan

The Apartment Kernow, 3 Mile Water, Cullen Lower, Co. Wicklow A67 WD30

Email: lucymcgilligan@hotmail.com

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1, D01 V902

Wicklow, 22 July 2026

Re: Case Reference OA27-319864 – Further Observation on Additional Information (Request for Further Information response, Revised March 2026) – Proposed Offshore Wind Energy Development, Sure Partners Limited – Arklow Bank Wind Park 2

Submission by: Lucy McGilligan

Note: I made a valid written submission on this application on 6 August 2024 (Case Reference OA27-319864). As an existing submitter, no further fee applies to this observation.

To whom it may concern,

I made an observation opposing this application in August 2024 (Case Reference OA27-319864). I am now submitting this further observation in response to the additional information published by Sure Partners Limited (SSE Renewables) in June 2026, comprising the revised Environmental Impact Assessment Report (EIAR), the revised Natura Impact Statement (NIS) and the Applicant's Response to Observations, all dated

March 2026, and following on from the Request for Further Information (RFI) issued in April 2025.

Having reviewed this additional material, I remain firmly opposed to the development. Nothing in the newly submitted documentation removes my concerns, and in several respects it confirms that the risks I raised in 2024 have not been resolved, only re-modelled. I set out below why this additional information does not, and cannot, guarantee that no damage will be done to the sea, the coastline, the designated SAC at Magherabeg, or to marine and coastal wildlife during construction.

1. The additional information is self-produced and has not been independently verified

The revised EIAR and NIS were prepared by consultants engaged and paid by the developer, in direct response to the questions the planning authority itself found necessary to raise via the 2025 RFI. The fact that a Request for Further Information was required at all confirms that the original 2024 submission was not adequate to demonstrate no significant effect on the environment. The developer's response to that RFI is, again, an internal exercise: more desk-based modelling, drawing on the developer's own aerial, marine and geotechnical surveys, without third-party or state-commissioned field verification of the baseline condition of the Arklow Bank and the coastline since 2004. I renew my original request that An Coimisiún Pleanála and the relevant state bodies commission an independent EIAR and NIS, with third-party oversight, before any decision is made.

2. Magherabeg Dunes SAC has not been cleared of risk — it has been "screened in" for further assessment

The developer's own Natura Impact Statement screening documentation (Revised March 2026) lists Magherabeg Dunes SAC, together with Wicklow Reef SAC and Blackwater Banks SAC, among the sites carried forward for detailed Stage 2 Appropriate Assessment because a likely significant effect could not be excluded at screening stage. This is not a clean bill of health for Magherabeg. It is an acknowledgement, in the developer's own words, that a credible pathway of effect on this SAC exists and requires further scrutiny.

This matters because Magherabeg Dunes SAC (site code 001766) is already a fragile and actively eroding site. The National Parks and Wildlife Service's own conservation objectives documentation for Magherabeg records ongoing erosion of the foredunes by wind and sea in the southern part of the site, with no corresponding depositional stage, and a measured loss of fixed coastal dune habitat along a stretch of the southern site in recent years. A site that is already losing ground under natural conditions is precisely the kind of site where additional sediment disturbance, altered tidal flow, or changes to the sandbank profile could tip a slow, natural process into a much faster, irreversible one. Nothing in the additional information provides new, independently gathered field evidence to rule this out.

3. The coastal erosion and seabird conclusions remain the developer's own conclusions

Public reporting on this update confirms that the revised assessments, based on additional aerial, marine and geotechnical surveys commissioned by SSE, conclude that the project's effects on coastal erosion and seabird populations are "not significant" in EIA terms. I do not accept this at face value. The same developer group's Phase 1 development in 2004 was followed by a Dumping at Sea licence in 2016 to remove

100,000 tonnes of sand that had built up on the eastern side of those seven turbines, and by measurable, ongoing loss of foredune and sand along the beaches south of the site, including at Magheramore, Magherabeg and Brittas Bay South. A brand-new self-assessment that things will be fine this time, for a project many times the scale of Phase 1, does not amount to a guarantee, particularly where the underlying tidal current and sediment transport data has previously been shown to have been understated.

4. Wildlife protection during construction remains inadequately addressed

The scale of construction activity is unchanged in kind, even with the turbine count reduced from 56 to 53. Pile driving, cable trenching across roughly 190km of subsea cabling, dredging and sandwave levelling, and vessel traffic on this scale will still generate sediment plumes, underwater noise and physical disturbance across multiple construction seasons. The additional information does not remove the risk to:

- Marine mammals (harbour porpoise, seals, and cetaceans covered by ASCOBANS), for whom sonar mapping and pile driving cause disorientation and displacement into busier shipping and construction traffic;
- Red- and amber-listed seabirds foraging from the Wicklow Head SPA, including Kittiwake and Red-throated Diver, exposed to collision risk and loss of foraging area during the works;
- Reef species at Wicklow Reef SAC, including the Honeycomb Worm reef, which is highly sensitive to increased turbidity and sediment suspension from dredging; and
- The wider inshore nursery and spawning grounds within the 22km band of the coast, relied on by herring, sand eel and mackerel, and in turn by the fish, porpoise, dolphin and whale species that feed on them.

An assessment that concludes effects are "not significant" is not the same as a guarantee of no damage. It is a prediction, made by the developer's own consultants, for a construction process that will run over several years in a live marine environment.

5. Alternative, less sensitive sites still have not been properly examined

The revised documentation continues to proceed from the developer's existing Maritime Area Consent for this specific site, rather than from a fresh, independent site-selection exercise. The site was earmarked under a 2002 foreshore lease, long before the scale of the current 800MW proposal, or today's turbine technology, existed. Since then, deeper-water sites east of the Arklow Bank, including the area validated by the 2023 geophysical survey for the Mac Lir Offshore Wind Farm, have been shown to be suitable for fixed-bottom foundations without the same proximity to Magherabeg, Wicklow Reef and the other designated sites. The additional information submitted this year does not include a comparative assessment of such alternatives, and I do not accept that a project of this scale and permanence should proceed on a live Annex I sandbank simply because the consent for this site already exists.

6. The modelling itself does not support a confident conclusion of no appreciable effect

The developer's conclusions rest on numerical modelling of an exceptionally dynamic sandbank system. No clear overall margin of error or confidence range has been provided to show that the predicted effect is genuinely smaller than the uncertainty inherent in the model. I am also concerned that the morphodynamic simulation underpinning these conclusions covers a period of around 20 years, while the

development itself is expected to remain in place for approximately 36.5 years. I ask the Commission to require the developer to explain how effects over the remaining 15-plus years of the project's life can be excluded with any confidence on the basis of a 20-year model.

This leads to the central question I believe the Commission must weigh: what is the probability that the developer's central conclusion is wrong, what would the environmental consequences be if it is wrong, and who would bear the resulting cost? That cost would not fall on the developer. It would fall on this coastline, on the wildlife and habitats that depend on it, and on the communities, including my own, who live alongside it.

7. Seabed disturbance, water quality and bathing water have not been sufficiently addressed

Foundations, cable-laying, boulder clearance, sandwave clearance and scour protection will disturb large areas of seabed over the construction period. Statements that disturbed sediment will disperse rapidly do not, on their own, demonstrate that this material, and any contaminants presently contained within it, will cause no harm to water quality or to bathing waters along this coast. I ask that this be assessed and demonstrated with the same rigour as the ecological impacts, rather than assumed.

8. Post-consent monitoring is not a substitute for assessment before permission is granted

The additional information places weight on post-construction monitoring as a safeguard. Monitoring can identify damage only after it has occurred; it cannot restore altered sediment pathways, eroded beaches and dunes, or degraded habitats once the harm is done. Under EU law, permission affecting protected European sites must be based on complete, precise and definitive findings capable of removing reasonable scientific doubt before consent is granted, not on an undertaking to watch and see afterwards. Where that doubt remains, the precautionary principle requires that the site be protected, not that permission be granted on the expectation that any damage will be caught and managed later.

9. The public consultation period has not allowed genuinely effective participation

The additional information submitted this year is extensive and highly technical, yet the public has been given eight weeks to review, understand and respond to it, while Sure Partners itself was granted a three-month extension to prepare its response to the original Request for Further Information. This imbalance raises real concerns about whether the public has been given a genuinely effective opportunity to participate, as required under the Aarhus Convention, which obliges reasonable timeframes allowing the public sufficient time to become informed and to participate meaningfully in environmental decision-making of this kind.

10. Wider recognition of the sandbank habitat and tourism value of this coastline

Sandbanks slightly covered by sea water at all times are recognised under Annex I of the EU Habitats Directive as habitat type 1110, a habitat of European conservation importance, even where a particular sandbank such as Arklow Bank is not itself designated as an SAC. This underlines the ecological sensitivity of the feature the developer proposes to build upon. I would also highlight that this coastline, including Brittas Bay and the beaches south of Wicklow Head, supports tourism, recreation,

hospitality and local employment, and that the open, natural seascape is part of what draws people to this area. This amenity and economic value should not be treated as a secondary consideration alongside the ecological concerns set out above.

Conclusion

The additional information submitted in 2026 answers technical questions the planning authority itself considered outstanding. It does not, and cannot, guarantee that no damage will be done to the sea, the coastline, Magherabeg Dunes SAC, or to marine and coastal wildlife during construction. On the developer's own documentation, Magherabeg remains a site where a likely significant effect could not be excluded and requires further assessment, and that assessment continues to rest entirely on the developer's own consultants and survey data.

I said in 2024 that we have the opportunity and the duty to be the guardians of this rare, fragile and beautiful site, and nothing in this additional information has changed my mind.

There should be no possible outcome other than refusal of a project which carries risks of this magnitude to a coastline we cannot get back once it is gone.

I ask An Coimisiún Pleanála to refuse this application, or, at minimum, to commission independent, state-verified field assessment of the current condition of the Arklow Bank and the Magherabeg, Wicklow Reef and Buckroney/Brittas Dunes & Fen SACs before reaching any decision.

I maintain every point made in my original observation of August 2024, which I ask to be read alongside this submission.

Let us not fail Magheramore, Magherabeg, Arklow Bay and our beautiful coastline.

Yours sincerely,

Lucy McGilligan

