

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED CROAGHAUN WIND FARM, CO. CARLOW

VOLUME 2 – MAIN EIAR

CHAPTER 5 – EIA SCOPING, CONSULTATION AND KEY ISSUES

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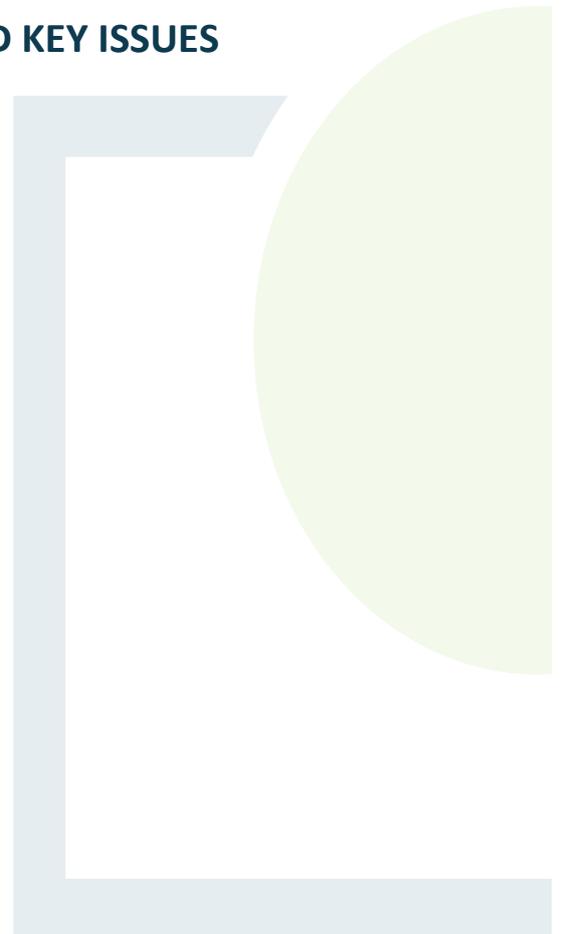


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5. EIA SCOPING, CONSULTATION AND KEY ISSUES

5.1 Introduction

Consultation is an important part of the Environmental Impact Assessment (EIA) process. This chapter describes the consultation process and EIAR scoping that was undertaken in order to identify key effects from the proposed Croaghaun Wind Farm development to be included in the EIAR. The consultation process carried out for the proposed development site has been a lengthy, detailed and thorough. A number of points and submissions were raised as part of the consultation process which have informed the project design and this EIAR.

The following chapter presents the key points that arose through the consultation process and how these points were assessed in the EIAR. The consultation process, scoping and pre-application consultation undertaken in respect of the proposed development are set out in this chapter.

Through the consultation process, specific regard has been taken to the Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement published on the 21st December 2016 by the Department of Communications, Climate Action and the Environment. “This Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country”. The developer had regard throughout the pre-planning process of the practical steps that renewable energy promoters should comply with, in engaging with communities as set out in this Guidance. (See Chapter 4 for further detail).

5.2 Scoping

The purpose of the EIA scoping process is to identify the key points and issues which are likely to be important during the environmental impact assessment (EIA) of a project and to eliminate those that are not. The scoping process identifies sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors which are likely to be affected. It defines the appropriate level of detail for the information to be provided in the EIAR. In essence, the primary focus of scoping is to define the most appropriate assessment of significant effects related to the proposed development.

A scoping request letter and scoping report detailing a description of the proposed project, draft mapping, preliminary table of contents of the EIAR and outline of the methodology for assessment was distributed to consultees on the 19th of December 2019. The recipients included the Local Authority, Government Departments, non-governmental organisations (NGOs), interested parties and key stakeholders. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey methodologies and potential impacts that should be considered as part of the impact assessment process and in preparation of the EIAR.

Table 5.1 details the list of consultees who were issued a copy of the scoping document. A copy of the scoping request and scoping report are included in Appendix 5.2.



Table 5-1: List of Consultees

Type of Stakeholder	Body / Department
Carlow County Council	Planning Department
	Heritage Officer
	Environment Department
	Roads Department
	Archaeologist
Kilkenny County Council	Planning Department
	Heritage Officer
	Environment Department
	Roads Department
	Archaeologist
Wexford County Council	Planning Department
	Heritage Officer
	Environment Department
	Roads Department
	Archaeologist
Wicklow County Council	Planning Department
	Heritage Officer
	Environment Department
	Roads Department
	Archaeologist
Government Departments	Department of Communications, Climate Action and Environment
	Department of Housing, Planning, Community and Local Government
	Department of Agriculture, Food and the Marine
	Department of Culture, Heritage and the Gaeltacht
	Development Applications Unit (National Monuments Service)
	Development Applications Unit (Nature Conservation)
	Department of Defence
	Department of Transport, Tourism and Sport
NGOs and Stakeholders	An Taisce
	Birdwatch Ireland
	Carlow Branch of Birdwatch Ireland
	Fáilte Ireland
	Teagasc
	EPA
	Southern Regional Assembly



Type of Stakeholder	Body / Department
	Irish Farmers Association
	The Blackstairs Farming Group
	Irish Peatland Conservation Council
	The Heritage Council
	Sustainable Energy Authority of Ireland
	Inland Fisheries Ireland
	Irish Red Grouse Association
	National Trails Office
	South Eastern River Basin District
	Irish Wildlife Trust
	Irish Sports Council
	Commission for Energy Regulation
	Geological Survey of Ireland
	Health Service Executive
	Office of Public Works
	Transport Infrastructure Ireland
	Bat Conservation Ireland
	Irish Raptor Study Group
	Gas Networks Ireland
	Iarnród Éireann
	Irish Water
	The Arts Council
	Transport Infrastructure Ireland
	Údarás na Gaeltachta
	Waterways Ireland
	The Irish Hang Gliding and Paragliding Association
	Three Counties Energy Agency (3CEA)
	Telecommunication / Aviation
Telecommunications Section, An Garda Síochána	
IT Department, Carlow County Council	
Irish Broadband/Imagine	
Digiweb Dublin Offices and Data Centre	
Ripplecom	
Magnet Networks	
BT Communications Ireland Ltd	
Dublin Airport Authority	
Commission for Communications Regulation	



Type of Stakeholder	Body / Department
	RTE
	Virgin Media Ireland
	Eir
	Broadcasting Authority of Ireland
	Vodafone
	Three
	ESB Telecoms
	TETRA Ireland Ltd.
	Premier Broadband
	Wireless Connect Ltd.
	Irish Telecom
	TowerCom Ltd.
	Arra Communications
	Wireless Connect Ltd.

Full details of the scoping responses received are set out in Appendix 5-1. A summary of the consultation responses received are presented in Table 5.2:

Table 5-2: Summary of EIAR Scoping Responses

Consultee	Date of Response	Response / Key Points raised	Chapter of EIAR where Key Points Raised are Addressed
Transport Infrastructure Ireland	09 January 2020	Safeguard the national roads network, identify haul route, best practice traffic management, TII standards and guidelines.	Chapter 13 – Traffic & Transportation
Inland Fisheries Ireland	06 January 2020	Extent of soil clearance for excavation, potential for soil erosion, migration of soil to streams and associated mitigation. Overview of drainage. Sampling of watercourses. Potential impact to aquatic ecology.	Chapter 8 - Biodiversity Chapter 9 – Land, Soils and Geology Chapter 10 – Hydrology & Water Quality



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Carlow County Council – Roads Department	05 February 2020	Provision of traffic impact assessment, traffic types and volumes, access route, impact of HGVs, design of entrance, swept path analysis, load of turbine components, road condition survey and road improvements.	Chapter 13 – Traffic & Transportation
Carlow County Council – Planning Department	05 February 2020	Assessment of grid route, compliance with Carlow County Planning Policy, Landscape and visual assessment, natural heritage, Appropriate Assessment, Archaeology, Residential Amenity, Land Use, Noise & Vibration, Air Quality, Biodiversity, Water Quality & Drainage, Traffic as detailed above.	Chapter 6 – Air & Climate Chapter 7 – Noise & Vibration Chapter 8 - Biodiversity Chapter 9 – Land, Soils and Geology Chapter 10 – Hydrology & Water Quality Chapter 11 – Population & Human Health Chapter 12 – Shadow Flicker Chapter 13 – Traffic & Transportation Chapter 14 – Archaeology, Architectural and Cultural Heritage Chapter 15 – Landscape & Visuals
Environmental Protection Agency	10 January 2020	Proposed development does not form part of an EPA licensed facility, therefore, the Agency has no comment to make.	N/A
EIR (Eircom)	23 December 2019	Confirmed that the proposed development would not impact on transmission services.	Chapter 16 - Telecommunications and Aviation
CIE	20 December 2019	Question as to whether the proposed development involves any interface with the railway.	N/A
Fáilte Ireland	13 February 2020	Received Guidelines for the Treatment of Tourism in an EIAR.	Chapter 11 – Population & Human Health



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Department of Communication, Climate Action & Environment - Geological Survey Ireland	31 January 2020	Comments on Geoheritage, Groundwater, Geohazards, Geothermal Energy & Natural Resources	Chapter 9 – Land, Soils, Geology & Hydrogeology Chapter 11 – Population, Human Health & Material Assets
Three	10 January 2020 / 20 February 2020	Request for turbine layout in KMZ file, Irish Grid Coordinates or Shapefile. Follow up with confirmation that existing and planned links will not be affected.	Chapter 16 - Telecommunications and Aviation
The Irish Hang Gliding and Paragliding Association	08 January 2020	Request for coordinates of the proposed wind turbines.	N/A
ESB Telecom	02 January 2020	Confirmation that no microwave or polling radio links would be impacted by this proposed windfarm development.	Chapter 16 - Telecommunications and Aviation
Broadcasting Authority of Ireland	20 December 2019	Confirmation that proposed turbines are not located in proximity to existing or planned FM transmission sites.	Chapter 16 - Telecommunications and Aviation
Department of Culture, Heritage and the Gaeltacht (DAU)	19 December 2019	Acknowledged Receipt by Email	N/A
Department of Transport Tourism and Sport	19 December 2019	Acknowledged Receipt by Email	N/A
An Garda Síochána	19 December 2019	Acknowledged Receipt by Email	N/A
BT Communications Ireland Ltd	18 December 2019	Acknowledged Receipt by Email	N/A
Health Service Executive	18 December 2019	Acknowledged Receipt by Email	N/A
Commission for Communications Regulation	18 December 2019	Acknowledged Receipt by Email	N/A



5.2.1 Key Issues Raised During Scoping Process

The scoping process proved beneficial to the identification of potential issues in relation to the proposed Croaghaun Wind Farm. Responses from the consultees identified a range of observations which have been taken into consideration in the preparation of the respective chapters of this EIAR. All scoping responses are included in Appendix 5.2 of Volume 3 of this EIAR.

Issues raised during the scoping process are as follows:

Transport Infrastructure Ireland

Recommendations from TII for the preparation of the EIAR are as follows:

- As outlined in the Spatial Planning and National Roads Guidelines, it is the public interest that, in so far as is reasonably possible, that the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
- Consultations should be had with the relevant local authority/National Roads Design Office with regard to locations of existing and future national road schemes.
- In relation to cabling and potential connection routing, 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 should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. Impact to TII infrastructure should be avoided and consultation should occur if works are required to such infrastructure.
- 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. Consultation with the relevant Public Private Partnership (PPP) Companies and Motorway Maintenance and Renewals Contractors (MMaRC) 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.
- 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 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. Regard should be had to the Authority's Traffic and Transport Assessment Guidelines (2014) and Section 2.2 of the TII TTA Guidelines.
- TII standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
- Assessment and design and construction and maintenance standards and guidance are available at TII Publications that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
- The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences.



- In particular:
 - a) 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).
 - b) The EIAR should consider the Environmental Noise Regulations 2006 (S.I. 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).

Chapter 13 - Traffic and Transportation was compiled in line with TII observations and recommendations. TII guidelines were used where relevant and recommendations such as the requirement for a Road Safety Audit and Road Safety Impact Assessment were taken on board in the preparation of the chapter. Horizontal directional drilling is proposed where the cable route traverses the N80 national primary route to safeguard the national asset and avoid impacts on future expansion as set out in the advice note. Visual impact has been assessed from national routes in Chapter 15 - Landscape and Visual. Alternatives for the grid route and haul routes have been assessed in Chapter 2 – Site Selection and Alternatives in line with TII recommendations.

Inland Fisheries Ireland

Inland Fisheries Ireland (IFI) set out concerns for potential of peat soils/subsoils erosion due to excavation as a result of the proposed development. This has potential to deposit significant quantities of suspended solids and associated nutrients to downstream waters. IFI requested clarification of soil clearance and depth/extent of excavation for the turbine bases proposed. IFI requested mitigation measures for the prevention of soil disturbance and erosion during excavation and heavy load movement to avoid the soiling of watercourses. The storage of excavated materials should also be considered. The IFI requested that soil type and structure at turbine locations be assessed.

IFI requested that the existing drainage of the site be detailed including watercourses and forestry drains. IFI set out their concern due to excavations relating to the internal underground cable network and potential for this to lead to erosion and interference to the natural drainage system. The IFI also voiced concerns regarding the proposed on-site borrow pit having regard to potential pollution to downstream waters.

IFI recommended biological sampling of watercourses to accurately monitor potential pollution events.

The IFI detailed concerns of potential impact to aquatic ecology and habitat of downstream watercourses by way of a potential polluting event and requested safeguards be out in place. Attention should be paid to construction methods and vehicle movements to avoid such impacts. The IFI also requested that all oils and fuels be stored in bunded areas and refuelling of machinery take place in a bunded area. Oil interceptors should be used on site to avoid potential impact to watercourses.

Attention should be paid to the various environmental directives including the Water Framework Directive, the Habitat and Birds Directives, the Fisheries Acts and Local Government (Water Pollution) Acts

The IFI's scoping response was considered and recommendations incorporated into the proposed development and EIAR. Issues relating to soils are considered in Chapter 9 – Land, Soils and Geology and appropriate mitigation is detailed as requested by IFI. Issues relating to watercourses and drainage is considered in Chapter 10 – Hydrology and Water Quality. Potential impact to species and habitats of concern to the IFI is detailed in Chapter 8 – Biodiversity.



Carlow County Council Roads Department

A response to the scoping consultation was received from Carlow County Council Roads Department, highlighting a number of points regarding traffic and transportation to be considered in the EIAR of the proposed Croaghaun Wind Farm. The Roads Department's requests are as follows:

- “The provision of a traffic impact assessment for the construction phase.
- Details of the anticipated traffic types and volumes for the development should be provided and assessed, and broken down in daily, weekly and monthly figures. Details should also include expected peak site traffic, day to day hours and duration.
- Proposed access route(s) for turbine delivery should be clearly identified on suitably scaled maps. Access routes should seek to predominantly utilise main roads, and therefore minimise the use of and impacts on county and local roads.
- Potential traffic impacts from HGVs negotiating built up areas should be considered, as well as the feasibility of avoiding routing HGV traffic through such locations.
- Full design details for the entrance(s) to the site should be provided to demonstrate adequate turning movements for HGVs and sightlines. Accommodation works on third party lands must have written agreement of third-party landowners.
- A swept path analysis should be carried for the proposed turbine delivery route(s).
- Estimated load of turbine components should be provided.
- All structures on the proposed access route(s) to the site should be evaluated for ability to carry respective weights of transportation vehicles and turbines i.e. including width and structural capacity of proposed access routes.
- A condition survey of the public roads from which the site is proposed to be accessed should be carried out, including a survey of the road from Carrickduff to Kilbrannish.
- Proposals to upgrade a road or structure where it is shown to be structurally unsuitable should be provided.”

A detailed response was submitted to the Carlow County Council Roads Department explaining how these requests will be considered in the EIAR and the design of the project. Chapter 13 – Traffic and Transportation considers points raised by the Roads Department.

Carlow County Council Planning Department

A comprehensive scoping response was received from Carlow County Council's Planning Department. The response details legislation, policy, guidelines and case law which the project and the EIAR should have regard to. With respect to the grid connection element of the project, the response states that cumulative impact should be considered in line with the O’Grianna v. An Bord Pleanála (2014) judgment. The response also details extracts from the Draft Revised Wind Energy Development Guidelines December (2019) with respect to the assessment of grid connections as part of the project.

Carlow County Planning Policy is highlighted in relation to wind energy developments including the promotion and facilitation of wind energy development at suitable sites, in line with the Wind Energy Development Guidelines. Compliance with the Carlow Wind Energy Strategy should be demonstrated.



In relation to Landscape and Visual Impact Assessment, the assessment should take account of the County Landscape Character assessment and schedule of protected views. Important landscape features are noted in relation to protection from inappropriate development and potential for cumulative impacts in combination with other wind farm developments. Assessment of specific views are detailed including a request for photomontages.

The scoping response requests that the EIA considers proximity to SACs, hydrological features, sensitive ecology, felling and replanting and recommends appropriate field studies in relation to natural heritage. The response also details good practice for Appropriate Assessment.

The response also refers to Archaeological Heritage, potential impact to residential amenity and land use, potential impact from noise vibration and dust, assessments for flora and fauna, water quality and drainage and traffic and transport as detailed above.

The planning department's response relates to various aspects of wind energy development. The response has been considered in the following chapters:

- Chapter 4 - Policy
- Chapter 6 – Air & Climate
- Chapter 7 – Noise & Vibration
- Chapter 8 - Biodiversity
- Chapter 9 – Land, Soils and Geology
- Chapter 10 – Hydrology & Water Quality
- Chapter 11 – Population & Human Health
- Chapter 12 – Shadow Flicker
- Chapter 13 – Traffic & Transportation
- Chapter 14 – Archaeology, Architectural and Cultural Heritage
- Chapter 15 – Landscape & Visuals

Department of Communication, Climate Action & Environment - Geological Survey

A scoping response was received from the Department of Communications, Climate Action and Environment's Geological Survey Ireland (GSI). The response refers to County Geological Sites and one such site, Aclare House, in proximity to the proposed Croaghaun Wind Farm. This site is home to the largest lithium-bearing pegmatite deposit in the Leinster region. With this in mind, the response refers to potential future economic impacts to the area should the current proposal impact future development of the extractive industries in the general area.

In relation to groundwater, the GSI state that the area of the site is characterized by a Locally Important Bedrock Aquifer which is moderately productive only in local zones and has a vulnerability rating of extreme. Regard should be had to SI's National Aquifer and Recharge maps (online resource).

The response notes that Landslides are common in areas of peat or steep slopes, areas which are found within the proposed development. While there are no documented landslide events within the proposed area, they are common in high ground to the northeast of the site. It is recommended that geohazards be taken into consideration, especially when developing areas where these risks are prevalent.



GSI highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. GSI also recommend the use of a variety of online mapping resources to understand baseline conditions.

Geological Survey Ireland's response has been considered in Chapter 9 – Land, Soils and Geology and Chapter 11 – Population, Human Health and Material Assets. The online mapping resources recommended by GSI were utilised in the assessment as set out in Chapter 9.

Fáilte Ireland

In response to the scoping request, Fáilte Ireland provided a guideline on tourism and environmental impacts, published in 2011, entitled 'Guidelines on the Treatment of Tourism in an Environmental Impact Statement'. Of note from Fáilte Ireland's Guidelines is in respect of the assessment of potential effects arising from a proposed development on tourism, the following has been considered:

- Indicate the numbers of premises and visitors likely to be affected directly and indirectly.
- Identify and quantify, where possible, the potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.
- Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.
- Indicate any commercial tourism activity which is likely to be directly affected, with resultant environmental impacts.

This document has been considered, as recommended by Fáilte Ireland. Chapter 11: Population, Human Health and Material Assets describes the potential impacts on recreation, amenity and tourism as a result of the proposed development and in consideration of Fáilte Ireland's guidance.

5.3 Consultation with Key Stakeholders

5.3.1 Pre-planning Meeting with Carlow County Council

A pre-planning meeting was held on Monday the 2nd of March 2020 in the Carlow County Council buildings. The following people were in attendance:

- Planner - Carlow County Council
- Environmental Officer - Carlow County Council
- Project Manager – Coillte
- Planning Manager – Coillte
- Senior Engineer – Fehily Timoney & Company
- Director of Services – Fehily Timoney & Company

Representatives from Coillte and Fehily Timoney presented the Croaghaun Wind Farm project including initial environmental assessments, design solutions and the community engagement conducted to date.



During the meeting Carlow County Council representatives set out the policy context and landscape character for the proposed wind farm site, referring to sensitivities such as scenic views and potential for traffic impact on national routes. Furthermore, the County Council highlighted the need for the structural assessment of bridges along the turbine delivery route. The County Council also encouraged public engagement as part of development of the project.

The comments made by Carlow County Council during the meeting were considered with respect to the environmental impact assessment and design of the project. The structural assessment of bridges along the turbine delivery route is referred to in Chapter 13 – Traffic and Transport.

5.3.2 Second Pre-planning Meeting with Carlow County Council

A Second Pre-planning meeting was held with Carlow County Council in order to present the development of the project to the Carlow County Council Case Planner appointed to the project. The meeting took place on the 3rd of November 2020. The following people were in attendance:

- Planner - Carlow County Council
- Project Manager – Coillte
- Planning Manager – Coillte
- Senior Engineer – Fehily Timoney & Company
- Director of Services – Fehily Timoney & Company

5.3.3 Consultation with Inland Fisheries Ireland

Inland Fisheries Ireland (IFI) were contacted as part of the EIAR Scoping Process for the Croaghaun Wind Farm. Follow up correspondence was submitted to IFI by a FT hydrologist on the 5th of August 2020. FT proposed to meet a representative of the IFI at the Croaghaun Wind Farm site to discuss the project and identify potential significant hydrology features. Correspondence was received confirming that the message was forwarded to the relevant IFI environmental officer. Further correspondence was forwarded to IFI on the 15th of September 2020 requesting comments on areas of the project which were not referred to in the scoping response, such as the grid route element of the project and turbine delivery route. IFI followed up on the 21st of September 2020 with a response voicing concerns of potential for suspended solids generation and pollution of nearby watercourses as a result of construction works. Mitigation measures have been designed to avoid sedimentation of streams. These measures are set out in Chapter 9 – Land, Soils and Geology and Chapter 10 – Hydrology & Water Quality.

5.3.4 Consultation with National Parks and Wildlife Service

As well as contacting the NPWS through the Development Applications Unit (DAU) as part of the scoping process, the NPWS were contacted on the 4th of August 2020 in order to request ecology information. The NPWS provided data on rare and protected species within 20km of the proposed Croaghaun Wind Farm site. This included information on the Freshwater Pearl Mussel and a record of a Peregrine Falcon nest. Other habitats and species data was also provided by the NPWS. The information received by FT ecologists was used to inform site surveys and identify the potential for species which may not have been observed during site walkovers.



A formal request was sent to the DAU on the 18th of September 2020 to organise a meeting between FT ecologists and a representative of the NPWS regarding the proposed development. No response was received.

5.3.5 Carlow County Council Roads Department

A meeting took place in September 2020 between a Senior Engineer of FT and Carlow County Council Roads Department to discuss the traffic and transportation aspects of the proposed development in detail. This meeting followed email correspondence between the same parties during the Summer. During the meeting which took place in the Tullow Civic Offices, County Carlow, Mr. Harrington outlined his department's plans for future upgrading of the local road network and potential interactions with construction activities associated with the proposed development, in particular the grid connection works.

These considerations have been incorporated into the design and assessment of the project and are set out in Chapter 13: Traffic and Transport.

5.4 Community Consultation and Public Information Events

Coillte's engagement mission is to be consistently transparent, inclusive and committed to integrating community views into project plans. Community consultation for the Croaghaun Wind Farm began at an early stage with an aim for public inclusion throughout the development process of the project.

Community engagement was conducted by members of the development team, as well as the appointed Community Liaison Officer (CLO).

The CLO was responsible for communication between the public and the developer's team. The CLO's role included door to door consultation with community members, distribution of project materials to community members, follow up meetings with community members where requested, liaison between local residents and the project team, communication of any project updates and compilation of feedback.

5.4.1 Door to Door Community Engagement

Community engagement commenced in June 2018 with door to door calls to neighbouring properties within 1km of the project site ownership boundary. This was intended to provide initial information to locals and inform them of Coillte's, intention to develop a wind farm on the lands. This was followed by a revisit to the local community in September 2018 for feedback on the initial information and to inform the resident's that a meteorological mast would be erected on-site in the coming months. Generally, the initial response was supportive with appreciation being shown for early engagement.

A third round of door-to-door community engagement commenced in May 2019, led by the project CLO. This round of engagement aimed to contact the wider community including households located within 2km of the project boundary. The third round of door-to-door visits provided a project update to residents, highlighting key activities and timelines, and providing the latest project newsletter. An indicative project layout was presented to the community for feedback. The engagement cycle was outlined to the public and contact information was provided should there be any queries or information requests.



Further door-to-door engagement intended for 2020 in line with the production of the final Design Iteration of the project was curtailed as a result of national COVID 19 restrictions. Due to contact restrictions, the project team depended on alternative communicative means to inform the locality of project progress including a project update log featured on the project website which also included COVID-19 relevant information around engagement, and phone calls with members of the public requesting project information and updates.

A core issue raised by local residents was potential impact to landscape and visuals at the site. On foot of this concern, Coillte ran a LVIA workshop in October 2019 with the aim of presenting different design options to members of the public to gain feedback and provide an opportunity to influence the design process from a visual perspective. The LVIA workshop is further detailed in section 5.4.3.

5.4.2 Engagement with Local Groups

As well as community involvement, it is Coillte's ambition to work with local interest groups while developing the wind farm to enhance the area for both the community and tourism, in line with the Local Authority's request as set out in Section 5.3.1. Coillte, through ILC Consultants, engaged with numerous groups involved in recreation activities in the Croaghaun Area. The following recreation groups were contacted in relation to the Croaghaun Wind Farm project:

- Blackstairs Farming Group,
- Blackstairs Ramblers,
- Tullow Mountaineering Club,
- The Clody Loafers
- Irish Hang Gliding and Paragliding Association (IHPA)

These groups were contacted in order to determine potential impact on their interests and activities, to request input to the project and explore potential synergies between the proposed project and the groups' activities. ILC Consultants drew up a recreational plan for the Croaghaun Project with the involvement of the groups which included feedback and suggestions with the aim of producing an inclusive plan. IHPA also submitted a response to EIAR scoping and consultation is ongoing with Coillte since July 2018.

Coillte have been consulting with the IHPA and will continue to consult in order to seek to minimise potential impacts on hang gliding activities in the area. As part of ongoing engagement, Coillte have discussed the possibility of locating IHPA wind monitoring equipment on Croaghaun Wind Farm's permanent meteorological mast to allow IHPA to assess real time wind conditions prior to travelling to site. Please refer to Chapter 11 for details.

A Croaghaun Windfarm Recreation Development Plan has been produced by ILC consulting which includes the measures as set out in Section 11.6 of this EIAR. The Recreation Development Plan includes aspects for walking, cycling, heritage and interactive features, supported by parking, access and signage. The recreation facilities will be developed in line with consultation with local interest groups and the local community.

5.4.3 Community Information Event – LVIA Workshop - October 2019

A Landscape and Visual Impact Assessment (LVIA) workshop was held over three days on Thursday 24th to Saturday 26th October 2019 to provide an opportunity for the public to view the proposals for the Croaghaun Wind Farm. The workshop took place in Coillte's Nursery, Ballintemple, Ardattin.



The workshop was advertised to dwellings within 2km of the proposed project. The CLO contacted a representative from each household prior to door-to-door engagement where Project Newsletter No. 3 was distributed, and attendance of the workshop was encouraged. The event provided general project information, visual aids and maps including the following:

- Expected project timescale;
- Description of the development process;
- Description of the EIAR process;
- Need for the development;
- Project design information;
- Grid connection information;
- Turbine Delivery Route;
- Locations of European Sites;
- Locations of nearby residential receptors in relation to the project; and
- Photomontages

Furthermore, a summary of the EIAR scoping document was provided at the workshop in order for local individuals to give feedback to the EIAR process.

The workshop was focused on LVIA and presented two provisional turbine layouts (Design Iteration 1), including a 6 no. turbine layout and a 7 no. turbine layout option with different turbine tip heights and rotor diameters. These alternatives were illustrated in photomontages and the attendees were asked their opinions on each potential proposal from a visual impact perspective. Panopods were provided at the event which allow the attendee to view the proposed development as a panoramic 180° image, to provide greater visual aid. An interactive computer station was also provided at the event which allowed attendees to view the proposed turbines within a 3D google earth landscape. This proved to be an effective and popular visual aid for the attendees of the event.

A total of 42 individuals attended the workshop over the three days including those living within 2km of the proposed project and a small number of individuals living further than 2km from the project.

Feedback from the workshop included concerns regarding the visual impact of the project and potential impact from noise. Some individuals inquired about the community benefit fund. Individuals who requested further information were followed up with by email or phone call. A number of individuals voiced their opposition to the project during the workshop. Feedback was considered with respect to development of the final design of the project.

Further public events aimed at community engagement were scheduled for 2020 as further design iterations were produced, however, due to national COVID 19 restrictions, these events could not take place. Alternative means of public engagement were developed for the project including an online virtual exhibition where individuals could log on and view the presentation and provide feedback to the project team. This was supported by media presence to encourage attendance.



Plate 5-1: Screenshot of the Online Virtual Exhibition¹

5.4.4 Project Newsletters

A number of project newsletters were produced in line with new project design iterations in order to provide local residents and stakeholders with up to date project information. The newsletters include photographs, maps and photomontage images of the proposed wind farm. The newsletters include information on the following:

- Project Overview
- Project Status
- EIAR Process
- Noise Assessment
- LVIA
- Project Layout (Latest Design Iteration)
- Need for the Development
- Community Benefit
- Project Timeline
- COVID-19 update

The project newsletters were considered an essential communication tool for community engagement due to the restrictions in place for meeting members of the public due to the COVID-19 epidemic and requirement to maintain public safety. Contact information was included in the newsletters with an email address, website address and phone number provided, to allow anyone with queries or concerns to contact the project team. The newsletters were circulated to dwellings within 2km of the proposed wind farm site and made available on the project website. A total of four project newsletters were distributed to the public over the course of the development of the project. The project newsletters are included in Appendix 5.3 of Volume 3 of this EIAR.

¹ Online virtual exhibition available from the project website: www.croaghauwindfarm.ie



5.4.5 Project Website

A dedicated project website was established in July 2019 in order to provide accessible information to the public regarding the Croaghaun Wind Farm project. The information provided on the website includes project details, project timeline, latest project news, information on community engagement and community benefit, information on environmental protection and climate change and contact details in order for members of the public to get in touch with the project team.

The project news section aimed to provide up to date progress on the project and provided information on the previous and current stages of the project. The project news included information on the environmental impact assessment (EIA) process and up to date status on the progress of the EIA. The project news also provided up-to-date timelines for the upcoming project milestones including the submission date for planning. The EIAR scoping report was also made available to the public through the project website.

Due to the development of COVID 19 and the associated contact restrictions, the project website became more significant for communicating progress and changes to the project. A COVID 19 update was included on the project website to inform the public of the restrictions around community engagement and revised arrangements for communicating with the project team. This included the encouragement of phone call and email correspondence for project related enquiries.

An online virtual exhibition was made available on the project website in lieu of further workshops and community information events, as a result of COVID-19 restrictions. This included a range of project information and presentations provided by the project team.

The project website can be accessed at: <https://croaghaunwindfarm.ie/>

5.4.6 Community Engagement Summary

Table 5-3: Summary of Community and Stakeholder Consultation for the Croaghaun Wind Farm

Summary of community and stakeholder consultation for the Croaghaun Wind Farm		
2018	June	Door to door community consultation commenced
	September	Door to door community consultation revisit and Newsletter no. 1
2019	May/July	Door to door community consultation continued Newsletter no. 2 distributed
	October	Third round of door-to-door community consultation Newsletter no. 3 distributed with invitation to LVIA workshop Landscape and visual impact assessment public workshop
	December	EIAR Scoping document issued
2020	January/February	Ongoing community engagement with near neighbours
	March	Workshop with nearest neighbours postponed due to COVID-19 Public Health restrictions



Summary of community and stakeholder consultation for the Croaghau Wind Farm		
	March	EIAR Update – Information for the public on the EIAR process provided on the project website. Project status update also detailed on website
	May	EIAR Update – Updated information on the EIAR process provided on the project website
	June	EIAR Update – Updated information on the EIAR process provided on the project website
	November/ December	Final project brochure distributed to the local community and made available on the project website. Online virtual workshop provided for members of the local community on the project website. Project status update published in Carlow Nationalist and Carlow People newspapers.

5.4.7 Key Issues Raised During Community & Public Consultation

Coillte’s ambition to work with the community to address their concerns and to develop a project that will be a good fit for everyone resulted in a quality approach to public engagement. During the public consultation process many concerns were raised by the local community both during public meetings and during door to door calls. The Community Liaison Officer and project team were active in addressing all concerns the public had. This involved follow up meetings and call backs to specific households who requested further information.

Approximately 1.5 years of consultation with the community took place including door-to-door calls and a technical workshop between June 2018 and February 2020. Following the establishment of COVID-19 contact restriction measures in March 2020, the project team endeavoured to continue the public engagement process in line with the Code of Practice for Wind Energy Development in Ireland - Guidelines for Community Engagement as so far as possible.

Face-to-face meetings and public events were curtailed for the remainder of 2020 in line with Government Guidance, however, the development team provided detailed information to local residence where possible and allowed for queries and concerns to be channelled through emails and telephone calls in order to maintain public safety.

The following is a summary of the main issues and concerns that emerged during the public consultation process:

Visuals – One of the central concerns raised by individuals living in proximity to the project site was the potential visual impact of the project. Some members of the public had grown accustomed to seeing the Existing Greenoge Wind Farm however, others had concern that the cumulative visual impact of the two projects would be visually intrusive. A technical workshop on Landscape and Visual Impact Assessment was held in October 2019 presenting a number of different turbine layouts, sizes and rotor diameters. This was aimed at gauging the public’s opinion on the project and selecting a preferred option with respect to visual impact.



Further project information was also provided at this workshop. Feedback was sought from the attendees following the workshop by email and phone call; however, opinions regarding the various layout options were not concluded upon. The design of the project ultimately aimed to avoid visual impact as best as possible, in line with community concerns. A significant setback distance was applied from turbines to nearby dwellings, with the closest dwelling located approx. 980m from the nearest proposed turbine. This was in maintaining visual amenity for local residents.

Noise – A small number of Individuals mentioned they were dissatisfied with the noise from the existing Greenoge wind farm and concerns were raised regarding potential cumulative noise impacts due to the operational phase of the proposed Croaghaun Wind Farm. Members of the public were provided with information regarding noise impact assessment and information about the noise limits as set out in the Wind Energy Guidelines. The public were also assured that the project is being designed to be capable of meeting the Guidelines as these afford protection to nearby residents. The noise assessment is included in Chapter 7 – Noise & Vibration.

Health - Individuals raised concern about possible impact on human health from long term exposure to a wind farm. Concerned parties were informed of the scientific research conducted throughout the world including the UK, Central Europe, Australia and North America which indicates that there are no direct impacts on health as a result of living in proximity to wind farms. Furthermore, the compliance with the Wind Energy Guidelines will ensure sufficient setback distances between dwellings and turbines. A significant setback distance was applied from turbines to nearby dwellings, with the closest dwelling located approx. 980m from the nearest proposed turbine. This exceeds the requirements of the current and Draft 2019 Wind Energy Guidelines (500m and 712m respectively for residential amenity). The World Health Organisation’s Environmental Noise Guidelines informed the design of the project in order to protecting human health from potential exposure to environmental noise originating from proposed development.

Shadow Flicker - Members of the public were concerned that their residence would potentially be impacted by shadow flicker as a result of the proposed development. Although there is potential for Shadow Flicker to occur at dwellings in proximity to the proposed development, mitigation will be put in place to prevent shadow flicker occurring at nearby residences. This involves the temporary shutdown of individual turbines during periods of predicted shadow flicker. This mitigation measure is detailed in Chapter 12: Shadow Flicker.

Community Benefit Fund - Members of the public inquired about the community benefit fund associated with the project. Questions were raised about what type of offering would be made available and how it would be distributed throughout the community. Prior to the establishment of the initial Renewable Energy Support Scheme (RESS) Auction 1 in August 2020, details of the community benefit fund were not finalised; however, an indicative €2 per MW hour was set out in the RESS High Level Design report which was explained to members of the public. Following the initial RESS 1 Auction, a clearer picture was formed of what the potential Community Benefit Fund would consist of. This information was communicated to members of the public in the final project information circulated to the community prior to submission of the planning application. Further information regarding the community benefit fund is detailed in Chapter 11: Population, Human Health & Materiel Assets.

Grid Route – The underground grid route connection between the onsite substation and the Kellistown 110/220kV substation was designed to provide the most direct route possible to via the public road. This included a section of underground cabling traversing the town of Myshall, located directly north west of the proposed wind farm. Following consideration of potential impacts on residents of Myshall who would directly be impacted by the associated construction works in the town, an alternative route was chosen to avoid the town. The cable route as assessed in this EIAR will avoid the town of Myshall.



5.5 Conclusion

Consultation was sought from a number of stakeholders, including Carlow County Council, adjacent County Council's, Government Departments, Non-Governmental Organisations, telecommunications providers, aviation organisations, local community and recreation groups and local residents. Their comments and feedback were incorporated into the project design iterations and to the assessments conducted in the EIAR as identified in this chapter.

Pre-planning consultation was held with Carlow County Council to determine the key points and potential impacts of the proposed development and to inform the assessment methodology. Further detailed correspondence was received from Carlow County Council during the scoping exercise which informed various aspects of the EIAR assessment.

Public consultation was facilitated over two and a half years by having a dedicated Community Liaison Officer on the ground by way of door to door house calls and newsletter drops to ensure locals were made aware of the details of the project and processes involved. A dedicated phone line and email address were provided with circulated materials so members of the public could directly contact the project team. This process was commenced as early as possible in order to inform the design of the project and to inform the EIA process prior to its commencement. A dedicated website was also set up to allow for further open communication between the applicant and community throughout the iterative design process and run-up to the application submission.

Beyond the work of the Community Liaison Officer, public information events were organised to engage with the greater community and present detailed information.

A focused workshop was held over 3 days focusing on Landscape and Visual Impact Assessment to present different design options and encourage involvement in the design of the project. The LVIA workshop helped in communicating the potential visual impact of the proposed project as well as allowing the community to directly engage with the members of the project team on any project related concerns.

Further technical workshops planned for 2020 were subsequently cancelled due to COVID-19 public health restrictions. An online virtual workshop was organised prior to submission of the project, where individuals could log on and view a project presentation and provide feedback to the project team. This was supported by media presence to encourage attendance.

Observations and issues that arose during the scoping and consultation process have informed the design, assessment and mitigation measures proposed as part of this project as set out throughout this EIAR.



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