1 [redacted] – PUBLIC SUBMISSION 1

I wish to have the following observations recorded regarding FS007045 Codling Wind Park Ltd.

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).

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.

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.

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 extends 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.

2 COASTAL CONCERN ALLIANCE (CCA) (SUBMISSION 2)

Codling Wind Park Ltd are applying for a foreshore licence to investigate an application for a foreshore lease for construction of a wind farm to the east of the shallow sandbank known as Codling Bank, approximately 13 km off the East coast of Ireland between Greystones and Wicklow. The closest towns of Greystones and Wicklow are both situated some 14.8km from the wind farm area.

Were this massive project to be constructed, it would be the largest offshore wind farm in the world, almost twice as big (2.1GW), as the current largest, Hornsea One (1.2GW), located off the Yorkshire coast. However, while Hornsea One is 120km from shore, the proposed Codling site is 13km off Wicklow, an area of Outstanding Natural Beauty.

Coastal Concern Alliance (CCA) object to the awarding of a foreshore licence for this site. Our objections centre on the following:

1. Site Selection: Developer-led. No resource and constraints analysis

Site selection is acknowledged to be the key to avoiding unnecessary environmental impacts on the receiving environment. This is underlined in the Strategic Environmental Assessment of the National Marine Planning Framework (2019) which emphasises the need for a 'robust site selection process to inform the best technical and environmental locations for any given prioritised activity' (SEA Environmental Report of the Draft National Marine Planning Framework, (SEA of NMPF) p119).

Specific reference is made to Ireland's east coast (SEA of NMPF, p117) stating 'Many of the offshore wind energy sites on the east coast relate to historic licensing / leasing arrangements and the extent of environmental assessment which has been involved in identifying these areas is not clear. Designation of areas for any sectoral activity and / or prioritisation must first and foremost be supported by robust site selection and environmental assessment of the impacts on the receiving environment.

The fact that the professionals (RPS Consulting Engineers) who carried out the SEA of the NMPF were 'not clear' about such important information, highlights the absolute inadequacy of the permitting process applied to the original licence and lease applications. The Codling site was picked out by developers on a 'first come first served' basis almost 20 years ago. There was no pre-selection of appropriate sites by authorities and no resource and constraints analysis was carried out. There was no independent professional assessment of visual impact (See 3. below).

The vast scale of this development is totally inappropriate to the sensitive near shore site selected. Indeed, on the basis of current permitting practice in EU, a development of this scale in such a sensitive location would be highly unlikely to be even proposed in any other country in Western Europe.

The 2.1GW Codling project is too big and too close to shore, just 13km off one of the highest amenity unspoilt coastlines in Ireland. The average distance from shore of offshore wind farms under construction in the EU last year was 59km.

The original site selection (and lease allocation) procedures were demonstrably out of line with good international siting practice. This new Licence Application MUST now comply with best practice and be assessed with the required rigor appropriate to any massive industrial development proposed in such a sensitive location 'in the public interest'.

2. Offshore Renewable Energy Development Plan (OREDP) 2014: Discredited and due for revision in 2020

The OREDP is referenced to underpin the current Licence Application. (Codling Wind Park Foreshore Investigation Licence Application. Supplementary Information. 1.3.1) CCA challenge the legitimacy of this.

Following extensive lobbying by development interests, in 2010 in the Introduction to the Environmental Report of the OREDP (with reference to the Codling development and others) it was stated 'Whilst these offshore wind projects need to be taken into account in the SEA in the context that these are existing or potential future developments, a Parliamentary Statement, provided by Eamon Ryan, Minister of DCENR confirmed that the SEA should not influence or affect the processing of existing Foreshore Lease applications.'

We attach a document (Appendix 1) outlining the manner in which, at the public consultation stage, these projects were described as 'already existing infrastructure'. Throughout the SEA of the OREDP,

the authors acknowledge the inadequacy of background data informing the Assessment, not least in the highly important area of landscape assessment.

We have outlined in 1. (above) that, in 2019, the engineering consultants who carried out the SEA of the NMPF stated that they were 'not clear' about the extent of environmental assessment which has been involved in east coast projects. The fact that highly qualified experts had this difficulty underlines the historic mismanagement involved in the drafting of this Plan and the unreliability of the OREDP.

The OREDP, drafted in 2010, has been widely criticised and is due for revision in 2020. Its conclusions are clearly open to question and cannot in any way be deemed to underpin or confer legitimacy on the current Codling application as 'already existing renewable infrastructure'.

3. Outdated legislation and inadequate regulation

The original licence and lease for the 1100MW offshore wind park was awarded to the developers (Fred Olsen Renewables and Treasury Holdings) in 2005 in an inappropriate low-key manner, without a single submission from the public.

The 99-year lease for what was then the largest offshore wind farm in the world was awarded under outdated legislation, The Foreshore Act 1933, drawn up before offshore wind farms were envisaged. This legislation, long acknowledged to be unfit for purpose, is currently under reform.

The manner in which the original lease for the Codling Wind Park was awarded at the height of the Celtic Tiger contravened Irish and EU legislation and was demonstrably out of line with good international practice at the time.

The lease was awarded on the sole authority of the Minister for the Marine (Noel Dempsey). There was no national strategic marine plan, no public tender, no statutory involvement of local authorities, no public right of appeal and no independent professional assessment of visual impact.

The visual impact of this giant development was clearly an issue of grave public importance given the sensitive, near shore site chosen by developers, close to the high amenity South Dublin and Wicklow coastline.

In answer to a query as to how the visual impact of this giant, near shore project was assessed by the advisory Marine Licence Vetting Committee (who did not have appropriate landscape expertise and did not commission an independent visual impact assessment) CCA received an email (DCMNR, 23/9/2005, available on request) stating that 'the decision (to award the lease) is made personally by the Minister and in the most recent case before him he personally viewed the photomontages'.

This was clearly a totally inappropriate and inadequate way to properly assess the environmental impact of the Codling Wind Park 1 with 200 turbines, on the high amenity coasts of S. Dublin, Killiney Bay, Bray/Bray Head, Greystones and the County Wicklow.

The SEA of the NMPF, referenced above, states, with regard to the impacts of ORE installations on seascape/landscape 'the only mitigation is avoidance which requires movement of the ORE area, which is unable to be addressed at project level once foreshore licence and lease areas have been allocated (SEA of NMPF, p119). Visual Impact is matter of huge public concern throughout EU and USA.

This new application for a site investigation licence is being submitted for approval under discredited foreshore legislation, on an extensive near shore site picked out by developers without any environmental constraints (and in the absence of the imminent designation by Government of Strategic Marine Activity Zones, subject to SEA). If the current Minister is to act in the public interest as required by The Foreshore Act 1933, then, in view of the above, he has responsibility to ensure that as part of the assessment process, an initial environmental impact analysis, including visual impact analysis, is carried out before an investigative foreshore licence is awarded.

4. REFORM - National Marine Planning Framework and Foreshore legislation

CCA have been lobbying for reform of foreshore legislation and the introduction of a democratic system of marine spatial planning since our foundation. The manner in which this sensitive, near shore site was awarded to developers in an era of speculation and inadequate regulation, and has been advanced through an undemocratic, inadequate regulatory system in an incremental fashion over the past 15 years, would not stand up to the most cursory public scrutiny as being in the public interest. Shareholders linked to Treasury Holding, the original promoters of the project, have this year sold on, (before construction) a 50% share in the foreshore lease, acquired without any public tender in 2005, for a reputed €100m.

Awarding a foreshore licence to the vast new proposed project confers on it a degree of legitimacy which is clearly not warranted by its history to date. The Irish people deserve the magnificent Dublin /Wicklow coastline to be protected in the public interest as a central part of Irish heritage.

In view of the many legislative and procedural concerns, the absence of democratic process surrounding this giant industrial project and its vast environmental impacts (biodiversity and landscape) Coastal Concern Alliance call on the Minister to refuse a Foreshore Licence for this project until the many public interest concerns surrounding it have been addressed.

In addition, we call on the Minister and his Government colleagues to examine and address what has been described as 'the dysfunctional incrementalism' which continues to pose a serious threat to the Irish east coast, its biodiversity and landscapes. The foreshore leases and licences awarded under the outdated and undemocratic Foreshore Act 1933, in breach of Irish and EU legislation, continue to shape the future of our East coast. Further evidence is provided by the recent designation by Ministers Damien English and Richard Bruton of 'legacy projects' as 'relevant projects' for fast tracking under the new marine planning regime.

Coastal Concern Alliance are not in any way opposed to renewable energy development; we simply want best practice which is currently not adhered to in Ireland. We have been lobbying for the introduction of marine planning since 2006 and welcome the marine reform which is now underway.

However, we are very aware of research on Marine Spatial Planning in other EU countries which shows that, in spite of promises of democratic ecosystem-based reform, marine spatial planning is largely shaped by powerful elite actors (Assessing marine spatial planning governmentality, Wesley Flannery, Ben McAteer, April 2020). In the public interest it is vital that Ireland learns from experience in other countries and introduces new systems of marine spatial planning and of foreshore governance, which will provide an example of good practice internationally.

3 TRANSPORT INFRASTRUCTURE IRELAND (TII) (SUBMISSION 3)

Transport Infrastructure Ireland (TII) wishes to advise that it is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer/scheme promoter should have regard, *inter alia*, to the following;

- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes (e.g. Dublin Eastern Bypass Scheme) in the vicinity of on-shore elements of the subject development proposal, such as grid connection proposals, substation works, etc.

- TII would be specifically concerned as to potential significant impacts the development would have on the existing national road network (and junctions with national roads) in the proximity of the onshore elements of the proposed development,

- The developer should assess visual impacts from existing national roads.

- The developer should have regard to any Environmental Impact Statement/Assessment and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area of any onshore elements concerned. The developer should in particular have regard to any potential cumulative impacts.

- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works) in relation to any onshore elements concerned in the vicinity of national roads.

- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006).

- The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1st Rev., National Roads Authority, 2004)).

- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site of on-shore elements of the proposed development and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. The Authority's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA.

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required for any onshore works associated with the proposed development.

- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any onshore works traversing/in proximity to the national road network.

- In relation to haul route identification associated with any onshore works, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits, and other licences may be required in connection with the proposed haul route, including where temporary modification to the road network may be required. Consultation with relevant PPP Companies and MMaRC Contractors may also be required. All structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed,

- Where any modifications to onshore grid connection may be required in the subject development, the scheme promoter should note locations of existing and future national road schemes and develop proposals to safeguard proposed road schemes. In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. On-shore cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network and/or motorway network where applicable.

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus onshore site and development specific issues should be addressed in accordance with best practise.

4 [redacted] FISHER (SUBMISSION 4)

I'm a commercial fisherman here on the east coast of Ireland. I wish to object to the Wind Park development. I have a valid fishing licence for our boat, "[redacted]". We are fearful that any and all works associated with construction and development of wind turbines at sea will have a detrimental impact on our fishing and business. We have been here fishing for 30+ years and wish to

continue into the future without any issues like this causing financial disturbances to the business that we are in.

5 [redacted] – FISHERS (SUBMISSION 5)

We, [redacted], [redacted], Arklow, Co. Wicklow, registered owners and operators of F/V "[redacted]" and "[redacted]", hereby give notice of any and all interested parties in the CODLING WINDPARK, that we wish to register an objection to any and all works carried out on same proposed works on the Codling Bank Windpark.

As owners of boats and licences, it's our belief that any works carried out on erecting wind turbines will cause irreputable damage to the area, fish stocks, and wildlife. Also, in the past boats that were fishing in the area were displaced, and displaced into areas that we would traditionally work, that had an enormous impact on our catch rate, with many more vessels all competing to catch the same species.

We object on many issues, but the main reason is that we have in the past worked as fishers, we wish to continue or business into the future.

6 [redacted] – FISHER (SUBMISSION 6)

I would like to submit an objection to the above planning reference number.

I am a commercial fisherman and operate on the East Coast of Ireland I fish directly in this area, having read this application my objection is based on but not limited to the fact that the area I fish in forms a large part of the foreshore application. Which poses an unquantifiable risk to my business, the species I fish and the food Web that sustains the biomass which poses a significant risk to my business and employees. As a business owner I like to support this, but it should be done without risk to my business.

7 IRISH SOUTH AND EAST FPO (SUBMISSION 7)

The Irish South and East Fish Producers Organisation is a representative body with over 60 members in most of the fisheries in operation in European Waters. They are anxious that their members voice be heard in relation to this consultation process.

The Irish South and East Fish Producers Organisation (IS&EPO) are concerned in relation to the preconstruction phase and the post Construction phase.

The areas of concern are:

- Initial Survey Work
- Prevention of fishing
- Disruption to fishing
- Environmental Impact
- Inadequate protection of fishing grounds
- Inadequate compensation
- disruption to ongoing fishing operations into the future.

INITIAL SURVEY WORK

There is no package of survey works which are required to be sone in advance of construction etc that will not have a major disruption to fishing operations in the area. This is not something which has involved any consultation with the industry. There has been no enquiry as to what might be the least

disruptive time and there has been no analysis of whether this is a spawning ground or whether or not the time period envisaged would be a period of spawning.

Thus, survey work could have an initial impact and a long-term impact.

PREVENTION OF FISHING

The first issue is the risk associated with turbines stanchions, exposed cables, rock armouring, cable crossing points and waste material (debris) to fishing. Referring to the period following decommissioning, fishermen and a fisheries officer expressed concern over the remnants of wind farm infrastructure and materials and the potential impact it could have on future fishing opportunities. Concern was also raised about the potential effect of removing Offshore Wind Farms (OWF) infrastructure.

DISRUPTION TO FISHING

Wind farm maintenance work causes disruption to fishing. Operations within and around wind farms. Conflict with OWF maintenance vessels, excessive area closures for maintenance work, and poor communication between fishermen and maintenance vessel operators was reported by fishermen. Usually there is an increased steaming distance and time to fishing grounds beyond the OWFs.

ENVIRONMENTAL IMPACT

There is a potential adverse environmental effect of OWFs. There is a reduced quantity and quality of Nephrops and lower quantities of commercial demersal fish when approaching and within OWFs.

INADEQUATE PROTECTION OF FISHING GROUNDS

There is a cumulative spatial encroachment of (and initiators) OWFs and marine conservation requirements on fishing grounds, compounded by restrictions imposed by EU, national and regional fisheries

The financial and economic value of fisheries was probably underestimated

INADEQUATE COMPENSATION

This is an economic venture where the developer is hoping to, ultimately, acquire wealth. The Fisherman has been on the seas in this area for hundreds of years in this area and therefore his rights proceed the rights of a new endeavour which permanently interferes with the rights of the Fisher.

No consultation has taken place in relation to any proposal as to compensation should this scheme go ahead.

8 [redacted] – FISHER (SUBMISSION 8)

I WISH TO MAKE THE FOLLOWING SUBMISSION RE THE ABOVE:

THE PROPOSED WINDFARM IS A GOOD DEVELOPEMENT AND SHOULD BE GIVEN PERMISSION. I AM A FISHERMAN AND WOULD LIKE TO SEE FULL USE MADE OF THIS AREA FOR PRODUCING CLEAN ENERGY FOR IRELAND. I WOULD LIKE TO SEE FULL ACCESS THROUGH THE WINDFARM FOR ANY FISHING TRAWLER THAT NEEDS TO PASS THROUGH IT IN ORDER TO GET TO AND FROM FISHING GROUNDS. I WOULD LIKE TO SEE EXISTING RIGHTS TO FISH HERE MAINTAINED. THE CONNECTING ELECTRIC CABLES SHOULD BE BURIED.

9 CLLR JOE BEHAN (SUBMISSION 9)

I received some information recently about the application to investigate the development of a major wind farm off the coast of County Wicklow.

I am concerned that the timing of this application during Covid 19 has resulted in very little public awareness of the scale and implications of this development on the coastline of County Wicklow.

I am also concerned at the actual impact the initial investigation process will involve and I call on the Department to delay the granting of permission for this investigation until such a time as the wider general public can meaningfully contribute to the debate on this project.

10 **SE RIFF (SUBMISSION 10)**

The South East Regional Inshore Fisheries Forum (SE RIFF) is one of 6 regional Inshore Fisheries consultative forums, at which members are representative of the 'inshore sector' fishermen using boats of less than 12m in overall length.

Established in May 2014 the National Inshore Fisheries Forum has been set up to facilitate the development of a coherent inshore sector "voice" by encouraging fishermen to discuss their fishing issues and generate commonly supported initiatives. The National Inshore Fisheries Forum (NIFF) is supported by a network of Regional Inshore Fisheries Forums (RIFFs around the coast of Ireland. They have nominated delegates to bring forward regional proposals to NIFF for wider industry discussion. The RIFF members include inshore fishermen, environmental interests, marine leisure, marine tourism, processors (seafood added value) and other marine stakeholders.

The Inshore Fisheries Forums are facilitated by the statutory bodies responsible for marine fisheries in Ireland, namely Department of Agriculture, Food and the Marine, Bord Iascaigh Mhara, Sea Fisheries Protection Agency and the Marine Institute. Bord Iascaigh Mhara provides administrative support to the forums.

The South East RIFF covers the inshore coastal area of counties Wicklow, Wexford and Waterford. Further information concerning the South East RIFF and RIFFs in general can be obtained at http://inshoreforums.ie/

The link to the documentation for this proposed development has been sent to the members of the SE RIFF with the following observation made by members with a knowledge of the area in questions.

- 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

- 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 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.

- 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

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.

- 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.

- 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.

- It is our view that there is a collective State responsibility to ensure that the fisheries sector including inshore fisheries is protected, due to the contribution made by the sector to local coastal communities. The sector should not have to react to every application on a case by case basis in this manner without formal support of its position. What has happed to the Spatial Plan that is required under EU legislation/directives? Due to the size and scale of this application, proposals such as this cannot be considered adequately without an overall spatial plan considering all the current recognised stakeholder activities such as fishing.

- 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;

    - 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.

- 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.

- 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

Again, we ask that to facilitate the above points the SE RIFF urges that representatives of your department meet with representatives of the inshore fisheries sector such as through the Inshore Forums, and the relevant departments that effectively control our activities, or other representative structures.