1.1 CWPL response to Public Submission 1

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application. In order to cover all your concerns, we will answer each in turn.

The development proposed for this site is excessive in scale. The original applications for this site proposed 220 and an additional 200 turbines with a rotor diameter of up to 120 m and a tip height of up to 160 m above Mean Sea Level (applications in 2005 license and 2009 extension respectively). At an expected output of 2.1GW this wind array will be the largest in the world.

The current largest offshore windfarm is the Hornsea (1.2GW) array located off the Yorkshire coast, which is up to 120km from shore. In comparison, the proposed CWPOWF site development is only 13km from the high amenity of the Bray Head/Wicklow coastline. This location fails to meet international practice for locating large scale offshore wind projects. Concerns regarding environmental impacts of near shore developments on marine biodiversity, habitats, coastal landscapes and seascapes had the effect in 2019 that the average distance of offshore wind farms under construction was typically 60km to shore within the EU.

The current application is predicated on the understanding that CWPOWF is considered to have a Relevant Project status under the MPDM Bill Transitional arrangements. The previous application (by Treasury Holdings & Fred Olsen Renewables) for a 1GW offshore wind farm development at this site was granted a Foreshore Lease in 2005 (CWP).

CWPL acknowledge your concerns relating to the size and scale of the proposed wind farm however, as explained in Section 1 of the Supplementary Information document CWPL are undertaking a re-design exercise to refine the project taking into account latest offshore wind technology. This re-design exercise is expected to result in a lower number of larger turbines and an expected capacity of between 900 – 1500MW. The project design is still being refined and will be consulted upon alongside a thorough assessment of the final design. The re-designed scheme is anticipated to have fewer than 100 turbines in total (compared with the original design of over 400). In addition, it is not expected that CWP will become the world's largest windfarm. Currently the Dogger Bank wind farm, a 50:50 joint venture (JV) between SSE Renewables and Equinor, is developing a 3600MW project, which is set to be the world's biggest offshore wind farm, with commissioning expected in 2023.

According to the Climate Action Plan, Ireland aims to be carbon neutral by 2050 and to double the amount of electricity it produces from renewable energy from 35% to 70% by 2030. This includes 5GW from offshore wind power. Regardless of this policy, our project will only achieve consent if An Bord Pleanála are satisfied that it meets all planning and environmental regulations.

The potential impacts of the construction and operational phases of the CWP wind farm will be assessed in a comprehensive EIAR for both the offshore and onshore elements of the project. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer. This engagement will ensure that stakeholders and the community have the opportunity to provide feedback, discuss any concerns and keep up to date with the project progress. These events will be advertised widely in the local area when planned. All feedback from stakeholders will be considered by Codling Wind Park.

As part of the development of the Environmental Impact Assessment Report (EIAR) a broad range of onshore and offshore surveys will be carried out. These include surveys to assess:

- Sediments and coastal processes
- Water quality

- Benthic ecology
- Fish and shellfish
- Birds
- Marine mammals
- Underwater noise and EMF
- Marine archaeology
- Landscape and visual impact
- Airborne noise

However as this is an application only to undertake studies as opposed to an application for a wind farm an Environmental Impact Assessment is not required for a foreshore licence for site investigation surveys, but, should the area be deemed feasible and a planning application is prepared, an EIA will certainly form part of that application.

The current application sets out key relevant legislation and policies, including:

- ***The Foreshore Act 1933 and the Foreshore Regulation 2011 (S.I. No. 353/2011);***
- ***The OREDP and OREDP Interim Review 2018;***
- ***MPDM 2019 General Scheme***
- ***Draft NMPF***

CWP state that "For the avoidance of doubt, this application is being made under the existing Foreshore Act (1933) to the DHPLG". It is regrettable that this application given its scale, is being considered before both the first Irish Marine Spatial Plan and new legislation to replace the Foreshore Act 1933 have been finalised. An application such as this requires the most careful assessment. The effect of granting this application will be to facilitate development of an industrial scale wind farm array development covering hundreds of square kilometres of near-shore waters to progress without it being subject to the appropriate environmental assessments.

For the avoidance of doubt, this licence application to conduct surveys is being made under the existing Foreshore Act (1933) to the DHPLG. This is the current legislation in place, and it is a legal requirement for CWP to comply with the current legislation (Foreshore Act (1933)) in obtaining a Foreshore licence.

However, the new consent application and associated Environmental Impact Statement (EIS) will be progressed under the Transitional Arrangements and it is anticipated that CWP will be among the first projects to be submitted to the new MPDM regime once it has been enacted. In May 2020 CWP was confirmed as having Relevant Project status under the Transitional Protocol published as part of the General Scheme and FAQs for the Marine Planning and Development Bill (2019). Relevant Project status places CWP in the Planning Interest phase of the MPDM and allows CWP to continue with its environmental surveys, assessments and scoping work in advance of MPDM enactment, expected in Q1/2 2021.

The in-combination effects of other wind farm arrays in this location have not been considered in this application within the Environmental Impact Assessment. No recognition that the southern end of the site on which the Dublin Array development is proposed, on the Kish and Bray banks, is within half a kilometre from the northern point of the site of CWPOWF development, off Bray Head. The application area is approximately 17.5km north of the constructed Arklow Bank Wind and two other fast-tracked proposals are located in the inshore area between North Dublin and Louth. One thing that each of these developments have in common, is that the sites were selected by developers in near-shore shallow waters, largely on vulnerable sandbank habitat, because this location is the cheapest options for development.

As noted in the opening paragraph, the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the EIA that will be required, as opposed to an application to construct and operate an offshore windfarm. As such the windfarm project and layout will be the subject of further consultation in the future as part of the EIA process. The EIA process will include cumulative impact assessment (CIA).

Regarding the EIAR for the proposed windfarm, it should be noted that the EIAR has not yet been completed. Whilst the EIA Regulations 2018 and 2017 guidance states that only projects that are existing or have already received consent need to be considered in the (CIA), at this stage other offshore wind farms which have been confirmed as a 'Relevant Project' are also under consideration where they may result in cumulative effects. This list will likely need to be updated and further agreed to ensure that the CIA takes account of all relevant plans and projects. This will be done through periodic review of the list and through consultation with the regulators and consultees during the pre-application process, and further advice and guidance is requested from DHPLG.

Locating massive wind farm array infrastructure along the Irish east coast, in particular along the Dublin, Louth, Wicklow coastline fails the simplest test in mitigating substantial impacts. Irish territorial waters extend to only 12nm (nautical miles) which means that it is not possible to locate wind arrays out to sea at 60km or more. The CWPOWF license for further survey should be rejected, and a more appropriate windier site that meets international norms and the MPDM General Scheme, NMPF legislation requirements identified.

Location of a wind array within Irish waters this distance from shore seems to be out of step with other locations within the EU and should be reappraised within the parameters of new legislation so that a more wholistic view of the proposal could be determined.

The planned use of larger wind turbines for Codling Wind Park will result in less turbines being required, reducing the turbine numbers and overall visual impact of the project.

A Seascape, Landscape and Visual Impact Assessment (SLVIA) will be prepared by Chartered Landscape Architects in accordance with best practice and current guidance. The SLVIA will identify and assess the potential impacts during the construction, operational and decommissioning stages that the proposed CWP project may have on the seascape, landscape and visual resources within the study area.

The wind farm is at an early stage of design with environmental baseline data being gathered and assessed which will help inform the final layout, which it is proposed will be finalised post consent. Factors that will feed into the final layout include further environmental considerations such as avoidance of any wrecks, seabed conditions, engineering consideration such as final foundation type and specific wind turbine manufacturer's requirements.

Following completion of the main baseline landscape and visual assessment, design objectives will be developed considering other key parameters and constraints. These layouts will be examined from key design viewpoints to assess and optimise the number, size and layout of the proposed WTGs in relation to the seascape and landscape to the west as well as adjacent wind farm development. The design iteration process will take account of other environmental and technical factors to establish the final layout for the proposed wind farm. The design optimisation process will be reported and illustrated in the EIAR.

Codling Wind Park Ltd value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

Regarding the FILA application we would be more than happy to arrange a call with yourself or have a discussion with you over the coming weeks.

1.2 CWPL response to Coastal Concern Alliance (Submission 2)

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

In 1999, Fred Olsen Renewables carried out a search around the Irish coast to identify potential offshore wind development sites, in consultation with the Department of Communications, Marine and Natural Resources (now the Department of Communications, Climate Action and Environment). After careful consideration of the technical, physical and environmental criteria, the area around Codling Bank was identified as having several advantages when compared to other potential sites. The Foreshore Act is applicable only to cover development out to the Irish Territorial Limit (TL) so developing projects further offshore outside Irish Territorial Waters (TW) will not be possible until the MPDM has been enacted.

CWPL acknowledge your concerns relating to the size and scale of the proposed wind farm however, as explained in Section 1 of the Supplementary Information document CWPL are undertaking a re-design exercise to refine the project taking into account latest offshore wind technology. This re-design is expected to result in a lower number of larger turbines and an expected capacity of between 900 – 1500MW, the project design is still being refined and will be consulted upon alongside a thorough assessment of the final design. The re-designed scheme is anticipated to have fewer than 100 turbines in total (compared with the original design of over 400). In addition, it is not expected that CWP will become the world's largest windfarm. Currently the Dogger Bank wind farm, a 50:50 joint venture (JV) between SSE Renewables and Equinor, is developing a 3600MW project, which is set to be the world's biggest offshore wind farm, with commissioning expected in 2023.

According to the Climate Action Plan, Ireland aims to be carbon neutral by 2050 and to double the amount of electricity it produces from renewable energy from 35% to 70% by 2030. This includes 5GW from offshore wind power. Regardless of this policy, our project will only achieve consent if An Bord Pleanála are satisfied that it meets all planning and environmental regulations.

The potential impacts of the construction and operational phases of the CWP wind farm will be assessed in a comprehensive EIAR for both the offshore and onshore elements of the project. A detailed landscape and visual impact assessment will be carried out as part of the EIAR. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer. This engagement will ensure that stakeholders and the community can provide feedback, discuss any concerns and keep up to date with the project progress. These events will be advertised widely in the local area when planned. All feedback from stakeholders will be considered by Codling Wind Park.

As part of the development of the Environmental Impact Assessment Report (EIAR) a broad range of onshore and offshore surveys will be carried out. These include surveys to assess:

- Sediments and coastal processes
- Water quality
- Benthic ecology
- Fish and shellfish
- Birds
- Marine mammals
- Underwater noise and EMF
- Marine archaeology

- Landscape and visual impact
- Airborne noise

However as this is an application only to undertake studies as opposed to an application for a wind farm an Environmental Impact Assessment is not required for a foreshore licence for site investigation surveys, but, should the area be deemed feasible and a planning application is prepared, an EIA will certainly form part of that application.

In relation to the visual impacts of wind farm, while offshore wind turbines can be larger than onshore wind turbines, their visibility is usually lower. This is because offshore wind turbines are usually located several kilometres from the shoreline. At 7-10 km the turbines will appear to be about the height of a thumb held at arm's length above the horizon.

The planned use of larger wind turbines for Codling Wind Park will result in less turbines being required, reducing the turbine numbers and overall visual impact of the project.

A Seascape, Landscape and Visual Impact Assessment (SLVIA) will be prepared by Chartered Landscape Architects in accordance with best practice and current guidance. The SLVIA will identify and assess the potential impacts during the construction, operational and decommissioning stages that the proposed CWP project may have on the seascape, landscape and visual resources within the study area. It is envisaged that seascape, landscape and visual considerations will be one of the many inputs to the design development process. Analysis of the seascape and landscape will be undertaken to identify key seascape, landscape and visual characteristics and sensitivities.

The wind farm is at an early stage of design with environmental baseline data being gathered and assessed which will help inform the final layout, which it is proposed will be finalised post consent.

Following completion of the main baseline landscape and visual assessment, design objectives will be developed considering other key parameters and constraints. These layouts will be examined from key design viewpoints to assess and optimise the number, size and layout of the proposed WTGs in relation to the seascape and landscape to the west as well as adjacent wind farm development. The design iteration process will take account of other environmental and technical factors to establish the final layout for the proposed wind farm. The design optimisation process will be reported and illustrated in the EIAR.

CWP has been in development for some time. During the development phase the project has been compliant with relevant regulations and legislation. Prior to the enactment of the MPDM, the Foreshore Acts 1933 - 2014 (the Foreshore Act) are the core legal instruments for managing the marine and coastal environment and the statutory basis on which an area of the seabed could be leased to a developer of an offshore wind farm. The Foreshore Act granted the appropriate Minister at the Department of Housing, Planning and Local Government (DHPLG) the authority to lease or licence foreshore land belonging to the Irish State where it would be in the public interest to do so.

As you are aware the MPDM Bill updates this Foreshore Act 1933 and addresses the absence of a regulatory framework to regulate offshore renewable energy developments beyond the limits of the foreshore (12 nautical miles). The aim of the Bill is to streamline the consenting process and the Bill is underpinned by a statutory Marine Planning Policy Statement (MPPS) and guided by the National Marine Planning Framework (NMPF).

The new consent application and associated Environmental Impact Statement (EIS) will be progressed under the Transitional Arrangements and it is anticipated that CWP will be among some of the first projects to be submitted to the new MPDM regime once it has been enacted. The transitional arrangements will give guidance to the sector regarding the treatment of certain offshore wind projects (Relevant Projects) in the context of the MPDM.

On a side note and as you are aware, Ireland has declared a climate emergency and needs offshore wind to help meet its challenging renewable energy targets in the fight against climate change. The government published a Climate Action Plan in June 2019 and with it a target of producing 3.5GW of offshore wind power by 2030. As highlighted above, Ireland aims to be carbon neutral by 2050 and to double the amount of electricity it produces from renewable energy from 35% to 70% by 2030. This includes 5GW from offshore wind power. Regardless of this policy, our project will only achieve consent if An Bord Pleanála are satisfied that it meets all planning and environmental regulations.

Ireland has currently a high reliance on the import of energy, mainly gas and electricity. CWP will help reduce Ireland's reliance on imported fossil fuels-based energy and increase Ireland's indigenous

energy supply. Ireland has a real opportunity when it comes to offshore wind power. Good wind speeds and favourable foreshore conditions provide an ideal environment for generating green electricity offshore. Offshore wind costs have fallen by over fifty per cent in recent years making it viable to produce and supply renewable offshore energy at a competitive price.

Codling Wind Park will deliver many benefits, including:

Environmental

- Clean electricity to supply hundreds of thousands of homes in Ireland
- Removing at least one million tonnes of harmful carbon emissions annually
- Reducing the reliance on imported fossil fuels and providing a secure, low carbon, indigenous electricity supply

Economic

- Offshore wind energy will be a key enabler to unlock new infrastructure investment in Ireland's ports and maritime economy
- Over €1bn investment delivering approximately €250m into the regional and national economy Note: figures to be refined based on final design.
- Hundreds of full-time jobs during construction
- Full-time local jobs for at least a minimum of 25 years
- Operation and maintenance headquarters to be based locally.
- Help create a domestic supply chain that will be vital to Ireland's future offshore renewable energy industry

Social

- A community benefit fund will be established in line with the Offshore Renewable Electricity Support Scheme requirements
- Reduced emissions and a cleaner environment for all.

Codling Wind Park Ltd value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

Regarding the FILA application we would be more than happy to arrange a call with yourself or have a discussion with you over the coming weeks.

1.3 CWPL response Transport Infrastructure Ireland (Submission 3)

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application. CWPL will ensure these considerations are considered during the onshore aspect of the project development.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

Codling Wind Park Ltd value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

Regarding the FILA application we would be more than happy to arrange a call with yourself or have a discussion with you over the coming weeks.

1.4 CWPL response to Fisher (Submission 4)

Thank you for getting in touch with me to raise your concerns, which I have also shared with the Codling Wind Park team.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

Codling Wind Park (CWP) recognises the importance of fisheries engagement and the need for early engagement with a wide range of stakeholders and other marine users. Codling Wind Park Ltd has contracted Fishery Liaisons Ltd (FLL), to facilitate the efforts to engage with fisheries stakeholders, and has appointed [redacted] & [redacted] as CWP Fisheries Liaison Officer (FLO). [redacted] & [redacted] are currently engaging with the local fishing community as part of the early consultation on the Foreshore Investigation License Application (FILA). Fishing interests will have an opportunity to discuss the survey plans, and their fishing activity with us in advance of surveys being carried out, and in this regard, we welcome any feedback from yourself.

Engagement with the various fisheries organisations will take place during the FILA process, before and during subsequent marine surveys and throughout the project development itself, in order to inform the Environmental Impact Assessment Report (EIAR) and to reduce potential impacts to the fishing industry.

The FILA surveys are necessary to;

- determine the feasibility of the site and cable routes,
- inform the technical and electrical design,
- collect environmental and technical data that will be assessed and submitted in the EIAR as part of the consent application.

CWPL appreciate that there is a need for effective liaison with fisheries organisations. In order to fully understand potential impacts, co-existence opportunities and displacement considerations, and guide appropriate mitigation responses it is important to liaise with the fisheries organisations.

CWP are committed to achieving co-existence; however, it is important to recognise that to achieve this CWP must work closely with the fisheries. Generally, there is no reason why fishing and offshore wind farms cannot co-exist, and fishing continues today in and around many offshore windfarms in many parts of the world. Following construction of the wind farm, no exclusion or safe passage zones are proposed to be implemented above cables or within the development area. During site investigations and construction activities temporary exclusion or safe passage zones surrounding vessels are likely. The best way to ensure fishing can continue around an offshore wind farm is for the developer and local fishers to share information and work together to overcome any obstacles.

There are a variety of mitigation measures that can be applied to facilitate co-existence, and where feasible these will be developed in collaboration with the affected fisheries and relevant stakeholders

The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR for both the offshore and onshore elements of the project. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer.

It is considered that the survey works will not significantly impact on fisheries or other recreational marine users and any potential impacts can be minimised using best practice mitigation measures including the use of a FLO. The proposed surveys will be carried out over a short time frame; the disturbance will be temporary and there will be no significant impacts on marine species. Regarding your concern with the CWP windfarm, the best way to reduce possible effects on commercial fishing is

through close communication and cooperation between CWP and local fishermen in order to share information and work together with you to overcome any obstacles that may exist and to help facilitate fishing to continue in and around the proposed wind farm.

In order to capture your feedback on the FILA we would be more than happy to arrange a call with yourself.

1.5 CWPL response to Fishers (Submission 5)

Thank you for providing comments on the Codling Wind Park Foreshore Investigation Licence Application.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

Codling Wind Park (CWP) recognises the importance of fisheries engagement and the need for early engagement with a wide range of stakeholders and other marine users. Codling Wind Park Ltd has contracted Fishery Liaisons Ltd (FLL), to facilitate the efforts to engage with fisheries stakeholders, and has appointed [redacted] & [redacted] as CWP Fisheries Liaison Officer (FLO). [redacted] & [redacted] are currently engaging with the local fishing community as part of the early consultation on the Foreshore Investigation License Application (FILA). Fishing interests will have an opportunity to discuss the survey plans, and their fishing activity with us in advance of surveys being carried out, and in this regard, we welcome any feedback from yourself.

Engagement with the various fisheries organisations will take place during the FILA process, before and during subsequent marine surveys and throughout the project development itself, in order to inform the Environmental Impact Assessment Report (EIAR) and to reduce potential impacts to the fishing industry.

It would be much appreciated if you have time over the coming weeks for a discussion to capture any specific concerns or feedback that you may have in relation to the CWP FILA. In normal circumstances we would arrange physical meetings with our stakeholders, however with the existing COVID situation we have been arranging online meetings or direct telephone calls to stakeholders as appropriate.

The FILA surveys are necessary to;

- determine the feasibility of the site and cable routes,
- inform the technical and electrical design,
- collect environmental and technical data that will be assessed and submitted in the EIAR as part of the consent application.

CWPL appreciate that there is a need for effective liaison with fisheries organisations. In order to fully understand potential impacts, co-existence opportunities and displacement considerations, and guide appropriate mitigation responses it is important to liaise with the fisheries organisations.

CWP are committed to achieving co-existence; however, it is important to recognise that to achieve this CWP must work closely with the fisheries. Generally, there is no reason why fishing and offshore wind farms cannot co-exist, and fishing continues today in and around many offshore windfarms in many parts of the world. Following construction of the wind farm, no exclusion or safe passage zones are proposed to be implemented above cables or within the development area. During site investigations and construction activities temporary exclusion or safe passage zones surrounding vessels are likely. The best way to ensure fishing can continue around an offshore wind farm is for the developer and local fishers to share information and work together to overcome any obstacles. There are a variety of mitigation measures that can be applied to facilitate co-existence, and where feasible these will be developed in collaboration with the affected fisheries and relevant stakeholders

The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR for both the offshore and onshore elements of the project. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer.

It is considered that the survey works will not significantly impact on fisheries or other recreational marine users and any potential impacts can be minimised using best practice mitigation measures including the use of a FLO. The proposed surveys will be carried out over a short time frame; the disturbance will be temporary and there will be no significant impacts on marine species. Regarding your concern with the CWP windfarm, the best way to reduce possible effects on commercial fishing is through close communication and cooperation between CWP and local fishermen in order to share information and work together with you to overcome any obstacles that may exist and to help facilitate fishing to continue in and around the proposed wind farm.

In order to capture your feedback on the FILA we would be more than happy to arrange a call with yourself.

1.6 CWPL response to Fisher (Submission 6)

Thank you for providing comments on the Codling Wind Park Foreshore Investigation Licence Application.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

Codling Wind Park (CWP) recognises the importance of fisheries engagement and the need for early engagement with a wide range of stakeholders and other marine users. Codling Wind Park Ltd has contracted Fishery Liaisons Ltd (FLL), to facilitate the efforts to engage with fisheries stakeholders, and has appointed [redacted] & [redacted] as CWP Fisheries Liaison Officer (FLO). [redacted] & [redacted] are currently engaging with the local fishing community as part of the early consultation on the Foreshore Investigation License Application (FILA). Fishing interests will have an opportunity to discuss the survey plans, and their fishing activity with us in advance of surveys being carried out, and in this regard, we welcome any feedback from yourself.

Engagement with the various fisheries organisations will take place during the FILA process, before and during subsequent marine surveys and throughout the project development itself, in order to inform the Environmental Impact Assessment Report (EIAR) and to reduce potential impacts to the fishing industry.

It would be much appreciated if you have time over the coming weeks for a discussion to capture any specific concerns or feedback that you may have in relation to the CWP FILA. In normal circumstances we would arrange physical meetings with our stakeholders, however with the existing COVID situation we have been arranging online meetings or direct telephone calls to stakeholders as appropriate.

The FILA surveys are necessary to;

- determine the feasibility of the site and cable routes,
- inform the technical and electrical design,
- collect environmental and technical data that will be assessed and submitted in the EIAR as part of the consent application.

CWPL appreciate that there is a need for effective liaison with fisheries organisations in order to fully understand potential impacts, co-existence opportunities and displacement considerations, and guide appropriate mitigation responses it is important to liaise with the fisheries organisations.

CWP are committed to achieving co-existence; however, it is important to recognise that to achieve this CWP must work closely with the fisheries. Generally, there is no reason why fishing and offshore wind farms cannot co-exist, and fishing continues today in and around many offshore windfarms in many parts of the world. Following construction of the wind farm, no exclusion or safe passage zones are proposed to be implemented above cables or within the development area. During site investigations and construction activities temporary exclusion or safe passage zones surrounding vessels are likely. The best way to ensure fishing can continue around an offshore wind farm is for the developer and local fishers to share information and work together to overcome any obstacles.

There are a variety of mitigation measures that can be applied to facilitate co-existence, and where feasible these will be developed in collaboration with the affected fisheries and relevant stakeholders

The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR for both the offshore and onshore elements of the project. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer.

It is considered that the survey works will not significantly impact on fisheries or other recreational marine users and any potential impacts can be minimised using best practice mitigation measures including the use of a FLO. The proposed surveys will be carried out over a short time frame; the disturbance will be temporary and there will be no significant impacts on marine species. Regarding your concern with the CWP windfarm, the best way to reduce possible effects on commercial fishing is through close communication and cooperation between CWP and local fishermen in order to share information and work together with you to overcome any obstacles that may exist and to help facilitate fishing to continue in and around the proposed wind farm.

In order to capture your feedback on the FILA we would be more than happy to arrange a call with yourself.

1.7 CWPL response to Irish South and East FPO (Submission 7)

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

In order to ensure we cover all your concerns we will take each in turn.

1. Initial Survey Work

CWPL understand the concerns of the FPO in relation to the impacts of survey work on fishing times and grounds. Section 4.6 of the Supplementary Information document submitted to the Department of Housing, Planning and Local Government (DHPLG) provides an assessment of the potential impacts of the proposed survey works on fishing grounds. CWPL will also be undertaking consultation with fishing organisations over the coming weeks and months in order to refine the survey strategy and minimise any potential impacts.

2. Prevention of, Disruption to Fishing and Environmental Impact

The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR for both the offshore and onshore elements of the project. A detailed landscape and visual impact assessment will be carried out as part of the EIAR. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer. This engagement will ensure that stakeholders and the community have the opportunity to provide feedback, discuss any concerns and keep up to date with the project progress. These events will be advertised widely in the local area when planned. All feedback from stakeholders will be considered by Codling Wind Park.

As part of the development of the Environmental Impact Assessment Report (EIAR) a broad range of onshore and offshore surveys will be carried out. These include surveys to assess:

- Sediments and coastal processes
- Water quality
- Benthic ecology
- Fish and shellfish
- Commercial Fish
- Birds
- Marine mammals
- Underwater noise and EMF
- Marine archaeology
- Landscape and visual impact
- Airborne noise

However as this is an application only to undertake studies as opposed to an application for a wind farm an Environmental Impact Assessment is not required for a foreshore licence for site investigation surveys, but, should the area be deemed feasible and a planning application is prepared, an EIA will certainly form part of that application.

3. Inadequate Protection of Fishing Grounds

CWPL appreciates the concerns of the fishing industry in relation to cumulative impacts. The current EIA Regulations (European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018) (EIA Regulations 2018) and 2017 Department of Communications, Climate Action and Environment (DCCAE) Guidance require the likely significant environmental effects of a development to be considered cumulatively with effects to be experienced as consequence other existing or consented projects. CWPL will be undertaking an Environmental Impact Assessment (EIA) Scoping exercise where we will identify all other projects that could add to the cumulative impacts of CWP to all receptors. Through the Scoping exercise we will be engaging with the fishing industry through the appointed FLO to fully understand and discuss the projects of concern to all fishermen.

4. Inadequate Compensation

Codling Wind Park (CWP) recognises the importance of fisheries engagement and the need for early engagement with a wide range of stakeholders and other marine users. Codling Wind Park Ltd has contracted Fishery Liaisons Ltd (FLL), to facilitate the efforts to engage with fisheries stakeholders, and has appointed [redacted] & [redacted] as CWP Fisheries Liaison Officer (FLO). [redacted] & [redacted] are currently engaging with the local fishing community as part of the early consultation on the Foreshore Investigation License Application (FILA). Fishing interests will have an opportunity to discuss the survey plans, and their fishing activity with us in advance of surveys being carried out, and in this regard, we welcome any feedback from yourself.

Engagement with the various fisheries organisations will take place during the FILA process, before and during subsequent marine surveys and throughout the project development itself, in order to inform the Environmental Impact Assessment Report (EIAR) and to reduce potential impacts to the fishing industry.

It would be much appreciated if you have time over the coming weeks for a discussion to capture any specific concerns or feedback that you may have in relation to the CWP FILA. In normal circumstances we would arrange physical meetings with our stakeholders, however with the existing COVID situation we have been arranging online meetings or direct telephone calls to stakeholders as appropriate.

CWPL value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

1.8 CWPL response to Fisher (Submission 8)

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application. CWPL thank you for your support.

Codling Wind Park Ltd value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

Regarding the FILA application we would be more than happy to arrange a call with yourself or have a discussion with you over the coming weeks.

1.9 CWPL response to Cllr Behan (Submission 9)

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application.

CWPL appreciate your concerns relating to the undertaking of the consultation during the pandemic. CWPL were in discussion with the Department of Housing, Planning and Local Government (DHPLG) at the start of this process and have followed the advice given to us in relation to their processes. The application and its supporting information has been made available through various formats both online and physical copy and whilst it is understood that local lockdown restrictions may have prevented residents from accessing hard copies at various points, the restrictions were lifted throughout the consultation period to allow sufficient time for review of these hard copies if reviewing online was not available as an option.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

Regarding the consent application for the proposed windfarm, there will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer. This engagement will ensure that stakeholders and the community can provide feedback, discuss any concerns and keep up to date with the project progress. These events will be advertised widely in the local area when planned. All feedback from stakeholders will be considered by Codling Wind Park.

On a side note and as you are aware, Ireland has declared a climate emergency and needs offshore wind to help meet its challenging renewable energy targets in the fight against climate change. The government published a Climate Action Plan in June 2019 and with it a target of producing 3.5GW of offshore wind power by 2030. According to its Climate Action Plan, Ireland aims to be carbon neutral by 2050 and to double the amount of electricity it produces from renewable energy from 35% to 70% by 2030. This includes 5GW from offshore wind power. Regardless of this policy, our project will only

achieve consent if An Bord Pleanála are satisfied that it meets all planning and environmental regulations.

Ireland has currently a high reliance on imported energy, mainly gas and electricity. CWP will help reduce Ireland's reliance on imported fossil fuels-based energy and increase Ireland's indigenous energy supply. Ireland has a real opportunity when it comes to offshore wind power. Good wind speeds and favourable foreshore conditions provide an ideal environment for generating green electricity offshore. Offshore wind costs have fallen by over fifty per cent in recent years making it viable to produce and supply renewable offshore energy at a competitive price.

Codling Wind Park will deliver many benefits, including:

Environmental

- Clean electricity to supply hundreds of thousands of homes in Ireland
- Removing at least one million tonnes of harmful carbon emissions annually
- Reducing the reliance on imported fossil fuels and providing a secure, low carbon, indigenous electricity supply

Economic

- Offshore wind energy will be a key enabler to unlock new infrastructure investment in Ireland's ports and maritime economy
- Over €1bn investment delivering approximately €250m into the regional and national economy Note: figures to be refined based on final design.
- Hundreds of full-time jobs during construction
- Full-time local jobs for at least a minimum of 25 years
- Operation and maintenance headquarters to be based locally.
- Help create a domestic supply chain that will be vital to Ireland's future offshore renewable energy industry

Social

- A community benefit fund will be established in line with the Offshore Renewable Electricity Support Scheme requirements
- Reduced emissions and a cleaner environment for all.

Codling Wind Park Ltd value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

Regarding the FILA application we would be more than happy to arrange a call with yourself or have a discussion with you over the coming weeks.

1.10 CWPL response to SE Riff (Submission 10)

Thank you for providing comments on the Codling Wind Park (CWP) Foreshore Investigation Licence Application.

It might be worth noting that the consultation that is currently underway is to undertake surveys as part of a Foreshore Investigation Licence that will inform the design and layout of the project, and feed into the environmental impact assessments that will be required, as opposed to an application to construct and operate an offshore windfarm. The potential impacts of the construction and operational phases of the wind farm will be assessed in a comprehensive EIAR that will be prepared by environmental specialists in consultation with a wider range of stakeholders, including the fishing community, as part of the planning application.

In order to ensure we cover all your concerns we will take each in turn;

- The area in question is a key fishery location for the inshore operations of much of the inshore fishing fleet from the east coast ports from Dun Laoghaire extending south to Courtown (including Wicklow and Arklow ports) plus sizeable employment ashore from processing/adding value will be greatly impacted for the following;
    - *Pot fisheries for mainly whelk but also including lobster, crab occupying the entire inshore zone where the proposed survey area is indicated.*
    - *Shellfish/Bi valve molluscs such as king and queen scallop*
    - *Whitefish and pelagic fisheries to a lesser extent*

CWPL appreciate that there is a need for effective liaison with fisheries organisations. In order to fully understand potential impacts, co-existence opportunities and displacement considerations, and guide appropriate mitigation responses it is important to liaise with the fisheries organisations.

- CWP are committed to achieving co-existence; however, it is important to recognise that to achieve this CWP must work closely with the fisheries. Generally, there is no reason why fishing and offshore wind farms cannot co-exist, and fishing continues today in and around many offshore windfarms in many parts of the world. Following construction of the wind farm, no exclusion or safe passage zones are proposed to be implemented above cables or within the development area. During site investigations and construction activities temporary exclusion or safe passage zones surrounding vessels are likely. The best way to ensure fishing can continue around an offshore wind farm is for the developer and local fishers to share information and work together to overcome any obstacles.

- *We acknowledge that this application is for site investigation works, but we believe that these works can negatively affect the financial viability of the fishing enterprises that inshore fishermen depend on, for their livelihoods. We have particular concerns about some of the survey techniques referred to in section 1.4 such as Multichannel High-resolution acoustic seismic surveys i.e. boomers/sparkers. Surveys of fish species in consultation/supervision of fisheries representatives and the Marine Institute etc. should take place before the Investigative works applied for in this application and after they are completed to monitor the impact.*

CWPL have met with both the Marine Institute and the Sea Fisheries Protection Authority prior to submitting the Foreshore Investigation Licence Application (FILA) where fish surveys were discussed however it was agreed that due to the vast selection of data already available that further surveys would not be of benefit at the site investigation stage. CWPL have committed to undertaking fish surveys prior to construction as well as post construction in order to confirm the findings of our Environmental Impact Assessment. Further consultation with the Marine Institute, SFPA and fisheries representatives will be undertaken to inform these surveys.

- *If the surveys proceed it is imperative that adequate communication take place directly with all fishers etc. to ensure that disturbance is minimised, and fishermen should not suffer financially with a loss to their incomes as a result*

Codling Wind Park (CWP) recognises the importance of fisheries engagement and the need for early engagement with a wide range of stakeholders and other marine users. Codling Wind Park Ltd has contracted Fishery Liaisons Ltd (FLL), to facilitate the efforts to engage with fisheries stakeholders, and has appointed [redacted] & [redacted] as CWP Fisheries Liaison Officer (FLO). [redacted] & [redacted] are currently engaging with the local fishing community as part of the early consultation on the Foreshore Investigation License Application (FILA). Fishing interests will have an opportunity to discuss the survey plans, and their fishing activity with us in advance of surveys being carried out, and in this regard, we welcome any feedback from yourself.

Engagement with the various fisheries organisations will take place during the FILA process, before and during subsequent marine surveys and throughout the project development itself, in order to inform the Environmental Impact Assessment Report (EIAR) and to reduce potential impacts to the fishing industry.

- *The SE RIFF as a whole wish to repeat the following general points as to this type of application. While recognising growing climate awareness in Ireland, and the look to renewables such as wind as an alternative energy supply, we are concerned that this is going to be at the cost of our industry, without any organised debate or joined up policy recognising the existence/value of the fisheries sector.*

CWPL will be actively engaging with the fishing industry through the appointed FLO and we will seek to ensure that the construction of CWP is not to the detriment of the fishing industry. As highlighted above CWPL are committed to achieving co-existence.

- *The principal concern of the SE RIFF is the cumulative impact of all the proposed/applied for windfarm sites that straddle the coastal area of counties Wicklow (and north of here into CO. Dublin), Wexford and Waterford. This application is just another that will impact on fishermen from Dublin through Wicklow into North Co. Wexford. We are extremely concerned about the lack of consideration by the relevant State authorities to existing stakeholders that depend on the sea for a living. We are alarmed that to date there is no apparent government or State (departmental or public agency) engagement with our industry, or collective oversight of the impact of proposed windfarms on the seafood sector (fisheries, aquaculture and onshore processing/ancillaries). To state that the collective view of the SE RIFF and industry is one of disillusionment is an understatement, where it is felt that responding to consultations such as this one is meaningless. The SE RIFF and individual fishermen etc. have met with representatives of windfarms but key questions remain unanswered as to the potential impact on our industry. All these key issues require not only answers from the windfarm applicants, but more importantly from State bodies whose role it is to license, manage, and effectively control how we fish and run our fish farms and from this department.*

In relation to cumulative impacts, these are addressed in Appendices 2 and 3 and the list of projects considered listed in Appendix 12. CWPL feel that the cumulative impacts have been addressed within the aforementioned appendices. Going forward, any cumulative impacts in relation to the construction of the wind farm will be assessed in the Environmental Impact Assessment Report that will be submitted in due course with a new planning application.

In relation to the EIAR, it should be noted that, whilst the EIA Regulations 2018 and 2017 guidance states that only projects that are existing or have already received consent need to be considered in the CIA, at this stage other offshore wind farms which have been confirmed as a 'Relevant Project' are also under consideration where they may result in cumulative effects. This list will likely need to be updated and further agreed to ensure that the CIA takes account of all relevant plans and projects. This will be done through periodic review of the list and through consultation with the regulators and consultees during the pre-application process, and further advice and guidance is requested from DHPLG.

- *While companies that wish to engage in offshore activities such as windfarms have time and resources to prepare applications, stakeholders such as fishers have little time and resources to respond. By the time they find out about such an application under a Public Consultation it is too late to effectively organise a response. They see themselves at best reactionary to something that they feel is going to happen whether they like it or not, with at best some minor concessions to be gained.*

CWPL understand the frustrations of the industry and recognise the importance of early engagement with the industry on the construction of an offshore wind project. Engagement with the various fisheries organisations will take place during the FILA process, before and during subsequent marine surveys and throughout the project development itself, in order to inform the Environmental Impact Assessment Report (EIAR) and to reduce potential impacts to the fishing industry. This engagement will hopefully alleviate the concerns the industry has and enable co-existence.

- *Policy and guidelines for the foreshore license application process for wind farms and other such activities (electrical and telecommunication cables, pipelines etc.) must be reviewed and overhauled, in order to protect existing stakeholder actives such as fisheries, to include for example;*

CWP has been in development for some time. During the development phase the project has been compliant with relevant regulations, policy and legislation. Prior to the enactment of the MPDM, the Foreshore Acts 1933 - 2014 (the Foreshore Act) are the core legal instruments for managing the marine and coastal environment and the statutory basis on which an area of the seabed could be leased to a developer of an offshore wind farm. The Foreshore Act granted the appropriate Minister at the Department of Housing, Planning and Local Government (DHPLG) the authority to lease or licence foreshore land belonging to the Irish State where it would be in the public interest to do so.

As you are aware the MPDM Bill updates this Foreshore Act 1933 and addresses the absence of a regulatory framework to regulate offshore renewable energy developments beyond the limits of the foreshore (12 nautical miles). The aim of the Bill is to streamline the consenting process and the Bill is underpinned by a statutory Marine Planning Policy Statement (MPPS) and guided by the National Marine Planning Framework (NMPF).

The new consent application and associated Environmental Impact Statement (EIS) will be progressed under the Transitional Arrangements and it is anticipated that CWP will be among some of the first projects to be submitted to the new MPDM regime once it has been enacted. The transitional arrangements will give guidance to the sector regarding the treatment of certain offshore wind projects (Relevant Projects) in the context of the MPDM.

- *The responsibility of the State to either ensure that adequate knowledge of fishing activities through thoroughly researched baseline data/maps of activity is made available to applicants, or that the onus is placed on applicants to obtain it before an application is submitted. The current foreshore application form details in a strong sense the ability of applicants to demonstrate their awareness of Natura 2000 and other environmentally designated sites. The activities of existing stakeholders such as fishing should at least have the same required consideration.*

The potential impacts of the construction and operational phases of the CWP wind farm will be assessed in a comprehensive EIAR and Natura Impact Statement (NIS) for both the offshore and onshore elements of the project. There will be extensive community and stakeholder engagement including a dedicated website, community information events, meetings and newsletters. This will be led by a Stakeholder Manager, a Community Liaison Officer and a Fisheries Liaison Officer. This engagement will ensure that stakeholders and the community have the opportunity to provide feedback, discuss any concerns and keep up to date with the project progress. These events will be advertised widely in the local area when planned. All feedback from stakeholders will be considered by Codling Wind Park.

- *Applicants should also in advance of an application make available for stakeholders the likely impact of their activity on for example fisheries. This should in include the implications of the survey techniques employed (in the case of the current windfarm applications), but also the overall likely impacts of the overall project once completed (i.e. the impact of the wind turbines when in place on fisheries) including;*
    - *Initial survey work and later during construction/installation, where there is a legitimate fear that such activities can cause a reduction in habitat and fish. The fishing industry in general is unfamiliar with survey techniques used and these need to be detailed/explained.*
    - *In consultations to date regarding other wind farm developments we have been told by windfarm company representatives that there will be no exclusion zones around turbines to fishing activities. However, fishermen have received informal advice that the relevant State authorities may not consider fishing close to turbines as safe, due to increased flow of currents around them and potential for entanglement of fishing gear. This would result in an effective loss of fishing area.*

CWPL recognise the importance of early engagement and to understand the impact to commercial fish species we met with the SFPA ahead of submitting the FILA. Under normal circumstances we would have held fisheries meetings as well however, the pandemic made this difficult around the time of submission and unfortunately, in order to keep the project on track we could not wait to submit the FILA. Going forward, CWPL will be holding in-person or virtual meetings with fishing organisations which will help to explain any survey techniques or other aspects of the project that members are unsure of.

CWPL are committed to achieving co-existence; however, it is important to recognise that to achieve this CWPL must work closely with the fisheries organisations. However, post construction, fishing activity will continue within and around the development area.

- *The onus must therefore be placed on applicants to adequately research fisheries activities and to consult with stakeholders before applying in order to;*
- *Validate the extent of fisheries*
- *Outline the extent of their intended application and the potential impacts of both the survey methods, construction and long-term impacts.*
- *Take onboard the input of the fisheries sector at an early stage*

CWPL have presented their assessment on the potential impacts to fisheries in their Supplementary Information document, this assessment outlined the surveys being proposed, how these could impact the industry and any potential mitigation that we are committing to implementing.

This information is part of the Foreshore Investigation Licence Application that has been submitted to the Department of Housing, Planning and Local Government (DHPLG) which covers the CWP array site and potential export cable routes. If you would like to examine the supporting documents, please access via link below;

https://www.housing.gov.ie/planning/foreshore/applications/fs007045-codling-wind-park-ltd

As mentioned in response to point 5, CWPL will be undertaking an EIA Scoping exercise which will identify any impacts related to the construction, operation and decommissioning phases of the project, throughout this process CWPL will actively engage with the fishing industry to ensure all concerns are addressed within the EIAR.

Codling Wind Park Ltd value the importance of early, transparent and ongoing stakeholder engagement. Offshore wind development is a lengthy process that can take up to ten years, from concept to completion of construction. We look forward to getting to know you and to being proactive in the development of a long-term relationship with you.

Regarding the FILA application we would be more than happy to arrange a call with yourself or have a discussion with you over the coming weeks.