



# Arklow Local Area Plan Submission - Report

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South East Coastal Protection Alliance DAC



2<sup>nd</sup> April 2024

To - Arklow and Environs LAP”, Administrative Officer, Planning Department, Wicklow County Council, County Buildings, Station Road, Wicklow Town, A67 FW96

## **“Preparation of the Arklow and Environs Local Area Plan Consultations- Wicklow County Council Consultation**

### **Submission by SECPA**

South East Coastal Protection Alliance DAC (‘SECPA’) is a voluntary group composed of local residents and concerned individuals who are worried about the possible devastating impact that developing a wind farm on the Arklow Bank will have on the coastal environment.

We note that the Local Area Plan has a key role in climate action by including measures to adapt to climate change and transitioning to a low carbon and climate resilient town and local planning.

We note suggested topics are set out in the website and we wish to address the following points: -

- “How can the Plan address flood risk and build resilience to better cope with the increasing frequency of extreme weather events?”
- What are essential elements that can support economic and tourism development.
- What can be done to increase the number of jobs within the settlement?
- Do you have any issues / comments on the SEA/ AA / SFRA that will be done with the draft LAP?
- Environmental Assessment - As part of the LAP preparation process the Council is required to carry out a Strategic Environmental Assessment (SEA), Appropriate Assessment Screening (AA) and Strategic Flood Risk Assessment (SFRA). The purposes of these assessments are to ensure that the environmental consequences of the objectives of the plan are assessed during the plan process.

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➤ **“How can the Plan address flood risk and build resilience to better cope with the increasing frequency of extreme weather events?”**

We note that the Arlow environs include the Brittas Bay Beach and that the WCC Climate Action Plan recognises, inter alia that: -

- *County Wicklow has a coastline which is subject to coastal erosion which impacts upon coastal habitats and the coastal railway.*
- *Based on current trends, County Wicklow will see an increase in sea level rise, similar to what has been experienced to date. County Wicklow is extremely vulnerable to sea level rise, due to its expansive coastline and the large number of the population that has settled on the coast;*
- *Coastal erosion results in damage to coastal habitats, such as at the Murrough and at Brittas Bay.*

SECPA are particularly concerned about the erosion that has taken place on Brittas Bay beach and in particular at its south end. We accept that, like all coastal regions, climate change is having its effect, but it seems to us that the disproportionately severe effect on the most southerly part of the beach. Illustrated by the photograph below taken from your own Draft Climate Action Report.



The reasons for this very severe erosion are unclear but we believe that this may be due to the existence over the past 20 years of 7 wind turbines on the sandbank c 6-13 km from the shore.

There appears to be a complete absence of any independent scientific research or published papers that been carried out to establish the impact that these 7 structures have had on the

Sandbank and as a consequence, on the proximate beaches such as the Brittas bay beach and the Murrough.

It is well known that any deflection of tidal current by the construction of piers and jetties into the sea can have unexpected consequences on the surrounding area. The most well know example of this phenomenon is the formation of Bull Island which followed the construction of the North and South Bull Walls at Dublin.

**Local examples would include disturbance to the coast line at Arklow that followed the construction of the Industrial Pier at Clogga, and the Rock Armor protection works at Wicklow.**

The erection of the 7 turbines and the installation of rock armour protection has already had an impact the Sand bank. This is evidenced by the build-up of sand at the turbine bases which interfered with access of the support vessels to service the turbines. This has directly led to a Dumping at sea Consent (S007-01) being granted to Arklow Energy Ltd on 1st March 2017 to move 100,00t of sand.

It is not well known that shortly after the turbines were installed, it was necessary to carry out unforeseen works to the base of the turbines, and rock armour had to installed to stabilise the turbine structures. This was necessary due to scouring effect of the strong tidal force.

We note that the EPA granted the Dumping at Sea licence without a proper Environmental Impact Assessment being carried out. A document entitled "Dumping at Sea Permit Application Supporting Information" was provided. This document is not a substitute for a proper EIA and was not carried out by an independent expert.

The granting of a dumping at sea licence and the scouring effect underlines that the base of the turbines causes unforeseen movement of sand.

The relationship between the sand bank/ beach/sand dunes is poorly understood. They are all part of the same symbiotic system from the same source of sand. The sandbank is a live dynamic system which changes as the tide flows up and down the coast.

For the past 20 years, this wind farm project has compromised the natural movement of this sandbank. We are seeing the south end of Brittas Bay beach wash away every year. The sand is being replaced with stones. The lifeguard hut now sits on stilts. Whilst the north end of the beach remains unchanged.

We are concerned that the current plans led by the Government, to permit installation of up to 60 new turbines (330m high) with 200km of associated interconnecting cables (installed in trenches 15m wide) will have far reaching consequences and cause potentially devastating damage to the sandbank, from which it will not recover. If the sand bank is damaged, then surely the beaches will be severely damaged as the protection offered by the sand bank could be lost.

The developer has already admitted that installation of turbines on sand banks may have an impact on the coast however they appear to have scoped out any impact on the coastal process outside of the sandbank footprint in the scoping EIA.

The Arklow sandbank measures 27 km by 2.5 km and sits approximately 6 km to 15 km to the east of Arklow in County Wicklow. At spring low tides, the top of the sand bank can be exposed but it then quickly falls off to a depth of up to 30m at the seabed. It provides protection to the beaches of Wicklow from storms.

The sand bank is the main protection that the beaches in Co Wicklow have from storms. If this protection is undermined, then this could potentially wipe out the sand dune features at Brittas Bay which are within the jurisdiction of Wicklow Co Co.

We are concerned that no independent research has been carried out to ascertain the impact that the new development will have on the sandbank and on the proximate coastline. This we believe is a serious error and a flaw in the proper governance of the project.

**We call on Wicklow Co.Co. to provide, in its Arklow and Environs Local Area Plan, that Scientific research must be carried out by an independent body and the findings considered before any decisions are made to proceed with this industrial exploitation of the sand bank by the Government.**

### Alternative Sites

- There is no need for the sandbank to be a location of a Windfarm.
- **We believe that wind farms should be located at a minimum distance of 22km from the shoreline and not on sandbanks. Following the European norms for new offshore wind farm development.**
- The Government has failed to examine alternative sites for Phase 1 (relevant) projects as required by European Law.
- Other sites are available and have not been considered. Wind Farms do not have to be located on sandbanks and so close to shore. There are plenty of other suitable locations further out to sea. Ireland sea area is 10 times is land mass and there is plenty of scope for good project planning at locations where the biodiversity threat will not be an issue.
- The distance out from shore does not pose a problem in connecting into the grid, e.g., Dogger Bank wind farm is located 130km out to sea.
- Fixed bottom turbines can now be installed with depths of water of 60-80m

The Habitats Directive lays a big emphasis on the requirement for necessary research and scientific work to be carried out so that the competent authority so that they can ascertain that a development will not adversely affect the integrity of a conservation site. Ie the sandbank and SAC's.

Sandbanks are already a conservation site (Annex 1 habitat) and we believe that this development involve breaches of both Irish and European Law and will impact upon Natura 2000 sites.

Consideration of any wind energy development on sandbanks must be subject to Ireland's obligations under the Habitats Directive (92/43/EEC), the EU (Birds) Directive (79/409/EEC) and the Environmental Impact Assessment Directive (85/337/EEC). It also should consider the objectives of the County's SACs and SPAs (Natura 2000 sites).

The current biodiversity emergency will be accelerated by badly sited turbines and while there are plans to allow many windfarms to be developed around our coastline, the existing development off Arklow provides a unique opportunity for an evidence-based assessment of any collateral damage to the general ecosystem and the nearby beaches.

To date, government has actively promoted developer-led planning at sea. Only now are the public being made aware of the serious consequences of this. Planning for wind is a shambles with cases already in court & vital habitat & species conservation is threatened.

**We call on Wicklow Co. Co. that the Local Area Action plan promotes that any proposed development is only allowed to proceed if it satisfies the European directives.**

We note that recommendations incorporated into the plan include at Ref 8 NEGI refer to the Brittas Bay Conservation Plan.

*"Incorporate Nature Based Measures for coastal erosion in order to support the conservation and management of Sand Dunes at Brittas Bay, having due regard to environmental sensitivities associated with coastal areas such as the receiving marine environment, biodiversity, European sites, recreation and amenity value etc."*

We believe that this recommendation does not go far enough to protect the beaches and sand dunes of Co. Wicklow as it focuses mainly on pedestrian damage to the sand banks. This recommendation should also acknowledge the unintended acceleration of erosion that will take place if the protection of the sand banks is lost.

- **What are essential elements that can support economic and tourism development.**
- **What can be done to increase the number of jobs within the settlement?**

While wind farms close to the shore can bring various economic benefits, such as job creation and energy production, they can also have negative economic impacts:

**Impact on Tourism:** Wind farms close to the shore may deter tourists who visit coastal areas for their natural beauty. The presence of large turbines can alter the aesthetic appeal of the coastline, potentially reducing tourism revenue for businesses such as hotels, restaurants, and recreational facilities.

**Impact on Local Businesses:** Some local businesses, particularly those reliant on unobstructed sea views or access to the shore, may experience reduced foot traffic and patronage due to the presence of wind farms. This can lead to revenue losses and, in some cases, business closures.

**Job Displacement:** While wind farms create jobs during construction and operation, they may also lead to job displacement in industries adversely affected by their presence, such as fishing or tourism. Workers in these industries may face challenges finding alternative employment opportunities or may need to retrain for new careers.

The current developers, SSE Renewables have claimed that 2,300 jobs will be created over the lifetime of the Wind Park, however, no details have been provided on request from SECPA. We would be sceptical that this is a correct forecast of job creation.

If the Wind Park was located further than 22km out to sea as demanded by SECPA, there would be no impact on the proposed jobs for Arklow.

➤ **Do you have any issues / comments on the SEA/ AA / SFRA that will be done with the draft LAP?**

The SEA/ AA / SFRA required to be created should recommend that any Wind Park in the vicinity of the Arklow environs should be located on sites that are plan led and not on developer led sites that were chosen on the basis of profits for the developer (cheap to install) and based on outdated technology (turbines can now be installed in depths of water up to 70m.) The present MAC that applies to the SSE Development should be rescinded and a planned location be chosen instead, one which complies with European best practice and regulations.

➤ **Environmental Assessment - As part of the LAP preparation process the Council is required to carry out a Strategic Environmental Assessment (SEA), Appropriate Assessment Screening (AA) and Strategic Flood Risk Assessment (SFRA). The purposes of these assessments are to ensure that the environmental consequences of the objectives of the plan are assessed during the plan process.**

Wicklow Co Co. are encouraged to take the consequences of installing 57 turbines on a sandbank which is a recognised conservation site and a European habitat (Annex 1) into account in developing an Environmental Assessment.

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**Please be assured that SECPA are not against Wind Farms, but just not to be placed on conservation sites on the east coast of Ireland. We support Wind Farms being developed further out to sea. That is our sole objective.**

The primary objectives of our organisation are to ensure protection of all ecosystems along the shorelines including all sand dunes, fens and SAC/SPA areas, to ensure protection of offshore habitats including sandbanks, natural flora and fauna and marine habitats.

SECPA believes that, based on international comparisons and best environmental practice, the proposed development is too big and too close to shore. Alternative sites are available and could be completed within the same timeframe without objection. Ireland should seek to protect our near-shore biodiversity, habitats (e.g., east coast sandbanks, Annex 1 listed Habitats), seascapes, fishing, and the marine environment and to reduce the risk of further erosion of Ireland’s east coast, by siting such major industrial developments further from shore.

Yours Faithfully

*Michael Higgins*

*William Hourie*

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Michael Higgins

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William Hourie

**South East Coastal Protection Alliance (DAC)**

[www.secpa.ie](http://www.secpa.ie)

## Attachments

1. SUMMARY OF REASONS NOT TO ALLOW INDUSTRIAL DEVELOPMENT ON THE ARKLOW SANDBANK.
2. DUMPING AT SEA LICENCE – PERMIT DETAILS



## **ATTACHMENT 1.**

### **SUMMARY OF REASONS NOT TO ALLOW INDUSTRIAL DEVELOPMENT ON THE ARKLOW SANDBANK.**

SECPA believes that the Project planned for the Arklow Sand Bank should be halted and the project moved elsewhere at least 22km off-shore.

The reasons are: -

- Sandbanks are a nature conservation site under Habitats Directive and as such should not be turned into an industrial complex.
- The Irish Sea on the East Coast of Ireland is one of the best habitats in the world for phytoplankton. Phytoplankton plays a crucial role in sandbanks as a carbon sink and contributes to the carbon cycle and is vital to the sandbank ecosystems: It is the main building block for marine life.
- A significant threat to biodiversity and likely irreparable damage to the sand bank exists.
- Sandbanks are a rare geological formation and are slightly covered at all times by seawater.
- There is a significant threat to biodiversity on the proximate shore line. In particular the adjacent SAC's
- Sandbanks act as a buffer to coastal erosion due to their wave moderation properties.
- Sandbanks are an essential feeding and foraging area for birds.
- Sandbanks are a vital breeding and feeding area for fish.
- Severe erosion on the south end of Brittas Bay beach has already taken place. This has been particularly noticeable since the construction of the seven existing turbines in 2004.
- We do not want a repeat of what happened at the Murrough beach which has been completely denuded of sand - nothing was done to stop this.
- Special Areas of Conservation on the coast have not been given adequate attention and as a consequence are under threat.
- Developers are primarily driven by profits and biodiversity has a secondary priority.
- There is no overall national plan that allows for these projects to be developed on conservation sites. The 7 relevant projects (4 of which have been granted grid connection) were not the subject of a national plan as prescribed by European Law i.e. Strategic Environmental Assessment (SEA)
- The location of these projects was chosen by developers and not under a Government Plan that respects and protects the environment.

- The Government has subsequently pushed the construction of these projects, in spite of the fact that they are not covered by an SEA.
- The Wind Farms developments are in default of the Habitats directive as they have not taken account of the combined effect of the other projects that are beside each other.
- The sandbanks should have been designated as a Marine Protected Area (MPA). However, this did not occur because of the presence of a proposed commercial development. This is a non-scientific reason for exclusion and is in breach of Habitats Directive Requirement
- Breaches of EU Law can be costly, e.g., ESB Derrybrien windfarm led to €17million in fines for the Irish State and had eventually been dismantled because of breaches of EU Law.
- These near shore projects should be stopped, and instead the emphasis should be moved further offshore to protect vital coastal habitats & species.
- The Government's current determination to develop vast near-shore wind is in direct conflict with good practice (as proposed in OREDP 2) and the European norm. Right now, site investigations, sanctioned by government, are ongoing.
- Marine ecosystems may be less visible but are crucial for life.
- This is just a continuation of Irelands disregard for biodiversity and will surely be challenged at European level.

### **Ireland's Record for Protecting Biodiversity**

- Ireland already has a very bad record in protecting habitat and supporting biodiversity. A recent article in the IT (29-06-23) states that

*"The European Court of Justice's finding that Ireland has failed to adequately implement the EU habitats directive over many years is an indication of a gross failure of policy and implementation."*

*Inaction and poor management of internationally important sites has imperilled Ireland's most prized natural possessions".*


- This is on foot of previous European Commission's ruling (2021) that Ireland was *"persistently failing to manage protected nature sites"*.
- The Governments approach to forcing through wind farms development on sand banks (Conservation sites- Annex 1 Habitats) is another example of bad management and bad planning.
- Protection of fish species, birds, seals and dolphins and prevention of further coastal erosion should be the most important aspect of future planning.

## ATTACHMENT 2.

### DUMPING AT SEA LICENCE – PERMIT DETAILS

#### Permit Details

#### Details of Application

<b>EPA Reg No.</b>	S0027-01  <a href="#">About Permit RSS Feeds</a>
<b>DAFF Ref:</b>	N/A
<b>Applicant:</b>	Arklow Energy Limited Wicklow.
<b>Location of Loading:</b>	n/a
<b>Location of Disposal Site:</b>	Seabed levelling by plough dredging will take place in an area to the east of the turbines of the Arklow Bank Wind Park that is approximately 700m in length and 100m in width.
<b>Description of Activity:</b>	The accretion of sand around the bases of the Arklow Bank Wind Park is restricting access for maintenance vessels. Seabed levelling undertaken by plough dredging is therefore proposed in an area of the east of the turbines to redistribute this sediment.
<b>Application Date:</b>	24/11/2016
<b>Permit Status:</b>	Granted
<b>Permit Expiry Date:</b>	N/A

#### Decision Details

<b>Proposed Decision issued date:</b>	N/A
<b>Closing date for objections to Proposed Decision:</b>	N/A
<b>Final Decision issued date:</b>	20/10/2017

#### Documents

To view electronic documents (if any) for this application, click on the buttons below. These open in a new window. All documents available in electronic format are presented as Adobe Acrobat PDF files. If you have any problems opening or displaying a document in your browser, right-click on the file and save it to your computer.

##### Licence application documents:

<a href="#">View applicant documents</a>	<a href="#">View EPA documents</a>
<a href="#">View Third Party documents</a>	<a href="#">View Miscellaneous documents</a>

[More information on the licence application process](#)

##### Licence enforcement documents:

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