
Case Reference: OA27.319864 Response to Request for Further Information

From Olivia Cafolla <oliviacafolla@gmail.com>

Date Wed 7/29/2026 11:54 PM

To Marine <marine@pleanala.ie>

 1 attachment (462 KB)

Olivia Cafolla & Family_319864.docx.pdf;

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Dear An Coimisiún Pleanála Officers,

Please find attached my submission in respect of Arklow Bank Wind Park Phase 2 (An Coimisiún Pleanála Case Reference: OA27.319864) Response to Request for Further.

Kind Regards,

Olivia

Offices of An Comisuin Pleanála,
64 Marlborough Street,
Dublin 1

Dated: 29th July 2026

Re: Case Reference OA27-319864 Proposed Offshore Wind Energy Development Sure Partners Limited - Arklow Bank Wind Park Phase 2

Submission By: Olivia Cafolla & Family

Name: Olivia Cafolla

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Email: oliviacafolla@gmail.com

To whom it may all concern,

I wish to make an observation **opposing** the Planning Application submitted by Sure Partners Ltd (SSE Renewables) for permission to develop an offshore wind energy development - Arklow Bank Wind Park 2 - on the Arklow sandbank in Co. Wicklow.

I have been a resident of Brittas Bay since 1982. I am witness to significant changes in the coastline since 2016. These changes are primarily accreted erosion at the south end of Brittas Bay beach that is not evident near the Ballinacarrig. I have documented this erosion through photographs taken in 2017, 2020 and 2025 (see attached).

Most people who have swum at Brittas Bay or walked the Wicklow coast have never thought about what lies beneath the surface of the Irish Sea just offshore. Why would they? There is no specific requirement in Ireland's primary, Junior Cycle or new Leaving Certificate Geography curriculum for students to learn about marine sandbanks as a habitat, even though the State's own environmental authorities recognise sandbanks as a distinct marine habitat of European conservation importance, and Arklow Bank is specifically identified as one of Ireland's east-coast sandbanks. In other words, a student could successfully complete Junior Cycle Geography knowing about marine processes without ever having learned: "There is a large sandbank called Arklow Bank off the coast of Wicklow."

With further desk research, I learned [naturally occurring oysters beds](#) existed on the Arklow Bank in the late 1700s. These natural beds didn't just provide oysters for many artificial Irish beds, but also for others in Britain, Jersey, Holland and France.

At the recent EU Ocean Conference in Wexford, Alexandra Cousteau, granddaughter of Jacques Cousteau, the legendary French explorer, conservationist, and filmmaker. His most famous philosophy was: "We only protect what we love, we only love what we understand, and we only understand what we are taught".

The National Parks and Wildlife Service identifies "sandbanks slightly covered by seawater at all times" as a distinct marine habitat. It identifies Arklow Bank among Ireland's east-coast sandbanks and describes the biological communities associated with shallow sandy sediments, including fish, crustaceans, molluscs, sand eels and seabirds. The NPWS also identifies sandbanks as an Annex I habitat under the EU Habitats Directive.

In other words, the State recognises the sandbank as an ecologically significant marine habitat in its environmental policy and law, while the school curriculum does not specifically require children to learn about it.

If citizens are expected to participate in decisions about transforming marine environments, has the Irish government given them the basic geographical and ecological knowledge necessary to understand what is being transformed?

This is particularly important in the context of the Aarhus Convention, which is built around environmental information, public participation and access to justice. Meaningful participation cannot simply mean giving citizens access to technical documents and asking them to respond. It requires environmental information to be accessible and understandable enough for the public to participate effectively.

What needs to happen

European law on protecting wildlife habitats says that before a major construction project is approved, the scientific evidence must contain no reasonable scientific doubt about the impact on protected animals. That is a very high standard. It exists for good reason; once an underwater habitat is destroyed, it cannot be put back.

The Commission must require full disclosure of every financial link between environmental groups and wind developers before accepting their data as independent evidence.

The risk of uncertainty is too high

SSE says the wind farm will not damage the sandbank. They base this on computer models. But they have not shown that those models are accurate enough to detect the damage they are claiming will not happen.

Think of it this way. If your scales are only accurate to the nearest kilogram, you cannot use them to measure something that weighs a few grams. The measurement tool is too rough to detect the thing you are trying to measure. SSE's models may have the same problem — the uncertainty in the model could be bigger than the effect the model says is negligible. If that is true, the model cannot actually tell the difference between harm and no harm.

If SSE's prediction turns out to be wrong, SSE will not pay the price. The beaches will change. The wildlife will be disturbed. The tourism businesses along the Wicklow coast will lose visitors. The state will face the cost of a damaged protected habitat. And the sandbank — which took thousands of years to form — cannot be put back.

EU law says a wind farm cannot be built on a protected site unless it can be proven beyond reasonable scientific doubt that no harm will result. SSE has not proven that. It has produced models with uncertainties it has not fully explained, and called the result good enough.

This is not good enough. And I do not believe An Coimisiún Pleanála should accept it as such.

Every decision about where to build energy infrastructure is also a decision about who benefits and who pays the price. A data centre gets cheap clean electricity. A family in Wicklow loses their beach. A harbour porpoise gets pile-driven out of its feeding ground. These are not accidents. They are choices and they should be made openly, with full information, with people having a real say, and with courts available if the decision breaks the law.

If the consent is granted, the turbines go in, and the damage SSE's own documents acknowledge as likely actually happens, to the sandbank, to the coastline, to a harbour porpoise population already assessed by NPWS as being in inadequate conservation status, who bears the cost? Not the developer. The state, the taxpayer, the communities whose coastline has changed, and the critical ecosystem with no voice in the process.

The Arklow Bank is a 'headland associated' sandbank, one of only two in Ireland, the other being the Burford Bank just out from Dublin Bay. There are studies ([Impact of a headland-associated sandbank on shoreline dynamics | Request PDF \(researchgate.net\)](#)) that shows if the elevation of such sandbanks is altered, it can cause serious sediment/sand shift on the parallel coastline. When they are highered it causes sand to be shifted off the beach, while lowering will deposit more sand onto the beach. Since 2004, following the installation of 7 turbines on the Arklow Bank, sand has gradually disappeared off the little beach down from Ardinary and there has been a significant loss of sand on the south beach of Brittas Bay, evident from the exposed rocks near the water's edge which are not in older photos.

In 2016, a Dumping at Sea licence ([090151b2805dddf2.pdf \(epa.ie\)](#)) was granted to remove 100,000 tonnes of sand which had built up on the eastern side of the turbines. This infers that the sandbank level has been raised, and being a 'headland associated sandbank' is causing sediment (sand) shift off the parallel beaches.

This issue is not adequately addressed in the EIAR submitted by SSE Renewables Sure Partners Ltd. Therefore, we suggest it is both reasonable and prudent for An Bord Pleanála and the relevant state bodies to commission an independent EIAR with third-party oversight to thoroughly understand the baseline condition and demonstrative changes to the Arklow Bank and parallel coastline since 2004 prior to making a decision for further development on this European site.

All evidence suggests that this project needs to be located on a more environmentally sustainable site.

Specifically,

- The proposed Arklow Bank Wind Park 2 site itself and in-combination with other nearshore wind projects intersects with or is in close proximity to Natura 2000 sites (please see reference 1). The Arklow Bank is defined as "a sandbank slightly covered by seawater at all times" and is recognised as an Annex 1 conservation site under the EU Habitats Directive.
- The Nature Restoration Law states that EU countries should, prioritise restoring habitats that are located in Natura 2000 sites. These areas are "essential" for nature

conservation, the law says, and there is an existing EU obligation to ensure that Natura 2000 areas are covered by long-term restoration measures.

- The protection of biodiversity must be at the core of offshore renewable energy and an ecosystem-based approach to Marine Spatial Planning must be undertaken for all Irish waters, as is required under the Directive 2014/89/EU ('Marine Spatial Planning Directive').

Therefore, this site is not an appropriate location for an offshore windfarm of this scale.

Technology has evolved significantly from 2004 when the Arklow Bank location was first selected by Airtricity and GE to build a 7-turbine "demonstrator project". We are now 20 years later, and SSE Renewables are world class leaders in offshore wind energy. SSE Renewables are currently shown as owning or being involved in three offshore wind farms in the UK:

1. Greater Gabbard which is 23 km from the UK shoreline
2. Beatrice, located 23 km off the outer Moray Firth with turbines fixed in sea depths of 56 metres
3. Seagreen located in the North sea some 27 km offshore with turbines fixed in depths of up to 59 metres

A marine geophysical survey for the Mac Lir Offshore Wind Farm, completed in 2023, has validated a site east of the Arklow Bank as being suitable for fixed-bottom turbine foundations. [Home | Mac Lir Offshore Wind Farm](#)

The problem with this scenario, as I see it, is that given the enormous nature of this project, if this were to go ahead, without meaningful public participation as described previously, the negative impacts that will be immediately felt by hundreds of thousands of residents, business owners and tourists during the 5-6 year heavy construction period, will cause unprecedented outrage as access to eleven beaches will most probably be severely compromised both in the short-term (construction noise pollution given close proximity to shore, reduced clean bathing water quality, open sea horizon obstruction in an area of outstanding natural beauty, industrialised external environment for Wicklow Hospice palliative care patients) and the long-term (adverse change in tidal processes, increased risk of coastal erosion, tourism deterrent, risk to life of complex marine food chain including sea mammals and migrating sea birds, economic loss to inland fisheries and recreational enterprises such as golf links, caravan parks, hotels, restaurants, tour operators, reduction in property value of coastal residences and deteriorated dark sky reserve over the Irish Sea foreshore). These beaches include; Silver Strand, Magheramore, Magherabeg, Jacks Hole, Brittas Bay, Buckronev, Ennereilly, Clogga, Kilmichael, Kilpatrick and Kilgorman Strand.

In conclusion:

The 2020 Guidance document on wind energy developments and EU nature legislation indicates that the "best way to minimise negative effects on EU-protected habitats and species is to locate projects away from vulnerable habitats and species, (a practice known as 'macro-siting'). This project has potential negative impacts on other countries, including Wales and England, for marine mammals and avian species.

Admiralty charts show sea depths ranging from 37 metres to 58 metres over most of the seas east of the Arklow Bank with seabed reaching a depth of 65 metres as it comes very close to the midpoint dividing line between UK and Irish waters. There is no rational and scientific reason to develop a supersized wind farm on a conservation site, surrounded by areas of special protection, only 6 km from eleven sandy beaches.

A project of this size is too big to be commissioned so close to the shore. Within the Foreshore, from shore out 12 nautical miles or 22 km, there are diverse ecosystems centred around the estuaries, sandbanks and reefs. This is where the spawning grounds and nurseries live. Alongside the crab and shell species, they are the breeding grounds for herring, sand eel and mackerel. These fish feed numerous other fish species such as cod, bass, pollock, which in turn feed porpoise, dolphin and seals, right the way up to the fin and humpback whales that roam these waters. Wind farms placed within this 22 km stretch will devastate these ecosystems and the many people and communities that rely on the foreshore for their living.

The foreshore is a finite and valuable natural resource and public amenity. It is imperative and in the overriding interest of the Irish people and future generations that this proposed site is abandoned on the basis that a **publicly available independent assessment of alternative sites east** of the Arklow bank is undertaken as a matter of urgency to determine the existence of far less damaging solutions, in full compliance with EU environmental laws.

It would be nothing short of a travesty if the Commission was to knowingly risk irreparable damage to the heart of what represents our sense of place and defines our identity - the rich ecology and seascapes of the Irish natural environment within the garden county of Ireland.

This is an ill-conceived proposal which carries huge environmental risks and should be refused.

Kind regards,

Olivia







The above photos, taken by me, are from 2017, 2020 and 2025; demonstrating accreted erosion at Brittias Bay south.

