

Observation to Additional Information provided by SSE to ACP

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OBSERVATION ON ADDITIONAL INFORMATION

Arklow Bank Wind Park Phase 2
ACP Reference: ABP-319864-24

Dear Sir/Madam,

I am writing on behalf of our family business, O'Driscoll's Caravan Park, located in Brittas Bay, County Wicklow.

Our parents established the business in June 1969, and we have been welcoming families to the Wicklow coast for over 55 years. Many of our customers are now second- and even third-generation tenants whose families have returned year after year, some staying up to six months each year. We have built lasting relationships with our customers and have developed a deep connection to Brittas Bay and its unique coastal environment. Our livelihood depends on the continued health, beauty and reputation of this coastline.

We support Ireland's transition to renewable energy and fully accept that offshore wind will play an important role in achieving our national climate objectives. Our objection is not to offshore wind as a concept. Rather, it is our sincere belief that this particular project is proposed in the wrong location.

We remain deeply concerned that a very large industrial development is proposed on a shallow and highly dynamic offshore sandbank situated close to beaches, dunes, protected habitats and coastal communities. Having carefully considered the additional information submitted by SSE, we do not believe it provides the public with clear, reliable or convincing assurance that the project will not adversely affect Arklow Bank, the adjoining coastline, wildlife, bathing waters, tourism or the natural character of this exceptional area.

We are also concerned by the consultation process. The public has been asked to examine an exceptionally large and highly technical volume of revised documentation within an eight-week consultation period. By comparison, SSE was given six months, they requested and were granted a three-month extension, giving them nine months to prepare its further information response. This imbalance raises legitimate concerns about whether the public has been afforded a genuinely fair and effective opportunity to understand, assess and respond to the material. The Aarhus

Convention requires that members of the public be given reasonable time to become informed, prepare their submissions and participate effectively in environmental decision-making. We do not believe that standard has been achieved.

A central concern is that SSE's conclusions rely heavily on numerical modelling of an exceptionally dynamic offshore sandbank. Where the predicted impacts of Phase Two are extremely small, yet the uncertainty within the modelling may exceed the magnitude of those predicted effects, the modelling cannot reliably support a conclusion that there will be "no appreciable effect." Scientific uncertainty of this nature should not be overlooked when decisions of such significance are being made.

If their conclusion proves to be incorrect, the consequences will not primarily be borne by the developer. Instead, they may be borne by local communities, future generations, the State and the natural environment through increased coastal erosion, altered sediment movement, damage to beaches and dunes, deterioration of water quality, disturbance of protected species and the loss of valuable coastal amenities upon which businesses such as ours depend. This would be detrimental to our business.

In our view, SSE has also failed to demonstrate with sufficient certainty that the large-scale disturbance, excavation and redistribution of seabed material will not adversely affect water quality, bathing waters or release contaminants currently contained within marine sediments. General statements that disturbed material will disperse rapidly are not, in themselves, evidence that no environmental harm will occur.

European environmental law requires that any permission affecting protected European sites be based upon complete, precise and definitive scientific findings capable of removing all reasonable scientific doubt. Where such doubt remains, the precautionary principle requires that protection of the environment takes precedence over assumptions, optimism or reliance on future monitoring to identify problems after they have occurred.

Our family has invested more than five decades in building a successful tourism business in Brittas Bay. We have witnessed firsthand the importance of this coastline to local families, visitors, wildlife and the wider economy. We owe it to future generations to ensure that decisions made today are based on sound science, robust evidence and proper precaution.

Future generations will not thank us if decisions are rushed in pursuit of renewable energy targets at the expense of one of Ireland's most valuable and environmentally sensitive coastlines. Renewable energy and environmental protection should go hand in hand. We respectfully ask that the proposed development be assessed with the highest level of scientific scrutiny and that the precautionary principle be fully applied before any irreversible decisions are made.

We therefore request that ACP refuse permission, or require further independent assessment, unless and until SSE provides scientifically robust evidence demonstrating that the project will not adversely affect Arklow Bank, coastal

processes, water quality, protected habitats, wildlife or the integrity of the adjoining Wicklow and Wexford coastline.

Yours faithfully,

Mary O'Driscoll on behalf of the directors of O'Driscoll's Caravan Park Ltd