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

From Mary O'Driscoll <info@maryodriscoll.com>

Date Fri 7/24/2026 5:34 PM

To marine@pleanala.ie <marine@xn--pleanla-lwa.ie>; Marine <marine@pleanala.ie>

Cc cianmooney@gmail.com <cianmooney@gmail.com>; tig.mooney@waishz.com
<tig.mooney@waishz.com>

 1 attachment (301 KB)

ABWP2 Submission from Cian and Tighearnan Mooney.pdf;

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Good afternoon,

My neighbours and friends, Cian and Tighearnan Mooney, (both copied in on this email) have asked me to submit the attached on their behalf.

We look forward to receiving confirmation of delivery. If you have any queries, please do not hesitate to contact us.

With best wishes

Mary

Observation to Additional Information provided by SSE to ACP

Name: Cian and Tighearnan Mooney

Address: 15 Oakdale Crescent

Firhouse

Ballycullen Road,

Dublin 24 D24 Y9P5

Offices of An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

24th July, 2026

Email: cianmooney@gmail.com and

tig.mooney@waishz.com

OBSERVATION ON ADDITIONAL INFORMATION

Arklow Bank Wind Park Phase 2

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Dear Sir/Madam,

I am writing to you on behalf of my brother (Tighearnan Mooney) and myself. Both Tighearnan and I have been holidaying in Brittas Bay since 1969 therefore have a long connection to Brittas Bay and the Wicklow coast.

We previously made an observation on this application because we are concerned that a very large industrial development is proposed on a shallow and dynamic offshore sandbank close to beaches, dunes, protected habitats and coastal communities.

We support renewable energy and accept that Ireland needs offshore wind. Our objection is not to offshore wind in principle. Our concern is that this particular project is in the wrong location. In our view, the additional information submitted by Sure Partners has not given the public a clear and reliable assurance that the project will not damage Arklow Bank, the adjoining coastline, wildlife, bathing water, tourism or the natural character of the area.

Neither of us are either a scientist or a lawyer. We are therefore asking the Commission to examine the application from the practical point of view of people who holiday in Brittas Bay and depend on the coast to remain healthy and who expect the developer to prove that serious or irreversible harm will not occur before permission is granted.

The central problem is that SSE's conclusions depend heavily upon numerical modelling of an exceptionally dynamic sandbank. A model is only a simplified representation of the natural environment. It cannot reproduce every storm, sediment movement, wave direction, interaction or long-term change that may occur over the lifetime of the project. Where the effect predicted by the model is very small, but the uncertainty within the model may be greater than that predicted effect, the model cannot reliably support a conclusion of "no appreciable effect".

The fundamental questions for ACP are therefore:

What is the probability that SSE's central conclusion is wrong, what would the environmental consequences be if it is wrong, and who would bear the resulting cost?

The consequences would not be borne principally by SSE. They could be borne by local communities, future generations, the State and the natural environment through increased erosion, altered sediment movement, damage to beaches and dunes, deterioration in water quality, disturbance of protected species and the loss of important coastal amenities.

SSE has also not, in our view, demonstrated 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 presently contained within marine sediments. Statements that disturbed material will disperse rapidly do not, by themselves, prove that the material will cause no harm.

Arklow Bank is a sandbank habitat of a type recognised under **Annex I of the Habitats Directive as habitat type 1110, "Sandbanks which are slightly covered by sea water all the time."** This does not mean that Arklow Bank itself is presently designated as an SAC for that habitat, but it demonstrates that submerged sandbanks are habitats of recognised European conservation importance. The wider Wicklow and Wexford coastline also contains SACs, SPAs, important bird and marine mammal populations, valuable beaches and areas of exceptional natural beauty.

EU law requires permission affecting protected European sites to be based upon complete, precise and definitive findings capable of removing reasonable scientific doubt. Where uncertainty remains, the precautionary principle requires protection rather than optimism or reliance on future monitoring.

Brittas Bay depends on tourism and is a public amenity: Brittas Bay and the wider coastline support recreation, accommodation, hospitality, local employment and wellbeing. The natural seascape is part of the visitor experience and should not be treated as a secondary issue.

We want our children and future generations to be able to enjoy the Blue Flag beach including pristine waters that Brittas Bay enjoys. 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,

Cian and Tighearnan Mooney