

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED CLOONKETT WIND FARM, CO. CLARE

Volume 2 - Main EIAR

Chapter 5 –EIA SCOPING AND CONSULTATION

Prepared for:

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5. EIA SCOPING AND CONSULTATION

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 Cloonkett Wind Farm project to be included in the EIAR. The consultation process carried out for the project has been a lengthy, detailed and thorough process. A number of points and submissions were raised as part of the consultation process which have informed the project design and this EIAR.

This chapter presents the key points that arose through the consultation process and how these points were addressed in the EIAR. The consultation process, scoping and the various pre-application consultation meetings (e.g. with An Coimisiún Pleanála, NPWS, EirGrid, Clare County Council) undertaken in respect of the proposed development are set out in this chapter. Following receipt of scoping responses, further consultation occurred with consultees as appropriate – for instance with the NPWS regarding surveying and bats and Eirgrid regarding the Grid Connection route.

Throughout 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 of 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 applicant 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.

Please refer to Chapter 4 – Policy for further discussion on this document, and the other legislation and guidelines considered throughout this Environmental Impact Assessment Report (EIAR).

5.1.1 Statement of Authority - Chapter Authors

This chapter has been drafted by Evan Rossiter, who is a Senior Project Planner with a BSc in City Planning and Environmental Policy and a Masters in Regional and Urban Planning (MRUP) from University College Dublin. Evan has prepared EIAR Chapters for a range of development types, including renewable energy developments, throughout Ireland.

This chapter has been reviewed by Jim Hughes. Jim holds a BA in Public Administration from the University of Limerick, an MSc in Town Planning from Queen's University Belfast and a Higher Diploma (H.Dip) in Environmental Impact Assessment from University College Dublin. Jim has led major Irish projects in the planning, environmental assessment and permitting disciplines including many wind farm developments.



5.2 Scoping and Pre-Planning Consultation

The purpose of the EIA scoping process is to identify the key points and issues which need to be considered 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 which comprises the construction of 14 no. wind turbines and 1 no. permanent onsite 220 kV electrical substation and associated compound to facilitate a grid connection via an overhead line (the Proposed Development is described in detail in Chapter 2 of this EIAR).

A scoping request letter and scoping report outlining a description of the proposed project, draft mapping, preliminary table of contents of the EIAR and an outline of the methodology for the assessment was distributed to consultees on the 11th of September 2023. The recipients, listed in full in Table 5-1 and included, the Council, 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.

Separate consultation was undertaken with telecom providers to determine that potential impact of the turbines on telecom and communication links. For more information on this please refer to Chapter 16: Material Assets, Telecommunications and Aviation.

A copy of the scoping request letter and scoping report are included in Appendix 5-1 of Volume 3 of this EIAR.

Table 5-1: List of Consultees to whom the Scoping Report was sent

Type of Stakeholder	Body / Department
The Council	Clare County Council
Regional Authorities	Southern Regional Assembly
Government Departments	Minister for Housing, Local Government and Heritage Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media Minister for Agriculture, Food and the Marine Minister for Communications, Climate Action and Environment Minister for Transport Minister for Defence
NGOs & Stakeholders	Inland Fisheries Ireland (IFI) Transport Infrastructure Ireland (TII) Environmental Protection Agency (EPA) The Heritage Council An Taisce An Chomhairle Ealaíon (Arts Council) Fáilte Ireland Uisce Éireann Commission for Regulation of Utilities (CRU) Office of Public Works



Type of Stakeholder	Body / Department
	Health Service Executive (HSE) Health and Safety Authority Geological Survey Ireland (GSI) Irish Wind Energy Association Irish Peatland Conservation Council Biodiversity Ireland Irish Wildlife Trust Butterfly Conservation Ireland Birdwatch Ireland National Parks and Wildlife Service (NPWS) Irish Environmental Network Teagasc Gas Networks Ireland (GNI) The Irish Meteorological Service (Met Éireann) Eirgrid ESB Networks Sustainable Energy Authority Ireland National Transport Authority Geographical Society of Ireland An Garda Síochána (Ennis Branch) Environmental Sciences Association of Ireland Forestry Services Angling Council of Ireland National Monuments Service Bat Conservation Ireland Critical (formerly Irish Community Rapid Response)
Aviation	Irish Aviation Authority Air Navigation Ireland Shannon Airport Authority Ireland West Airport (Knock) Irish Air Corps
Other – to inform	Commission for Communication Regulation



5.2.1 List of Scoping Responses

Full details of the scoping responses received are set out in Appendix 5.2. A summary of the consultation responses received are presented in Table 5-2.

Table 5-2: Summary of Scoping Responses Received

Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
Clare County Council Planning Department	22/11/2023	Points raised by the Council in relation to the preparation of the EIAR are summarised in Section 5.2.3, below. These points include: - Identifying potential impact on water quality (within and connected to the site), compiling information regarding the interactions of the development with surface water and ground water and identifying any impacts on sensitive receptors, within or downstream of the site. - Assessment of the noise and vibration impact of the proposed development, obtaining baseline readings at all noise-sensitive locations, and the assessment of the potential impact on sensitive receptors arising from the activities associated with the proposed borrow pit(s). - Full assessment of the proposed developments impacts on habitats within, surrounding and connected to the site. - That there should be consideration of permitted dwellings and other sensitive development that may not as yet be constructed during the preparation of the EIAR. - The visual impact of the windfarm is to be assessed with particular emphasis on views towards the site from the N68 (national road) to the north; local roads to the north, south, east and west south of the site, settlements in the area, historical or tourist related features in the area and potential views from designated scenic	This is considered throughout EIAR. In particular the following chapters address these items: Chapter 4: Population and Human Health; Chapter 8: Noise and Vibration; Chapter 9: Biodiversity; Chapter 11: Hydrology and Water Quality; Chapter 13: Traffic and Transport; Chapter 15: Landscape and Visual



Consultee	Date of Response	Response / Key Points Raised	Location in the EIA where Consultation feedback has been addressed
		routes (outlined in the <i>Clare County Development Plan 2023 – 2029</i>). • Intervisibility between the proposed development and existing/permitted wind farm developments from these views should also be assessed. • Photomontages are to be provided with the Application. • The cumulative impact of the proposed development and the current/permitted wind farms and other development in the wider area are to be assessed. • Details on the location and design of the proposed grid connection(s) are to be included and adequately addressed within the EIA. • A peat stability assessment and landslide susceptibility modelling are recommended on any areas within the site which has significant level changes – the model should show areas at risk of landslide based on peat depth, slope, altitude, aspect and curvature. • The EIA should include detail regarding the vulnerability of the project to major accidents and / or disasters that are relevant and the expected effects of same. • Inclusion of traffic management information relating to the proposed number, composition, routes etc. for traffic associated with the construction, operational and decommissioning phase(s) of the development within the EIA. • Full assessment of the potential for direct and indirect impacts on the cultural heritage assets of the area.	
Southern Regional Assembly	11/09/2023	Automated / acknowledgement of receipt of the scoping letter and report; no further response received	N/A



Consultee	Date of Response	Response / Key Points Raised	Location in the EIA where Consultation feedback has been addressed
Minister for Agriculture, Food, and the Marine	02/10/2023	This reply came from the Departments Felling Division. It outlined that if the proposed development involved the felling or removal of any trees, the developer must first obtain a Felling Licence prior to any trees being felled or removed. As the Site is located on forested lands, the reply referenced the Felling and Reforestation policy and the process of obtaining a valid Tree Felling Licence. It noted that particular attention should be paid to the policies pertaining to deforestation, turbulence felling and the requirement to afforest alternative lands.	Impact of tree felling is addressed throughout the EIA. The procedure for addressing replant lands is detailed in Chapter 1 Introduction, Chapter 4 Detailed Description of Development, and Chapter 9: Biodiversity. The procedure, including any requirement for licences, for addressing replant lands
Minister for Communications, Climate Action and Environment	None	No comment / response received	N/A
Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media	None	No comment / response received	N/A
Minister for Defence	20/12/2023	A comment from the Minister of defence was received, which stated the following was required: All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week.	Chapter 11 – Population, Human Health & Material Assets



Consultee	Date of Response	Response / Key Points Raised	Location in the EIA where Consultation feedback has been addressed
		Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light. Any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) requirements.	Chapter 16 – Material Assets, Telecommunications & Aviation
Minister for Housing, Local Government and Heritage (HLGH)	31/10/2023	A detailed response was received from the Minister for Housing, Local Government and Heritage. This reply included observations and recommendations by the Development Applications Unit (DAU) related to: • Archaeology – pertaining to planning and design. • Birds. • Assessment of potential impacts on the physical environment, landscape, and setting and amenity. • Nature conservation. • Ecological data and surveys. • Protected/sensitive habitats and species. • Bats. • Wetlands, watercourses, and hydrology. • Invasive species. • Transport and access. • Project components – such as the inclusion of a Construction Management Plan(s), Habitat Management Plan(s).	Considered throughout this EIA. In particular: Chapter 9: Biodiversity; Chapter 11: Hydrology and Water Quality; Chapter 13: Traffic and Transportation; Chapter 14: Archaeology; Architectural and Cultural Heritage; and Chapter 15: Landscape and Visual.



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
		Useful guideline and policy documents for consultation. This is further detailed in Section 5.2.3 below.	
National Parks and Wildlife Services (NPWS)	31/10/2023	A response from the National Parks and Wildlife Services (NPWS) was received as part of the above-mentioned submission by the Minister for Housing, Local Government and Heritage (DAU unit). The response from the NPWS included the suggestion of: - geophysics prior to lodging a planning application, - requested both day and night-time ornithology surveys, and requested - the demonstration the avoidance of a net loss of biodiversity habitat	Chapter 9 – Biodiversity and Chapter 14 – Archaeology, Architectural and Cultural Heritage
Bat Conservation Ireland	18/09/2023	The response received from Bat Conservation Ireland stated that the organization is very small, with limited resources, and as such does not have capacity to get involved in planning issues. A note stating: “Please note that Bat Conservation Ireland is concerned that a request for our input/consultation/opinion/assistance on planning applications and reports, or objections/comments on same, can sometimes imply that we have been consulted for our opinion on planning matters when Bat Conservation Ireland does not, in fact, provide opinions or comments on developments. Therefore, please note that this response should not be construed as a consultation with Bat Conservation Ireland regarding any planning or development matter or proposal. In order to avoid misunderstandings, please do not use this terminology in your reports to describe this transaction” was also present in the response.	N/A



Consultee	Date of Response	Response / Key Points Raised	Location in the EIA where Consultation feedback has been addressed
Inland Fisheries Ireland (IFI)	11/09/2023	Automated / acknowledgement response received	N/A
Geological Survey Ireland (GSI)	25/10/2023	A response was received from Geological Survey Ireland (GSI) which included some key resources and datasets relating to: geoheritage, groundwater, geological mapping, geohazards, natural resources, and various supplementary guidelines for consideration of the project design team.	Chapter 10 – Soils, Geology, and Hydrogeology
Office of Public Works	20/09/2023	The response from the Office of Public Works (OPW) detailed that a review of the submitted documentation was conducted by the South West Drainage Maintenance office; they advised that there were no comments to make.	N/A
Teagasc	None	No comment / response received	N/A
Environmental Protection Agency (EPA)	11/09/2023	Automated / acknowledgement of receipt of Scoping Report	N/A
Birdwatch Ireland	None	No comment / response received	N/A
The Irish Meteorological Service (Met Éireann)	11/09/2023	Automated / acknowledgement response received	N/A
Irish Peatland Conservation Council	None	No comment / response received	N/A
Biodiversity Ireland	12/09/2023	The response received from Biodiversity Ireland advised that the National Biodiversity Data Centre does not have the capacity to provide feedback on scoping projects.	N/A
Irish Wildlife Trust	12/09/2023	The response received from the Irish Wildlife Trust advised that they do not have the staff capacity to respond to the scoping request but will endeavour to respond if possible.	N/A



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
		No further response or correspondence was received	
Butterfly Conservation Ireland	23/11/2023	A detailed response was received from Butterfly Conservation Ireland. It outlined the following key points: • The organisation does not support any development that damages the habitat occupied or unoccupied, of the Marsh Fritillary. • The organisation does not support the translocation of larval nests and or habitat as a mitigation method for a species with specialised ecological requirements. As in their experience, translocations fail, some immediately, such as those that occurred during pre-construction work on the Ennis by-pass in 2004. • The habitat must retain current moisture levels and remain unshaded, open and managed to maintain the habitat (as described by Harding in the publication 'The Irish Butterfly Book. A complete Guide to the Butterflies of Ireland', privately published in Maynooth and also the NBDC form for Habitat Condition Assessment for Marsh Fritillary).	Chapter 9 - Biodiversity
Irish Environmental Network	None	No comment / response received	N/A
The Heritage Council	None	No comment / response received	N/A
An Taisce	None	No comment / response received	N/A
National Monuments Service	31/10/2023	A response from the National Monuments Service was received as part of the submission by the Minister for Housing, Local Government and Heritage (DAU unit) (outlined above).	Chapter 14 – Archaeology, Architectural Cultural Heritage and Chapter 15 Landscape and Visual



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
		The National Monuments Service recommended that an Archaeological Impact Assessment (AIA) should be carried out at an early stage of the planning and design process, with the various requirements of the AIA outlined thereafter. Items related to the assessment of the potential physical, landscape, setting, and amenity impacts of the proposed development were also outlined. These comments are addressed in Section 5.2.3 of this document.	
An Chomhairle Ealaíon (Arts Council)	None	No comment / response received	N/A
Fáilte Ireland	17/10/2023	This reply included a copy of their document entitled '<i>EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects</i>'. The guidelines are for information purposes for those involved in the preparation of an EIAR or those assessing EIAR related projects which involves tourism or may have an impact upon tourism. These guidelines are considered non-statutory and act as supplementary advice to various EPA EIAR Guidelines.	Considered in Chapter 6 Population and Human Health and, Chapter 15 Landscape and Visual.
Minister for Transport	25/10/2023	A detailed response was received from the Minister for Transport. This reply outlined the following recommendations and observations: The Department considers the construction involved in achieving the proposed development, especially the connection cables to the national grid network, may have effects on both the environment and Regional and Local Road networks.	Chapter 13 – Traffic and Transport Chapter 3 – Site Selection and Alternatives.



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
		- Requests that, where the Applicant proposes the placement of any cables (or additional cables) in one or more trenches within the extent of the (regional and local) public road network, the following items are considered: - The presence of cables in public roads could significantly restrict the Road Authority in the carrying out of its function, as such it is requested that any restriction of the Road Authority in carrying out its function and any additional costs accrued due to the presence of cable in the public road need to be considered. - Any impact on the stability of the road (particularly on roadways deemed to be 'legacy roads'). - Impact on remaining available roadspace (with emphasis on the need for such spaces to potentially accommodate other utilities within the road cross-section in the future). - The necessity to have the power in the cables switched off where the Road Authority considers it necessary in order to carry out its function to construct and maintain the public road. It also outlines multiple items which should be considered in relation to the examination of the proposal and conditions should the proposed development obtain a grant of planning permission / approval.	It is important to note since the issuing of the original scoping letter, the grid connection method was updated, removing the requirements for cables on the public road.



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
Transport Infrastructure Ireland (TII)	29/09/2023	A detailed response was received from Transport Infrastructure Ireland. It outlined general guidance and suggestions for consideration during the preparation of the EIAR. These included: • Consultations with the relevant Local Authorities in relation to the locations of existing and future road schemes. • Identification of potential impacts on the national road network in the proximity of the development (including in relation to potential haul route(s)). • Assessment of visual impacts from existing roads. • Having regard to an TII publications or guidelines. • Consideration of the Environmental Noise Regulations 2006 and how the development will impact any future plans by the relevant competent authority. • Consideration of the need for the implementation of noise barriers (in line with the Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (1st Rev., NRA, 2004). • The carrying out a Traffic and Transport Assessment (TTA) and consultation with TII Publications to determine if a Road Safety Audit is needed. • Identification of methods and/or techniques proposed for any works traversing or in proximity to the national road network. • Identification of the proposed haul routes and providing detail regarding same • Establishing any potential cumulative impacts.	Chapter 3 – Site Selection and Alternatives Chapter 6. Population & Human Health Chapter 8. Noise & Vibration Chapter 13 – Traffic and Transport Chapter 15: Landscape and Visual.



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
		Having regard to any EIAR/EIS assessments and any conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the locality. Further information and guidance relating to the potential grid connection route (including specific details of ducting, depth, etc.), haulage route (and its ability to accommodate abnormal weight and/or length cargo), and directional drilling under roads was provided.	
National Transport Authority	23/11/2023	Automated / acknowledgement response received	N/A
Eirgrid	11/09/2023	An automated / acknowledgement response was received saying that the scoping had been passed onto the 'appropriate business area'. However, no further response was received	N/A
ESB Networks	18/09/2023	The response received from ESB Networks outlined that they do not provide feedback on EIA scoping reports. However, attention is drawn to the ESB capacity heat map which contains capacity information on all the 3-phase LV, MV, and HV DSO substations. Furthermore, reference is drawn to the Generation Minimum Cost Calculator which provides an estimation of the minimum costs associated with generator connections to the distribution system operator (DSO) network >200kV.	N/A
Uisce Éireann	18/09/2023	The response from Uisce Éireann advised that at present they do not have the capacity to advise on scoping of individual project. However, a set of general principles/considerations for EIAR assessment on Water Services was provided as part of the response.	Chapter 10 – Soils, Geology, and Hydrogeology



Consultee	Date of Response	Response / Key Points Raised	Location in the EIAR where Consultation feedback has been addressed
			Chapter 11 – Hydrology and Water (and associated appendices including, <i>inter alia</i> , the <i>Construction and Environmental Management Plan</i> and <i>Surface Water Management Plan</i>).
Commission for Regulation of Utilities	23/11/2023	Automated / acknowledgement response	N/A
Commission for Communications Regulation	11/09/2023	Automated / acknowledgement response received	N/A
Gas Networks Ireland	15/09/2023	The response received from Gas Networks Ireland (GNI) advised that the proposed development does not impact on the GNI network given current cable route. A recommendation for the contractor to use the ‘Dial Before you Dig’ system was included to ensure that the required response is received in a timely manner. It is outlined that the online system can give immediate mapping of an area, once an account is registered and activated.	N/A
Heath Service Executive	None	No comment / response received	N/A
Health and Safety Authority	11/09/2023	Automated / acknowledgement response received	N/A
Irish Wind Energy Association	None	No comment / response received	N/A
Sustainable Energy Authority of Ireland	None	No comment / response received	N/A



Consultee	Date of Response	Response / Key Points Raised	Location in the EIA where Consultation feedback has been addressed
Geographical Society of Ireland	None	No comment / response received	N/A
An Garda Siochána (Ennis Branch)	29/11/2023	The response received from An Gard Siochána (Ennis Branch) outlined a concern related to the route access to the proposed site and the impact that Heavy Goods Vehicles (HGV's) delivering materials (gravel etc.) to the site will have on the current traffic volumes in the surrounding rural area(s).	Chapter 13 – Traffic and Transportation
Environmental Sciences Association of Ireland	2/10/2023	The response received from Environmental Sciences Association of Ireland stated that the request falls outside their remit and they are therefore unable to engage with the EIA Scoping Process	N/A
Forestry Services	None	No comment / response received	N/A
Angling Council of Ireland	None	No comment / response received	N/A
Critical (formerly Irish Community Rapid Response)	None	No comment / response received	N/A
Irish Aviation Authority	11/09/2023	Automated / acknowledgement response received	N/A
Air Navigation Ireland	None	No comment / response received	N/A
Shannon Airport Authority	None	No comment / response received	N/A
Ireland West Airport (Knock)	11/09/2023	Automated / acknowledgement response received	N/A
Irish Air Corps	None	No comment / response received	N/A



5.2.2 Key Issues Raised During the Scoping Process

The scoping process proved beneficial to the identification of issues and potential issues in relation to the proposed Cloonkett Wind Farm project. Responses received from consultees identified a range of observations and potential site constraints which were been taken into consideration during the iterative design process and assessed in the respective chapters of this EIAR.

A number of the most pertinent Issues raised during the scoping process are summarised and discussed in depth below. A copy of all the scoping responses received are included in Appendix 5.1 of Volume 3 of this EIAR:

1. Clare County Council Planning

Clare County Council, provided two documented responses to the EIA Scoping Report that was issued in September 2023, as follows:

1. 21nd November 2023, correspondence received from the Staff Officer, Clare County Council Planning Department (Ref. Scope 2023-3) provided feedback on some potential issues for consideration in the EIAR, in addition to those set out in the EIA Scoping Report.
2. 24th November 2023, further correspondence was received in the form of a Pre-Planning Report (Ref: PPI-23-150) with site-specific observations from a Senior Executive Planner of Clare County Council and stated: *this report should be read in conjunction with EIA scoping report reference Scope 2023-3 as previously issued by the Planning Authority.*

The scoping responses received from Clare County Council outlined that information in the EIAR is required to comply with Section 171A of the *Planning and Development Act 2000 (as amended)* and further outlines the process required in preparing an EIAR. Furthermore, they stated that the information specified in the Environmental Impact Assessment Report should comply with Paragraph 1 of Schedule 6 of the *Planning and Development Regulations 2001 (as amended)*.

1. **Clare County Council Planning Department (Ref. P22-125)**

In this correspondence, dated 21 November 2023) the Planning Department of Clare County Council (Clare County Council Ref. Scope 2023-3) provided feedback on the Scoping Report issued in September 2023 and outlined that the following be considered in the preparation of the EIAR:

- Impact on water quality both within the site and its wider environs, given the sites location within a designated Freshwater Pearl Catchment Area, proximity to the Cloon River (Lower River Shannon Special Area of Conservation) which flows into Clonderalaw Bay (Lower River Shannon SAC, River Shannon and River Fergus Estuaries SPA and Clonderalaw Bay pNHA), and potential hydrological connectivity to Gortglass Lough pNHA and Cloonsnaghta pNHA.
- Impact on downstream receptors are to be identified – and information pertaining to the interactions between the development, surface water, and groundwater at all stages are to be considered.
- Acoustics and vibration should be considered in relation to the noise and vibration arising from the proposed development.
- Baseline readings at all noise-sensitive locations should be obtained – with the noise reports also providing assessment of the potential impacts on sensitive receptors arising from the activities associated with the proposed borrow pit(s).



- Impact of the proposed development on habitats and sensitive species within, surrounding and/or connected to the site.
- Account for any permitted dwellings and other sensitive development which may not as yet be constructed in the assessment of noise sensitive receptors.
- Assessment of the visual impact of the proposed development – with specific emphasis on views towards the site from the N68 national road to the north, and the local roads to the north, south, east and west located to the south of the site, historical or tourist related features, and from potential views from designated scenic routes (as per the *Clare County Development Plan 2023 – 2029*).
- Intervisibility between the proposed wind farm and existing/permited wind farm developments from these views should also form part of any visual assessments.
- Cumulative Impacts of the proposed development
- Details regarding the location and design of the proposed grid connection(s) – the Council noted that the site is significantly removed from the proposed grid connection at Moneypoint
- Assessment of the ground conditions, including landslide susceptibility modelling and peat stability assessment.
- Expected effects from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the project.
- Traffic management information. Especially information pertaining to the proposed number, composition routes, etc. for traffic associated with the construction, operational and decommissioning phase(s) of the development.
- Assessment of the potential direct and indirect impacts on the cultural heritage assets of the area.

2. Planning Report (Ref: PPI-23-150):

Following the correspondence from Clare County Council received on 22nd of November 2023, further communication was received on 24th November 2023 from the Planning Department. In this Pre-Planning Report (Clare CoCo Ref: PPI-23-150) dated 24th November 2023, it requested the following to also be considered in the preparation of the EIAR::

- Outline of the current Wind Energy Strategy (WES) with specific attention drawn to Annex A which outlines general guidance for WF applications.
- A note relating to turbine heights was issued, with the Council stating that based on information presented in the submitted documentation (the development would involve the installation of 17 No. 4.5 MW wind turbines with an estimated output in excess of 50 MW) and publicly available information pertaining to wind turbines at the time of issuing the feedback, that the turbines heights would be significantly greater than the heights assumed by the Council in designating this area for wind farms. However, it was also noted that the WES recognises that turbine heights are increasing and there is no prescription in relation to turbine heights with each application being assessed based on its own merits against the planning policies, objectives and relevant legislation.
- Visual impact is raised as a key planning issue. Specific reference was drawn to the cumulative impact of the proposed development in combination with the existing and permitted wind farms in the local area. The Council states that this impact would be expected to be significant, with the landscape and visual impacts greatly increasing as further encroachment of the south of the N68 occurs.



- Serious concerns relating to the potential for adverse impacts on visual amenities of the area and the character of the '*settled landscape*' were raised.
- Views from the Shannon Estuary are also raised as a concern and it is requested that these be assessed as part of the EIAR and/or application documentation.
- The site is located within a designated freshwater pearl mussel catchment area and this was raised as a key planning issue. In particular, given that the development will require extensive groundwork and the sites proximity to the Cloon River, the Council notes that significant mitigation measures would be required at construction stage to ensure the protection of receiving waters.
- Concern was expressed about potential impacts on ongoing groundwater and surface water regimes in the area post construction.

Response to Clare County Council Planning Recommendations

The detailed consultation feedback received from the Council was taken on board and used to inform the design of the Proposed Development. The above-mentioned key issues and any items raised in these scoping responses are addressed throughout this EIAR, with each relevant chapter providing extensive detail on these matters. In particular, the issues raised regarding freshwater pear mussel are addressed in Chapter 9: Biodiversity and issues raised regarding surface water are addressed in Chapter 11: Hydrology and Water Quality. Chapter 15: Landscape and Visual addresses the impacts on the visual environment and surrounding landscape.

Furthermore, detailed surveying effort (which is detailed and informs discussion throughout this EIAR) has taken place as part of this Project which was subsequently used to inform proposed mitigation measures

2. Department of Housing, Local Government and Heritage

The scoping response received from the Department of Housing, Local Government and Heritage encompassed commentary from the National Parks and Wildlife Services (NPWS) and National Monuments Service.

The Department of Housing, Local Government and Heritage, in its response dated 31 October 2023 received from the Development Applications Unit (DAU), advises that the following be considered in the preparation of the EIAR:

- Recommendation for the inclusion of an Archaeological Impact Assessment (AIA). It is recommended that this be conducted at an early stage of the planning and design process, with the findings influencing the later designs of the process.
- Assessment of potential for impacts on the physical environment, landscape, setting and amenity.
- Bird surveys, including data for all species covering usage to facilitate the assessment of potential collision risk, habitat loss, barrier effect and displacement. Such survey work should cover year-round site use and cover a minimum of a two-year period to allow for an accurate determination regarding site usage to be made.

It is important that these surveys and subsequent assessment(s) cover: cumulative impacts on birds from the surrounding sites; bird migration routes (day and night); flight lines of bird species between roosting and feeding areas (day and night); and any limitations in guidance documentation used in the analysis and discussion of the survey results.



- It is identified that the West Clare Uplands are known to be an important area for the Hen Harrier (a Birds Directive Annex 1 Species) and the site is located within an 'Important Bird Area' for this species. The EIA should provide: knowledge of Hen Harrier distribution and activity to determine the risks to the species as a result of habitat loss, displacement and collision risks (both for the proposed Wind Farm, other wind farms development, afforestation, and land reclamation in the general area) and knowledge of Hen Harrier nesting and foraging habitat availability.

It must be sufficiently demonstrated that there will be sufficient habitat for the Hen Harrier population in the event that all permitted windfarms are constructed and as conifer plantations mature and undergo successive rotations.

- Impact on Freshwater Pearl Mussel. The site is located within the Cloon Freshwater Pearl Mussel catchment area and is a qualifying interest of the Lower River Shannon SAC.
- Impact of the proposed development on Bats (both potential roosts and species). Guidelines for the surveying of species is also outlined.
- Detailed assessment of the hydrological impacts of the proposed development on wetlands and watercourses.
- A 10 metre riparian buffer on both banks of a waterway must be maintained.
- Hydrological assessment(s) (including a detailed site drainage map) should be carried out pertaining to the proposed developments potential impact on Natura 2000 sites and other sites including, inter alia, NHA's and pNHA's which it has direct hydrological links to.
- Peat stability testing
- Assessment of the peatland habitats surrounding the site, careful consideration regarding the removal of same and a detailed plan for the safe storage, disposal and rehabilitation of excavated or disturbed peat should form part of the report
- Marsh fritillary surveys should be carried out as per the standard Marsh Fritillary Larval Web Survey methodology.
- Detail regarding the length or amount of hedgerow/scrub to be removed and planting of a suitable native species in areas where this occurs.
- Invasive species management – and detail about the methods required to ensure that they are not accidentally introduced during the survey and/or construction phases.
- Tree felling and the future use and management of all these cleared areas should be specified. The impacts on wildlife, habitats and surface waters should also be assessed.
- Any associated improvement and/or reinforcement works required for access and transport along the proposed haul route(s).



- The route and impact of the proposed cable routes – if the applicant is in a position to specify same at the time of the application.
- All potential cumulative, in-combination and ex situ impacts.
- A Construction Management Plan and Habitat Management Plan need to be provided in order to facilitate an adequate EIAR being undertaken. Further guidance pertaining to the preparation of both documents are outlined thereafter.
- The response received also included detailed guidance and technical detail on the information which should form part of the relevant EIAR chapters.

Response to the Department of Housing, Local Government and Heritage

The below bullet points outline how the comments from this Department are accounted for and addressed in this EIAR:

- Comments on archaeology and heritage are considered in Chapter 14 – Archaeology, Architectural and Cultural Heritage (SUB). The requested documentation was prepared as part of the documentation submitted as part of this Application for planning permission. In addition, any features identified during this assessment were given due consideration in the design of the proposed development.
- Comments on floodplains, water courses, hydrology and wetlands are considered in Chapter 10 – Soils, Geology and Hydrology and Chapter 11 – Hydrology and Water Quality. Extensive consideration was given to the above-mentioned chapters. The items raised in this scoping response were addressed through surveying and the preparation of detailed reports and documentation to facilitate the competent authority in conducting a thorough assessment. A set of appropriate mitigation measures have been proposed for any impacts identified.
- Comments on various flora and fauna habitats and species are considered in Chapter 9 – Biodiversity. This included the conducting of surveys on, inter alia, Freshwater Pearl Mussels and Lesser Horseshoe Bats and conducting eDNA surveys in the waterbodies located in proximity of the site. Further follow-up engagement with the relevant consultee(s) to obtain feedback on the surveying and requirements for further analysis was also conducted to address the items raised in this observation. (Please refer to EIAR Volume II, Chapter 9 Biodiversity and the accompanying appendices in EIAR Volume III which provide details on surveying efforts etc.)
- Comments on traffic, transport, and Construction Management Plans are considered in Chapter 13 – Traffic and Transportation. Further detail and documentation regarding traffic and transport related items forms part of this Application. It is important to note since the issuing of the original scoping letter, the grid connection method was updated, removing the requirements for cables on the public road.
- Comments on project components are considered throughout the EIAR, as appropriate. The requested surveying, reports and documentation have been conducted as appropriate and form part of the documentation submitted as part of this Application for planning permission.



3. Department of Agriculture, Food and the Marine

The scoping response received from the Department's Felling Division states that, in the event of the felling or removal of trees the developer must obtain a Felling Licence from this Department. With this in mind, attention is drawn to the Departments Felling and Reforestation Policy document for information on legal and regulatory frameworks. As the site is located within forested lands particular attention was drawn to the requirements pertaining to deforestation, turbulence felling and the afforestation of alternative lands detailed in the aforementioned document.

The Departments assessment criteria for felling licences and recommendations relating to the EIA and NIS procedures are outlined thereafter.

Response to the Department of Agriculture, Food and the Marine Comments

Potential impacts on the receiving environment from the felling and replanting of trees as part of the proposed project is considered throughout the EIAR. Chapter 9 – Biodiversity has considered the potential impact of tree felling throughout the wind farm site and proposed the requisite best practice mitigation measures (e.g no felling of trees to occur during the breeding season etc.). These best practice mitigation measures are being implemented to avoid the deliberate killing or disturbance of birds.

Chapter 6 – Population, Human Health, and Material Assets addresses any potential impact of the change of land use of the proposed development with respect to forestry and also considers the potential impact of the removal of forestry as a material asset.

4. Minister for Defence

The scoping response received from the Department of Defence states that: *"all turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or, if LED or other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light"*.

Response to Minister of Defence

Chapter 16 – Material Assets, Telecommunications and Aviation has been compiled in light of the comments received from the Minister of Defence.

5. Department of Transport

The scoping response received from the Department of Transport outlined observations/recommendations for the preparation of the EIAR. The response stated, *inter alia*, the following:

- The Department of Transport considers that the construction involved in providing the proposed development, especially the connection cables to the national grid, may have effects on the environment, and the regional and local road networks.



- The response states that it is necessary, and thus requests, the assessment of the following where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network:
 - Restriction and/or increased costs for the Road Authority. The presence of cables within the public road could significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works.
 - Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure, and the subgrade may be poor or poorly drained) the design needs to take account of all the variable conditions and not be based on a sample of the general conditions.
 - The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future).
 - The necessity to have the power in the cables switched off where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road.
- The Department also outlined general guidance that should be considered when assessing the proposed development, and in the case of a grant of planning permission outlines a set of conditions which should be applied.

Response to Department of Transport

It is important to note since the issuing of the original scoping request in 2023, the method of connection to the national grid as evolved. There will be no requirement to install grid connection cabling on the public road for this project as the project proposes an on-site loop-in and loop out connection. Please refer to Chapter 3, Site Selection and Alternatives which details the evolution of the design.

6. Transport Infrastructure Ireland (TII)

In their scoping response, TII set out general recommendations for the preparation of an EIAR where the National Road Network may be affected. The response outlines the following:

- Consultations should be held with the relevant Local Authority/National Roads Design Office, with regard to locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.
- The developer should assess the visual impacts from existing national roads
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. 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).
- 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 (NRA), 2006).



- The EIAR/EIS 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., NRA, 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 (TTA) 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. In relation to national roads, TII'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 TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. It is noted that Section 2.4 of the EIAR Scoping Report advises that the turbine delivery route will begin at Foynes Port and travel along the N69, N18, M18 and the N85 to Ennis, and from that point will follow the most appropriate route, which will be determined pending a detailed engineer's assessment.
- In relation to the proposed haul route, where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.
- The applicant/developer should also consult with all PPP Companies, MMarC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded.
- It is noted that the grid connection to Moneypoint is proposed in the EIAR Scoping Report though no grid connection route is identified. Please note, any grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing, where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.



Response to TII Recommendations

It is important to note since the issuing of the original scoping request in 2023, the method of connection to the national grid has evolved. There will be no requirement to install grid connection cabling on the public road for this project as the project proposes an on-site loop-in and loop out connection. Please refer to Chapter 3, Site Selection and Alternatives which details the evolution of the design. Chapter 13 – Traffic and Transportation was compiled in light of TII observations and recommendations. TII guidelines were used where relevant in assessing construction stage impacts and operational stage impacts.

7. Fáilte Ireland

In their response to the scoping request, Fáilte Ireland recommended referring to their document “*EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects*”. Fáilte Ireland’s Guidance set out the guiding principles and the requirements of an EIAR including guidance on impact assessments to include quality, significance, extent, probability, type and duration of the effect, in line with draft EPA Guidance (2017).

Response to Fáilte Ireland Recommendations:

This document has been considered, as recommended by Fáilte Ireland. Chapter 11: Population, Human Health and Chapter 16: Material Assets, Telecommunications and Aviation 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. Furthermore, the updated EPA Guidance (2022) has also been considered on the information to be contained in an EIAR.

8. Uisce Éireann

Uisce Éireann advised that they do not have the capacity to advise on scoping of individual projects. However, they provided a document which outlines general guidance to be considered during the EIAR process where relevant:

- a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann’s Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant’s site and receiving waters should be identified as part of the report.
- b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.
- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.



- e) Impacts of the development on the capacity of water services (i.e. do existing water services have the capacity to cater for the new development). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water)

Response to Uisce Éireanns Comments:

Chapter 11 – Hydrology and Water Quality has been compiled in light of the comments made from Uisce Éireann on water quality.

Furthermore, Chapter 9 – Biodiversity and the accompanying Natura Impact Statement (NIS) discuss at length the Proposed Development and its interaction with protected areas (SPA, SAC, NHA, and pNHA), sensitive habitats and species.



9. An Garda Siochána (Ennis Branch)

In their scoping response, An Garda Siochána (Ennis Branch) outlined concern pertaining to the route access to the proposed site and the impact that Heavy Good Vehicle's (HGV's) delivering materials (gravel etc.) will have on the current volume of traffic in the rural areas surrounding the site.

Response to An Garda Siochána (Ennis Branch)

Chapter 13 – Traffic and Transportation has been compiled in light of the comments made from An Garda Siochána (Ennis Branch) and provides further clarification.

10. ESB Networks

In their scoping response, ESB networks advised that they do not provide feedback on individual EIA scoping reports. However, attention was drawn to the ESB capacity heat map which contains capacity information on all the 3-phase LV, MV and HV DSO substations and the Generation Minimum Cost Calculator which provides an estimation of the minimum costs associated with generator connections to the distribution system operator (DSO) network >200kV.

Response to ESB Networks

Chapter 16 – Material Assets, Telecommunications and Aviation has referred to the outlined materials as appropriate.

11. Butterfly Conservation Ireland

In their scoping response, Butterfly Conservation Ireland outlined that:

- The organisation is concerned about any development that can impact *Lepidoptera*, especially the Marsh Fritillary *Euphydryas Aurinia* protected under Annex I of the EU Habitats Directive 1992 and request that the current national status of the species be considered.
- Despite this increased attention, the number of 10km squares in which the Marsh Fritillary was recorded (one individual of any life stage constitutes a record), declined. In the period before 2010, it was recorded in 355 10 km squares compared with 352 10 km squares occupied from 2010 to 2021.
- The organisation does not support any development that damages the habitat occupied or unoccupied, of the Marsh Fritillary.
- The organisation does not support the translocation of larval nests and or habitat as a mitigation method for a species with specialised ecological requirements. As in their experience, translocations fail, some immediately, such as those that occurred during pre-construction work on the Ennis bypass in 2004.
- It is of important to note that the habitat must retain current moisture levels and remain unshaded, open and managed to maintain the habitat (as described by Harding in the publication '*The Irish Butterfly Book. A complete Guide to the Butterflies of Ireland*', privately published in Maynooth and also the NBDC form for Habitat Condition Assessment for Marsh Fritillary).
- Although the land on which the proposed development is undesignated, the Marsh Fritillary remains a key ecological receptor which must be protected from impacts. The best protection is avoidance of impacts.



Response to Butterfly Conservation Ireland

Chapter 9 – Biodiversity has been compiled in light of the comments made by Butterfly Conservation Ireland.

5.2.3 Follow-up engagement with Stakeholders

Following receipt of responses to the Scoping Letter issued on 11 September 2023, the project team continued with ongoing engagement with key stakeholders, including on-site meetings, email, online meetings (Zoom/ MS Team) and interim reports/updates. A summary of these additional consultations is provided in Table 5.3.

Table 5-3: Summary of additional, follow-up consultation and engagement with key Stakeholders following receipt of response to the Scoping Letter issued on 11th September 2023.

Consultee	Date	Detail of Engagement
Inland Fisheries Ireland (IFI)	2023	An eDNA survey was carried out in 2023 to determine the distribution of bony fish in the Cloon River catchment area. Following communication with IFI staff, a report on this survey was issued to IFI to confirm that no further survey effort was needed. No further feedback was received.
National Parks and Wildlife Service (NPWS)	Jul 2023 – Nov 2024	Following completion of freshwater pearl mussel Stage 1 and Stage 2 surveys in the Cloon catchment area in 2022 – 2023, a draft survey report was prepared for the NPWS, and a meeting was held with NPWS staff in October 2023 to discuss same. The outcome of this meeting was that the NPWS confirmed that the survey effort was acceptable to understand the current population and distribution with no gaps that required further survey effort. Furthermore, regular contact was maintained with the NPWS who were consulted by email, telephone and in-person in relation to the Burrenfadda Lesser Horseshoe Bat Roost. An NPWS Ranger attended one roost survey in the summer of 2023. In 2024, the NPWS conducted a further site visit to the roost during the summer months. The Department of Housing, Local Government and Heritage were informed of the results of each survey and consulted in advance of all conservation works that were carried out to the roost. Please refer to Chapter 9 – Biodiversity which provides detailed discussion and commentary on the above mentioned interactions.



5.3 Consultation with Key Stakeholders

5.3.1 Pre-Planning Meeting with Clare County Council

A pre-planning meeting took place with Clare County Council on 25th June 2025 between Clare County Council, Cloonkett Green Energy Ltd., and Fehily Timoney and Company. The key points from that meeting included:

- Proposal located along the catchment of the Clondrinagh River which flows into the Cloon River which is designated as part of the Lower River Shannon SAC for the presence of the Freshwater Pearl Mussel.
- This is one the 27 SACs for the species in Ireland and is currently at unfavourable conservation status. The Draft Cloon Sub-Basin Management Plan identified this upper reaches of the catchment as predominately peat substrate which pose a significant risk in terms of future development and in particular wind farm developments which require the excavation of considerable depths of soil.
- The Freshwater Pearl Mussel Regulations 2009¹ require that there are no artificially elevated levels of siltation present at the pearl mussel habitat. Given the location of the proposal which is located upstream of the known pearl mussel records and habitats, careful consideration as to the appropriateness of the application in this location in the context of the pearl mussel regulations, the sub-basin management plan and the recently published “Guidance on assessment and construction management in *Margaritifera* catchments in Ireland”² should be undertaken.
- Freshwater pearl mussel are extremely sensitive to changes within the catchment and therefore maintaining the equilibrium of the habitat (especially in the upper reaches of the catchment) with stable substrate, high velocity, and low levels of fine sediment and nutrients is essential and relies on sustaining a natural hydrological regime through the catchment. Demonstrating this ability will be key to any future application.
- Route identification – bridges/culverts to be surveyed beforehand
 - L-6180 is narrow in parts
 - Concrete trucks will still be required
 - Not going underground with cables is positive
 - If underground new Circular/Guidance on grid connections
 - Any roads to be reinstated as currently exist.
- Site is designated as ‘acceptable in principle’ in the Development Plan.
- Noted that the Wind Energy Strategy has been in place for sometime however not be changed until the Wind farm Guidelines have been published.
- Noted also however the Climate targets at national and EU level.
- Application will be made directly to ACP as an SID application – meeting with ACP to occur shortly.

¹S.I. No. 296/2009 - The European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009

² Margaritifera-Guidance_Ireland_Final-1.pdf



- Some concerns re proliferation of windfarms in West Clare and adhoc development of turbines in the wider area.
- Visual impact – some concern re views from the estuary. Noted that windfarms presently located to the north of the N68 – proposal would be to the south of the N68
- Concerns also in terms of proliferation of windfarms and relevant Development Plan policies in respect of protecting amenities.
- Noted that 25 landholders involved.
- Cumulative impact of the development needs to be considered in particular in terms of the visual impact and existing/permitted windfarms.
- Importance of public consultation
- Application, if SID, will be made directly to ACP and the Council will provide a report to the Commission as part of any such process.

Applicants Response

The Applicant acknowledges the comments of Clare County Council planning department and has taken onboard all feedback, and incorporated it into the final design presented in this Application. The final design of the Proposed Development has been prepared on foot of extensive public consultation (please refer to Section 5.4 below) and detailed survey effort conducted by the project design team with input from multiple specialists (please refer to Appendix 1.1). From the outset a rationale of mitigation by avoidance, whereby areas of sensitivity have been entirely avoided in so far as possible (please refer to EIAR Volume II, Chapter 3 – Site Selection and Alternatives and Chapter 9 – Biodiversity for further information).

5.3.1.1 Interaction with Clare County Council Roads Department

A pre-planning meeting took place with Roads Department of Clare County Council on 29th April 2025 between Clare County Council Roads Department, Cloonkett Green Energy Ltd., and Fehily Timoney and Company. The purpose of the consultation meeting was to deliver a presentation of the proposed haul routes, the turbine delivery route, road upgrades, and construction entrances to the Area Engineer for comment and feedback.

Whilst no formal meeting minutes were issued, any recommendations received from the road department were implemented into the design and application in advance of the submission.

5.3.2 Pre-planning consultation with An Coimisiún Pleanála

Three pre-application meetings were held with An Coimisiún Pleanála (formerly An Bord Pleanála) under Section 37B of the Planning and Development Act 2000 as amended. These meetings were conducted on the following dates:

- First Meeting: 5th October 2023
- Second Meeting: 4th March 2025



- Third Meeting: 17th July 2025

Copies of the meeting minutes and associated SID Close Out Letter are included in Appendix 5-3.

5.3.3 EirGrid Client Consultation Clinic

As outlined in Chapter 3. *Site Selection and Alternatives Considered* (see Table 3.2, and Section 3.3.6), Cloonkett Green Energy Ltd had an *EirGrid Client Consultation Clinic* (16th May 2024) to discuss the potential GCR options and rationale for OHL connection to on-site 220kv loop-in/out substation. During the initial design stages, Cloonkett Green Energy considered connecting the wind farm through a tail fed connection to Moneypoint. However, following a Client Consultation Clinic with EirGrid (16/05/2024), where various options were considered, it was confirmed that there was no capacity at Moneypoint. Other options were also discussed but it was confirmed that Prospect was not viable because there is no capacity there. Hence the optimum route was an on-site 220kV loop-in substation with connectivity to the existing, adjacent overhead 200Kv line. This option has the advantage that it could be built offline with a relatively short outage for the loop-in; and provides additional bays/capacity and hence future-proofing the grid connection. Furthermore, this option has the added benefit of significantly reducing the potential adverse effects on designated sites and/or sensitive aquatic species (e.g. Otter, FPM, Salmonids) downstream, protected structures and/or sensitive watercourse crossings.

5.4 Community Consultation and Public Information Events³

The purpose of EIA scoping and community engagement is to obtain valuable information about the local community and environment. This information assists in identifying the likely significant effects of the Proposed Development on the surrounding environment and community. In addition, this information forms part of the key issues to be considered in the design of the Proposed Development. Throughout the design of the Proposed Development and preparation of the EIAR, the Project team and Cloonkett Green Energy Ltd's Project Management team undertook consultations with community stakeholders either through correspondence via email, telephone, the formal EIA Scoping Consultation Document or through direct engagement. Additionally, a project specific website was established and updated regularly.

Throughout the process Cloonkett Green Energy strove for transparent and interactive engagement with the communities surrounding the Proposed Development site (please refer to EIAR Volume III, Appendix 5.2 for further information).

5.4.1 Information Service

A dedicated phone line (061 975 200) was set up in September 2023, operating from Monday to Friday between 9 and 5pm for the community to discuss the proposed development with the Community Liaison Officer. An email address (info@cloonkettgreenenergy.ie) was also set up in September of 2023 to facilitate public consultation, and was monitored daily with any correspondence received responded to in a timely manner - phone and in person consultation was offered to any queries seeking additional support. This provided adequate time to consider all responses and allowed anyone with queries to get in touch with the Project Team to ask questions or voice concerns via phone or email at any time during the project process.

³ The information presented in this Section is taken from the Cloonkett Green Energy – Community Engagement Report, produced by Cloonkett Green Energy Ltd – please refer to EIAR Volume III, Appendix 5.2.



A project specific website (www.cloonkettgreenenergy.ie) was developed and went live in September 2023 also. This was updated throughout the process with further information, FAQ's and useful documents added over time⁴.

5.4.2 Project Information – Leaflets, Brochure, and other resources

A number of materials informing the community about the project were circulated in the community by Cloonkett Green Energy Ltd and made publicly available on the projects website. These resources included:

- Project Information Leaflets: An initial Project Information Leaflet was delivered by post to all households within approximately a 2 kilometre distance of the proposed development, with the resource also being available on the project website.

A revised, second edition of the leaflet was circulated in March 2025 to reflect the appropriate updates and changes to the proposed development. This leaflet included details pertaining to the latest project updates and revisions and was also made available on the project website.

- Project Brochure: A 4 page Project Brochure (Climate Change & Renewable Energy) detailing the effects of climate change and Ireland's renewable energy targets was developed for the project (see Appendix 5-4 for the full brochure).
- Maps of the proposed development including, *inter alia*, the project area, turbine layout, and set back distances from dwellings and the sites zoning in the *Clare County Development Plan 2022 – 2028*.

The resources were also distributed directly to local people during various phases of the public consultation process such as during door-to-door engagements and at community clinics. Printed copies of all materials were available at any time, upon request

The resources were also sent by post, along with an accompanying letter, to all residents within a 2km radius (161 houses) of the proposed site on Thursday, 7th September 2023.

5.4.3 Elected Members Engagement

Personal emails and phone calls to all local representatives and TDs were made in September of 2023 and communication remains ongoing and open with all representatives.

5.4.4 Door to Door Community Engagement

In September 2023, over several days, the Community Liaison Officer and the communications team conducted door to door engagement. They visited 57 residential properties located within approximately one kilometre of a proposed turbine. The team spoke directly with 24 residents and left contact details in the form of an information pack in 33 occupied properties who were unavailable at the time of calling.

⁴ Community Engagement Report, Cloonkett Green Energy Ltd, 2025.



In response to queries or requests for further information from residents a leaflet outlined climate change, renewable energy and government targets was distributed. Furthermore, a tour of an operational wind farm was offered to those who expressed an interest in attending at the public exhibition to gain an understanding of wind energy and to experience an operational wind turbine in close quarters.

5.4.5 Community Engagement Clinics

Community Clinics were hosted in May 2025 provide an opportunity for local residents and members of the community to engage directly with the project team regards the proposed development. These clinics were held at the West County Hotel in Ennis, with letters of invitation sent to local residents over the weeks before the Clinics. During the clinic, the local community could:

- Book appointments to review the project's progress
- Examine updated maps
- Ask any questions or queries they had about the proposed development.

The clinic aimed to ensure transparency and facilitate open dialogue and discussion, allowing community members to voice concerns, seek clarifications, and gain a more in depth understanding of the projects potential impacts or implications in a setting where they would feel comfortable and secure . Please refer to EIAR Volume III, Appendix 5.2 which provides further information.

5.4.6 Media Outreach/Interaction

As part of the public consultations, the Applicant, sent an advertisement to the Clare Champion and Clare Echo Newspaper on Thursday, 7th September 2023. The Clare Champion and Clare Echo Newspaper subsequently published the information announcing the commencement of the community consultation for the Cloonkett Green Energy Project.

5.4.7 Website/Webpage

A project specific website (www.cloonkettgreenenergy.ie) was developed and went live in September 2023 also. As the project developed the content of the website also grew, being frequently updated with further information, FAQ's and responses, and useful documentation.

5.4.8 Summary of Key Issues Raised During Public Consultation

The following were the key issues raised during the public consultation process:

- Potential daytime and nighttime noise impact
- Mitigation of potential noise impacts
- Potential impact of turbine shadow flicker
- Proximity of development to turf-cutting areas and the impact of the proposed development on same



5.5 Conclusion

Consultation was carried out with a number of stakeholders, including Clare County Council, An Coimisiún Pleanála, Government Departments, Non-Governmental Organisations, aviation organisations, 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 Clare 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 Clare County Council during the scoping exercise which informed various aspects of the EIAR assessment.

Pre-planning consultation was held with An Coimisiún Pleanála in accordance with Section 37B of the *Planning and Development Act 2000* (as amended) to determine the key points and potential impacts of the proposed development and to inform the assessment methodology. These meetings also took place to conform with the Strategic Infrastructure Development (SID) process.

The public consultation stage commenced in September 2023 and has been facilitated for over 3 years through organising public consultation meetings and community workshops, door-to-door engagement, engagement with the local newspapers and representatives and materials circulated to local residents by post. The developer is committed to continued community engagement with residents as the planning process progresses.

A dedicated email address, phone number and postal address was 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 development process and to run-up to the application submission. In addition, a project website was set up to provide information and materials to inform the public of the proposed project.

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 the EIAR.



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