



Pinewoods Wind Farm Substation & Grid Connection

Chapter 1: Introduction

Pinewood Wind Ltd

Galetech Energy Services

Clondargan, Stradone, Co. Cavan Ireland

Telephone +353 49 555 5050

www.galetechenergy.com



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1.1 Introduction

This Environmental Impact Assessment Report (EIAR) has been prepared by Galetech Energy Services Limited (GES) on behalf of Pinewoods Wind Limited ('the Applicant') to inform the Environmental Impact Assessment (EIA) to be carried out in respect of a Strategic Infrastructure Development (SID) planning application submitted direct to An Bord Pleanála pursuant to Section 182A (Electricity Transmission Lines) of the Planning & Development Act 2000 (as amended) ('the Act').

The proposed development is a 110 kilovolt (kV) 'loop-in/loop-out' electricity substation generally comprising a switchroom, control building and substation compound enclosing 110kV electric plant together with two single circuit strain towers which will connect to the immediately adjacent and permitted 110kV Laois-Kilkenny Grid Reinforcement Project electricity transmission line (An Bord Pleanála Ref: PL11.VA0015). The proposed development is located in south County Laois approximately 17 kilometres (km) south of Portlaoise, 25km north of Kilkenny City, 8km southeast of Abbeyleix and 4km northeast of the village of Ballinakill. The proposed development will be located entirely within the townland of Knockardagur, County Laois.

The proposed development will form part of an adjacent wind farm development, located in both counties Laois and Kilkenny, which has already been granted planning permission by An Bord Pleanála by way of Section 34 of the Act (Refs: PL11.248518 & PL10.248392, the 'Pinewoods Wind Farm'). The permitted Pinewoods Wind Farm comprises 11 no. wind turbines each with a maximum tip height of up to 136.5 metres and all associated site development and ancillary works, including turbine foundations, crane hardstandings, 7.4km of site access tracks, underground electricity and communications cabling, site drainage works, 7 no. site entrances, a permanent meteorological mast with a maximum height of up to 85 metres and temporary upgrade to the R430/L7800 junction. The permitted development is located within the townlands of Knockardagur, Boleybawn, Garrintaggart, Ironmills (Kilrush) and Graiguenahown, Co. Laois; and Cruft, Co. Kilkenny.

The purpose of the proposed development¹ is to facilitate the export of renewable electricity generated by the Pinewoods Wind Farm to the national electricity grid by way of the immediately adjacent and permitted 110kV Laois-Kilkenny Grid Reinforcement Project electricity transmission line. The planning application for the permitted Pinewoods Wind Farm had previously included for a similar 110kV substation at this general location. However, this proposed substation was omitted from the planning permission by An Bord Pleanála by way of condition of consent. The Applicant is therefore now seeking planning permission for the substation, albeit of an amended design and layout, via Section 182A of the Act.

1.1.1 What is Environmental Impact Assessment (EIA)?

EIA is a process required by the European Union (EU) Environmental Impact Assessment Directive 2011/92/EU, as amended by 2014/52/EU, and transposed into Irish law by Part X of the Planning & Development Act 2000 (as amended).

¹ For the purposes of this EIAR, the terms 'proposed development', 'development', 'project', 'proposed development site', 'site', 'substation' and any variation thereof are used interchangeably throughout to describe 'the project' for the purposes of the EIA Directive and encompass and refer to the proposed substation and its associated ancillary infrastructure as described in **Chapter 3** of this EIAR.

EIA is carried out by the relevant competent authority, in this case An Bord Pleanála, to ensure that projects where the likelihood of significant effects on the environment cannot be excluded are subject to a comprehensive and independent examination, analysis and evaluation of their likely significant effects; including the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects; of both their construction and operational phases, prior to being granted planning permission.

EIA is fully integrated into the SID planning application process and helps to ensure that decisions to grant or refuse planning permission for proposed developments are made in the full knowledge of their likely significant effects on the environment, including through consultation with the public concerned.

1.1.2 What is Environmental Impact Assessment Report (EIAR)?

An EIAR is a written statement prepared by the developer (in this case, the Applicant) of the likely significant effects, if any, which the proposed development, if carried out, will have on the environment. The EIAR consists of a systematic analysis of the proposed development, including its construction and operational phases, in relation to the existing environment. It is an iterative process carried out throughout the full lifecycle of the project design and consenting process so as to allow for preventative and ameliorative action, as necessary, at a point in time when changes can still be made to the project that anticipate, avoid and mitigate any likely significant effects foreseen.

The EIAR is the principal document that informs the EIA process and provides integral information which An Bord Pleanála can use; amongst other considerations, including, where appropriate, its own supplementary assessments; in independently undertaking EIA and informing its decision to grant (including subject to conditions and/or modifications) or to refuse planning permission, and/or to seek further information from the Applicant.

The EIAR can also be used by third parties, including members of the public concerned, as part of the public participation process, to evaluate the proposed development and its likely significant environmental effects, and to make submissions to the SID planning application process.

1.2 SID Status

SID is development which is of strategic national or regional importance where a planning application must be made directly to An Bord Pleanála in the first instance, and not to the local Planning Authority as would be the normal course.

Electricity transmission infrastructure, as defined in Section 182A of the Act, may be SID. Therefore, prior to submitting a SID planning application, a proposed development must firstly be the subject of pre-application consultations with An Bord Pleanála pursuant to Section 182E to determine whether it constitutes SID, or not.

The planning application for the permitted Pinewoods Wind Farm had originally included for a similar 110kV 'loop-in/loop-out' substation at this general location. However, prior to granting planning permission for the wind farm, An Bord Pleanála wrote to the Applicant pursuant to Section 131 of the Act advising that, in its consideration, the substation element ought to be subject to pre-application consultations as to whether it came within the definition of SID.

The Applicant duly entered into pre-application consultations and a meeting was held on 13 June 2019 (Ref: ABP-303194-18). An Bord Pleanála subsequently determined that, in accordance with the report of its Inspector, the proposed substation would form a new interconnecting 'loop-in/loop-out' 'node' on the national electricity transmission network, incorporating high voltage electricity infrastructure of 110 kV or more, and therefore falls within the scope of Section 182A of the Act.

Accordingly, for this procedural reason the proposed substation was omitted from the planning permission for the Pinewoods Wind Farm by way of condition of consent (Condition No.4) and instead the Applicant was directed to make an application for permission for the substation directly to An Bord Pleanála by way of Section 182A. A copy of this determination is provided at **Annex 1.1 (Volume II)**.

1.3 Screening

The first stage of the EIA process involves deciding whether an EIA needs to be undertaken or not. This ensures that EIA is only undertaken for projects where the likelihood of significant effects on the environment cannot be excluded.

1.3.1 EIA Classes & Thresholds

Schedule 5 of the Planning & Development Regulations 2001 (as amended) specifies the classes of development which, where they comprise a certain class of development or exceed certain thresholds, must be subject to formal EIA. Where an EIA is mandatory, an EIAR is required to be submitted with a planning application.

The proposed development is not, of itself, a class of development listed within Schedule 5 as requiring EIA and, accordingly, there is no statutory requirement for the proposed development to be accompanied by an EIAR. The proposed development also does not qualify as a change or extension to a development already authorised (i.e. Pinewoods Wind Farm) pursuant to Schedule 5, Part 2, Class 13 of the Regulations as it does not engage any of the thresholds relating to installations for the harnessing of wind power for energy production (wind farms) i.e. number of turbines or megawatt output.

The purpose of EIA categories and thresholds is to generally distinguish between those projects where significant effects on the environment are unlikely and those that may be likely to have significant effects. Given that the proposed development is not a category of development that is mandatorily required to be subject to EIA, it can be generally concluded, on this basis, that it would be unlikely to have any significant effects on the environment.

1.3.2 Case-by-Case Screening

Notwithstanding the above, a screening assessment carried out pursuant to the Regulations may, having regard to the precautionary principle, determine on a case-by-case basis that EIA is required where the likelihood of significant effects on the environment cannot be excluded, including by reference to any likely significant in-combination effects with permitted and proposed projects and plans.

A 110kV substation, generally on the site of the proposed development, was previously included in the planning application and Environmental Impact Statement (EIS)² for the permitted Pinewoods Wind Farm (submitted in 2016).

² The planning application for the permitted Pinewoods Wind Farm was submitted prior to the formal transposition of EIA Directive 2014/52/EU. Prior to the transposition of that Directive, an EIAR was formerly known as an

Although, An Bord Pleanála determined that the Pinewoods Wind Farm, on its own or in-combination with other permitted or proposed developments in the vicinity would have no likelihood of significant direct, indirect, secondary or cumulative effects on the environment, and granted planning permission, it specifically excluded permission for the substation by way of condition of consent. This was for entirely procedural reasons as described in **Section 1.2** above.

Accordingly, the proposed development has been determined to be SID and forms part of an overall development that was formerly subject to EIA. It further connects into the permitted 110kV Laois-Kilkenny Grid Reinforcement Project electricity transmission line which is also a SID planning permission and formerly subject to EIA. As described in **Section 1.2** above, it has been determined that the proposed development will form a new 'node' on the national electricity transmission network, connecting the permitted Pinewoods Wind Farm to the national electricity grid. For these reasons, and in order to allow An Bord Pleanála to undertake a complete in-combination EIA of the proposed development, the Applicant has submitted an EIAR with the planning application, which includes up-to-date relevant environmental information with due cognisance to the current policy context.

This EIAR therefore assesses the likelihood of significant effects on the environment of the proposed development in combination with, *inter alia*, the permitted Pinewoods Wind Farm and the 110kV Laois-Kilkenny Grid Reinforcement Project electricity transmission line. This approach further accords with a judgement of the High Court (*O'Grianna & Ors. v. An Bord Pleanála [2014] IEHC 632*) which determined that a wind farm development, to which the EIA Directive applies, and its connection to the national grid are considered a single indivisible project for the purpose of the EIA Directive and should be subject to a complete, cumulative EIA. Pre-application consultations with An Bord Pleanála, as described in **Section 1.10** below, have also confirmed that an EIAR should be submitted with this SID planning application.

1.4 Content

In order to be relevant, complete and legally compliant, the content of this EIAR includes all of the information required by EIA Directive 2011/92/EU, as amended by 2014/52/EU, and national legislation as appropriate and necessary to the specific characteristics of the proposed development, and includes:-

- (a) A description of the project comprising information on the site, design, size and other relevant features of the project;
- (b) A description of the likely significant effects of the project on the environment;
- (c) A description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (d) A description of the reasonable alternatives studied by the developer (the Applicant), which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- (e) A non-technical summary of the information referred to in points (a) to (d); and,

Environmental Impact Statement (EIS). Accordingly, the acronym 'EIAR/EIS' is used henceforth in this EIAR to refer to the Pinewoods Wind Farm EIS.

- (f) Any additional information specified in Annex IV of the EIA Directive relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

1.5 Format

The EIAR is presented as 3 no. volumes, which are interrelated and should be read in conjunction with each other, as follows:-

- **Volume I** comprises the main EIAR text and follows a 'grouped format' structure where each environmental factor is assessed and presented as a separate chapter. The EIA Directive prescribes the range of environmental factors which should be used to organise descriptions of the environment and likely significant environmental effects. These have been supplemented with additional environmental factors owing to the characteristics of the project under assessments, as follows:-
 - Chapter 1: Introduction;
 - Chapter 2: Assessment of Project Alternatives;
 - Chapter 3: Description of the Proposed Development;
 - Chapter 4: Population & Human Health;
 - Chapter 5: Biodiversity;
 - Chapter 6: Land & Soils;
 - Chapter 7: Water;
 - Chapter 8: Air Quality & Climate;
 - Chapter 9: Landscape;
 - Chapter 10: Cultural Heritage;
 - Chapter 11: Noise & Vibration;
 - Chapter 12: Shadow Flicker;
 - Chapter 13: Material Assets; and
 - Chapter 14: Interactions of the Foregoing.
- **Volume II** comprises a range of annexes, including technical data and reports, which informed the impact assessment provided in **Volume I** so as to ensure the EIAR is transparently supported by verifiable evidence.
- **Volume III** comprises the EIAR/EIS prepared in respect of the permitted Pinewoods Wind Farm. This EIAR/EIS has been provided to ensure that An Bord Pleanála has before it, and easily to hand for the purposes of cross-referencing, all necessary and relevant environmental assessments related to the entire project to allow for a complete and comprehensive cumulative assessment of the likely significant effects on the environment, including in-combination effects.

A Non-Technical Summary of the EIAR is also provided as a separate standalone volume in order to facilitate the wider public concerned in their involvement in the statutory consultation process during the EIA and planning application determination stage.

1.6 Structure

In order to provide for a consistent approach and to communicate clear, concise, unambiguous information, each chapter of this EIAR is systematically organised so as to follow a similar basic structure, as follows:-

- **The existing environment:** A description of the context, character, significance

and sensitivity of the receiving (baseline) environment using standard descriptive methods, in order to predict the likely significant effects of the proposed development;

- **The likely significant impacts of the proposed development:** The aspects of the construction, existence and operation of the proposed development that are likely to affect the existing environment including, as appropriate, predicted, potential, residual, 'do nothing' and 'worst case' effects. The likely significance of any effects is determined with reference to magnitude, intensity, integrity, duration and probability; and
- **The measures to mitigate and monitor adverse effects:** The range of methods which are proposed for mitigation by avoidance, reduction and remedy of any likely significant effects (including unplanned events) together with ongoing monitoring of the efficacy of mitigation measures.

This structure, which clearly separates data (descriptions of the receiving environment and of the project) from impact predictions (likely significant effects and mitigation measures), is designed to ensure that replicable impact assessments, based on rigorous scientific information and verifiable evidence, is carried out using recognised methods that are presented and documented in a fully legible, transparent and objective manner.

This methodological structure is designed to reduce any possible subjective information and bias in order to facilitate An Bord Pleanála in their independent EIA of the proposed development.

1.7 Guidance

A range of general statutory and non-statutory guidance documents were consulted in undertaking and preparing this EIAR, including *inter alia*:-

- Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2017);
- Draft Advice Notes for preparing Environmental Impact Statements (Project Type 33) (EPA, 2015);
- Wind Energy Development Guidelines for Planning Authorities (DoEHLG, 2006);
- Review of the Wind Energy Development Guidelines – Preferred Draft Approach (DHPLG, 2017);
- Draft Wind Energy Development Guidelines for Planning Authorities (DHPLG, 2019)
- Best Practise Guidelines for the Irish Wind Energy Industry (IWEA, 2012);
- Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018)
- Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment (European Commission; 2013);
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (DHPLG, 2018);
- Guidelines for Environmental Impact Assessment of Electricity Transmission Projects (Eirgrid, various); and
- Electricity Transmission Studies Evidence-Based Environmental Studies (Eirgrid, various).

The above is a general and non-exhaustive list of EIAR related guidance. Additional guidance documents, specific to each environmental factor, is referenced in each chapter of this EIAR, as relevant.

1.8 EIAR Project Team

The EIA Directive requires that an EIAR must be prepared by a team of competent, qualified experts with an appropriate combination of experience, expertise and knowledge related to the significance, complexity and range of effects that an EIAR needs to assess. Such competence includes an understanding of the legal context of the decision-making process and a variety of technical experts to address different environmental topics, and their interactions, in order to ensure that the information included in the EIAR is complete to a high level of objective quality.

1.8.1 Project Management

GES has been appointed by the Applicant to manage and co-ordinate the management and preparation of this EIAR. GES is an Irish multi-disciplinary renewable energy consultancy that specialises in the project management of planning, environmental and technical engineering services of wind energy developments from project feasibility through to delivery and operation. GES combines the expertise of leading experts in wind farm design, planning and environmental assessment and has extensive experience in managing and coordinating EIAR projects for wind energy and associated electricity grid and substation developments. Some examples of wind energy and ancillary EIAR projects managed by GES are provided in **Table 1.1** below.

Development	Development Description	Status
Carrickallen Wind Farm, Co. Cavan	Wind Farm comprising 10 no. wind turbines and associated ancillary infrastructure.	Operational
Oldmill Wind Farm, Co. Monaghan	Wind Farm comprising 7 no. wind turbines and associated ancillary infrastructure.	Operational
Taghart Wind Farm, Co. Cavan	Wind Farm comprising 7 no. wind turbines and associated ancillary infrastructure.	Permitted
Taghart Wind Farm Grid Connection, Co. Cavan & Co. Meath	Approximately 12km of underground electricity line located predominately within the carriageway of the public road network.	Permitted
Cloghan Wind Farm, Co. Offaly	Wind Farm comprising 9 no. wind turbines and associated ancillary infrastructure.	Permitted
Cloghan Wind Farm Grid Connection, Co. Offaly	Approximately 8km of underground electricity line located predominately within the carriageway of the public road network.	Permitted
Pinewoods Wind Farm, Co. Laois	Wind Farm comprising 11 no. wind turbines and associated ancillary infrastructure	Permitted
Drumlins Park Wind Farm, Co. Monaghan	Wind Farm comprising 8 no. wind turbines and associated ancillary infrastructure	Proposed

Table 1.1: Examples of EIAR wind energy projects managed by GES

1.8.2 Environmental Specialists

The EIAR is also critically dependent on the technical expertise, experience, independence and objectivity of environmental specialists. They characterise the existing environment and evaluate its sensitivity and likely significant effects.

An overview of the specialist experts involved in the preparation of each chapter of this EIA, together with their relevant qualifications and key environmental factors covered, is provided in **Table 1.2** below. Some specialisms were provided in-house by GES expert staff while in other cases external specialists were appointed as expert consultants in order to undertake individual assessments and prepare specific chapters on environmental topics.

Each appointed specialist is a recognised expert in their field and was selected having regard to their knowledge of relevant environmental legislation; their experience and involvement in EIA projects for wind energy developments; familiarity with pertinent standards and criteria for the evaluation and classification of significance of effects; the ability to interpret technical documents and to work with project designers to arrive at practical and reliable measures to avoid, mitigate and monitor likely significant effects; and to clearly and comprehensively present their findings in a concise and objective manner. A statement of competence for all of the specialist consultants who contributed to the preparation of this EIA is provided in each individual chapter of this EIA, as appropriate.

As part of its project management role, GES undertook overall editorial management of the EIA to ensure consistency and cross-referencing between different chapters and volumes, and identifying likely interactions between separate environmental factors, together with general project management, briefing and steering of specialist consultants throughout the iterative EIA and design process.

Ch.	Environmental Topic	Specialist Consultant	Personnel
1	Introduction	GES	Gavin Daly
2	Assessment of Project Alternatives , including: <ul style="list-style-type: none"> Alternative Grid Connections; and Alternative Substation Technologies. 	GES	BA Dip (ERM) MIPI Simon Carleton BA (Hons) MSc MIPI
3	Description of the Proposed Development , including: <ul style="list-style-type: none"> Substation & Grid Connection; Construction Materials & Aggregates; Earthworks; and Drainage & Surface Water Management 	GES	Declan Owens BSc MSc MIPI Conor Foy BSc MSc AIEMA
4	Population & Human Health , including: <ul style="list-style-type: none"> Employment; Human Health (considered with reference to benchmark standards under other chapters such as noise, landscape, air quality etc.); and Amenity. 	GES	
5	Biodiversity , including: <ul style="list-style-type: none"> Habitats Birds Bats Non-volant mammals; and Aquatic ecology. 	SLR Consulting	Elaine Dromey Úna Nealon
6	Land & Soils , including: <ul style="list-style-type: none"> Superficial Geology; Bedrock Geology; Geological Heritage & Designated Sites; and 	Hydro-Environmental Services	Michael Gill David Broderick

	<ul style="list-style-type: none"> • Soil Contamination. 		
7	Water , including: <ul style="list-style-type: none"> • Local & Regional Hydrology; • Flood Risk; • Hydrogeology; • Ground/Surface physical characteristics; and • Drainage Management. 	Hydro-Environmental Services	Michael Gill David Broderick
8	Air Quality & Climate , including: <ul style="list-style-type: none"> • Air Quality; • Climate; • Dust; • Greenhouse gas emissions; and • Contribution of Proposed Development to binding targets. 	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy
9	Landscape , including <ul style="list-style-type: none"> • Landscape Character; • Views & Prospects • Landscape Impact; and • Visual Impact. 	Macro Works	Richard Barker Rory Curtis
10	Cultural Heritage , including <ul style="list-style-type: none"> • Known archaeological monuments; • Areas of archaeological potential (including unknown archaeology); • Architectural heritage; and • Designations or sensitivities 	Dermot Nelis Archaeology	Dermot Nelis
11	Noise & Vibration , including <ul style="list-style-type: none"> • Daytime Noise; • Night time Noise; • Vibration sources; and • Sensitive receptors. 	AWN Consulting	Mike Simms
		GES	Cormac McPhillips
12	Shadow Flicker , including <ul style="list-style-type: none"> • Worst Case Effects; • Expected Effects; and • Mitigation Measures. 	GES	Cormac McPhillips Gavin Daly Simon Carleton Declan Owens Conor Foy
13	Material Assets , including <ul style="list-style-type: none"> • Transport & Access; • Aviation; • Telecommunications; and • Resources & Utility Infrastructure. 	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy
14	Interaction of the Foregoing	GES	Gavin Daly Simon Carleton Declan Owens Conor Foy
Non-Technical Summary		GES	Gavin Daly Simon Carleton Declan Owens Conor Foy

Table 1.2: Specialist Consultants involved in the preparation of this EIAR

1.9 Scoping

The scoping process involves identifying the environmental factors that are likely to be significant during EIA and eliminates those that are not. The scoping process is highly interrelated with the consultation process as described in **Section 1.10**. The prior determination of the nature and detail of the information to be contained in the EIAR is one of the most important stages of EIA and may be conducted through a formal or informal process. Scoping helps ensure that the EIAR remains focussed on factors that are environmentally based, likely to occur and may have likely significant and adverse effects.

In undertaking scoping, the statutory obligations as set out in Schedule 6 of the Planning & Development Regulations 2001 (as amended) ('the Regulations') and a range of guidance documents were consulted, including those referenced in **Section 1.7**. A desktop analysis was undertaken of relevant data sources and precedents of EIAs carried out for similar developments, together with other relevant policy documents, such as the Laois County Development Plan 2017–2023 and accompanying Strategic Environmental Assessment (SEA). The scoping process also considered relevant secondary and off-site developments not included within the planning application, including the EIA carried out for the permitted Pinewoods Wind Farm and 110kV Laois-Kilkenny Grid Reinforcement Project electricity transmission line.

1.9.1 Scoping Report

As part of the scoping process, the Applicant initially prepared an 'Outline Scoping Report' to provide a high level overview of the project context; description of the baseline environment; alternatives considered; the proposed development; its likely significant environmental effects; and mitigation and monitoring measures. This report was used in the course of the consultation process, as described in **Section 1.10** below, to allow consultees to inform themselves of the scope and likely significant environmental effects of the project, and to provide comments on the information which should be included in the EIAR, so that a focused and robust EIAR is produced.

1.9.2 Formal Scoping

Section 182E(3) of Act provides for a discretionary provision whereby a prospective applicant during pre-application consultations with An Bord Pleanála may formally request an opinion on the scope and level of detail to be included in the EIAR. In this case, no formal scoping was considered necessary. In the course of pre-application consultations, An Bord Pleanála gave advice to the Applicant on the considerations related to proper planning and sustainable development, and the environment, which may have a bearing on its decision in relation to any subsequent SID planning application. This included advices pertaining to the scope and level of detail to be included in the EIAR, as further described in **Section 1.10** below.

1.9.3 Informal Scoping

Informal scoping was carried out through ongoing iterative dialogue and feedback processes between the EIAR Project Team and the Applicant's project design team, and through the feedback received from the consultation process. Informal scoping was considered the most appropriate means of EIAR scoping in this case, as it was envisaged from the outset that no environmental factors would be scoped out or eliminated from the EIAR. Accordingly, no formal scoping was considered necessary

and all environmental factors, as prescribed in the transposing legislation, have been fully addressed and included in this EIAR, as described in **Section 1.5** above.

As an active process, scoping continued throughout the preparation of the EIAR, including during the impact assessment stage, and the EIAR Project Team maintained a flexible view of the scope throughout by way of open, effective and ongoing communication, and consultation. The project design was dynamically informed and continually reviewed in light of environmental criteria and information emerging during the scoping process, and *vice versa*. This process resulted in the effective anticipation of any likely significant environmental effects and the consequent modification of the proposed development to avoid or reduce effects through redesign and identification of mitigation measures. This process has resulted in the assessment and consideration of a number of Reasonable Alternatives as described in **Chapter 2**.

1.10 Consultations

1.10.1 Pre-Application Consultations

As discussed in **Section 1.2** above, the proposed development was the subject of mandatory pre-application consultations meeting with An Bord Pleanála. As prescribed by legislation, the purpose of the pre-application consultations was twofold. Firstly, to determine whether the proposed development constituted SID; and if so, secondly, to give advice to the Applicant on the procedures involved in making such an application and what considerations, related to proper planning and sustainable development or the environment, in the opinion of An Bord Pleanála, may have a bearing decision in relation to any subsequent SID planning application.

A meeting was held between the Applicant and An Bord Pleanála on 13 June 2019. During this meeting, advice was given to the Applicant on the key environmental factors which would be relevant as part of the EIAR for any subsequent SID planning application. A copy of the meeting record was subsequently furnished to the Applicant (see **Annex 1.2 (Volume II)**) which listed the following pertinent environmental factors to be addressed in the EIAR:-

- Archaeology;
- Visual impact on the surrounding landscape;
- Ecological impacts, including potential impacts on designated sites;
- Watercourses and fisheries;
- Residential amenities;
- Noise;
- Construction traffic routes; and,
- Bats and birds.

Given the passage of time since the submission of the planning application for the Pinewoods Wind Farm in 2016, the Applicant was also advised of the need to ensure that all environmental data is up-to-date and be cognisant of any policy changes which have occurred in the interim and any implications arising from the revised EIA Directive 2014/52/EU. The Applicant was further advised that the EIAR should take into account any likely significant in-combination effects of the proposed development and that a schedule of proposed monitoring and mitigation measures should also be included as a stand-alone appendix document in the EIAR submitted.

A preliminary list of prescribed bodies, which were considered relevant and to be consulted by the Applicant were provided, which were also confirmed in the subsequent formal determination letter (see **Annex 1.1, Volume II**). Each of these prescribed bodies were contacted by the Applicant as part of the consultation process for the preparation of this EIAR.

1.10.2 Planning Authority Consultations

As part of the pre-application consultation process, An Bord Pleanála identified Laois County Council, as the relevant planning authority for the proposed development site, and Kilkenny County Council, as the immediately adjacent planning authority, as relevant prescribed bodies for the purposes of EIAR consultation.

Laois County Council

A scoping request was issued to Laois County Council on 20 February 2020 and included the 'Outline Scoping Report' described in **Section 1.9.1** above, in order to provide the Local Authority with sufficient information on the proposed development and its likely significant environmental effects.

A consultation meeting with Laois County Council was held (via telephone) on 30 June 2020. During the meeting, the project was described in detail together with the relevant environmental factors, including, *inter alia*, population & human health (proximity to residential dwellings), biodiversity, transport, flooding, and landscape and visual amenity to be addressed in the EIAR. A written record of the meeting was subsequently provided by the Planning Authority and a copy of same is enclosed at **Annex 1.3 (Volume II)**.

Kilkenny County Council

A scoping request was issued to Kilkenny County Council on 20 February 2020 and included the 'Outline Scoping Report' described in **Section 1.9.1** above, in order to provide the Local Authority with sufficient information on the proposed development and its likely significant environmental effects. Two separate responses were received from Kilkenny County Council relating to the appropriate protection of watercourses and preferred access arrangements.

1.10.3 Stakeholder & Prescribed Body Consultations

A wide range of statutory and non-statutory organisations, including all bodies prescribed in the Planning & Development Regulations 2001 (as amended) and those listed in An Bord Pleanála's pre-application consultation determination, were contacted in writing at early stage in the scoping process to gather their views on the EIAR scope and the likely significant environmental effects of the proposed development. The consultation process involved furnishing each organisation with the 'Outline Scoping Report' described in **Section 1.9.1** above, accompanied by a set of maps and drawings, and requesting written feedback.

Annex 1.4 (Volume II) provides a sample copy of the consultation letter issued to each organisation, while a copy of all responses received is enclosed at **Annex 1.5 (Volume II)**. **Table 1.3**, below, lists all organisations which have been consulted, details whether or not a response was received and provides a summary of the content contained therein. The specific prescribed bodies identified by An Bord Pleanála as relevant and to be consulted by the Applicant are also identified.

While the consultation undertaken to date has allowed for any identified concerns to be addressed within this EIAR; the statutory consultation process, to be commenced following submission of the SID planning application to An Bord Pleanála, will allow these organisations to make any further comments, as necessary.

1.10.4 Community Consultation & Participation

Non-Statutory Consultation

Community consultation and participation is a key element of each stage of the EIA process and there are specific statutory and non-statutory procedures for public consultation at various stages in the EIA process. While it is not obligatory during the pre-application scoping and preparation of an EIAR, the Applicant has undertaken extensive public consultation throughout the overall development design process. For the most part, this consultation was undertaken as part of the former Pinewoods Wind Farm EIAR/EIS process in 2015/2016 which included a proposal for a 110kV substation on the proposed development site.

Consultations comprised one-to-one discussions between the Applicant and homeowners and local residents whose dwellings are located within 2km of the now-permitted Pinewoods Wind Farm. Local community groups, political representatives and other relevant stakeholders were also consulted regarding the overall development. Two public consultation days were also held which allowed members of the local community to discuss the project directly with representatives on behalf of the Applicant. A Community Consultation & Stakeholder Engagement Report which details the public consultation process undertaken is presented at **Annex 1.6 (Volume II)**. This approach is now recommended as standard per the *Draft Wind Energy Development Guidelines for Planning Authorities 2019*.

In addition, concerns raised by local residents in previous submissions related to the Pinewoods Wind Farm; including visual and landscape effects, loss of local amenity, noise, shadow flicker, health, effects on wildlife, water quality, equine and livestock, road use and widening, and likely effects on property prices and tourism; have all been taken account of in this EIAR as they relate to the proposed development.

Statutory Consultation

Once the SID planning application and EIAR is formally submitted for consideration; the Applicant, An Bord Pleanála and Laois County Council will make arrangements for public access and dissemination of the information contained in the EIAR in accordance with the procedures contained in the transposing legislation and as described in **Section 1.15** below.

1.10.5 Transboundary Consultations

The EIA Directive and transposing legislation requires that, where appropriate, consultations regarding the likelihood of transboundary effects of a project shall be undertaken. Given that the proposed development is not proximate to any international boundary, it was not deemed necessary to consult with any international organisations or authorities nor has An Bord Pleanála requested same during pre-application consultations.

Consultee	Requested in SID Determination	Response Received	Summary of Feedback
An Garda Síochána	-	No	-
An Taisce	Yes	No	-
Bat Conservation Ireland	-	No	-
Birdwatch Ireland	-	No	-
Bord Gáis Energy	-	No	-
Broadcasting Authority of Ireland	-	No	-
BT Communications Ireland	-	No	-
Commission for Communications Regulation	-	No	-
Commission for Regulation of Utilities	Yes	No	-
Department of Agriculture, Food and the Marine	-	Yes	General response relating to felling licenses and associated requirements.
Department of Communications, Climate Action and Environment	Yes	No	-
Department of Culture, Heritage and the Gaeltacht	Yes	No	-
Department of Defence	-	Yes	No observations.
Department of Planning, Housing and Local Government	-	No	-
Department of Transport, Tourism and Sport	-	No	-
Eastern & Midland Regional Authority	-	No	-
Eirgrid	-	No	-
Environmental Protection Agency	-	No	-
ESB Networks	-	No	-

Consultee	Requested in SID Determination	Response Received	Summary of Feedback
Fáilte Ireland	Yes	Yes	Requested to have regard to Fáilte Ireland's Guidelines for the Treatment of Tourism addressed in the EIAR.
Gas Networks Ireland	-	Yes	No Gas Networks Ireland infrastructure in vicinity of proposed development.
Geological Survey of Ireland	-	Yes	No specific comments. Recommend that geo-hazards and groundwater features be considered in the EIAR.
Health and Safety Authority	-	Yes	No observations.
Health Service Executive – Environmental Health Department	Yes	No	-
Iarnród Éireann	-	No	-
Imagine Group	-	No	-
Inland Fisheries Ireland	Yes	No	-
Irish Aviation Authority	-	No	-
Irish Peatland Conservation Council	-	No	-
Irish Raptor Study Group	-	No	-
Irish Water	Yes	Yes	General response requesting appropriate assessment of water environment.
Irish Wildlife Trust	-	No	-
Kilkenny County Council	Yes	Yes	The protection of watercourses should be addressed along with all environmental risks. Roads Design Office request that the L1828 local road is avoided.
Laois County Council	-	No	-

Consultee	Requested in SID Determination	Response Received	Summary of Feedback
Meteor Mobile Communications Ltd (Eir Mobile)	-	Yes	No transmission services will be affected.
Mosaic Net	-	No	-
National Ambulance Service	-	No	-
National Federation of Group Water Schemes	-	No	-
National Parks & Wildlife Service	-	No	-
National Trails Office	-	No	-
Netshare Ireland	-	No	-
Office of Public Works	-	No	-
Open Eir	-	No	-
Ripplecom	-	No	-
2rn (RTE Transmission Network Ltd)	-	Yes	Low risk of any interference.
Sustainable Energy Authority of Ireland	-	Yes	Recommended to contact Laois County Council.
Tetra Ireland Communications Ltd	-	No	-
The Arts Council	-	No	-
The Heritage Council	Yes	No	-
Three (3) Ireland	-	No	-
Towercom	-	No	-
Transport Infrastructure Ireland	Yes	Yes	Recommendation to consider and safeguard future national road schemes, identify and assess haul routes, carry out a Road Safety Audit where applicable and to have regard to Transport Infrastructure Ireland guidelines.

Consultee	Requested in SID Determination	Response Received	Summary of Feedback
Údarás na Gaeltachta	-	No	-
Virgin Media Ireland	-	No	-
Vodafone Ireland Ltd	-	No	-
Waterways Ireland	-	No	-

Table 1.3: Summary of Written Consultations

1.11 Cumulative Impact

This EIAR has considered the likelihood of the proposed development, in its totality including secondary and off-site developments, acting in combination with other existing, permitted and proposed projects and plans in the wider vicinity of the proposed development site, to result in likely effects on the environment which, when combined, may result in effects which are cumulatively significant.

In the first instance, a desktop review of available data sources was undertaken to identify existing developments in the local area. Secondly, the EIA Portal³ was consulted to assess for the presence of proximate developments which have been subject to EIA. Finally, the online ePlan portals of both Laois County Council⁴ and Kilkenny County Council⁵ were examined to assess for extant planning permissions which had not yet been commenced. Developments warranting a cumulative impact assessment range from one-off rural dwellings to large-scale quarrying and wind energy developments. **Table 1.4**, below, provides a non-exhaustive list of developments which have been considered in the cumulative impact assessment of this EIAR.

Development	Planning Register Reference	Integrated Pollution Control (IPC) or Industrial Emissions Directive (IED) License	Development Description
One-off Rural Dwellings (Laois & Kilkenny)	Various	N/A	Assorted developments including detached dwellings, bungalows and extensions.
Agricultural Developments (Laois & Kilkenny)	Various	N/A	Assorted developments including livestock housing buildings, silage pits and dairy facilities.
Kilsaran Quarries (Laois)	13/190	N/A	Quarrying and associated operations across a 6.7ha site
Behan Quarries (Laois)	Various	N/A	Quarrying Activities including crushing plants, site offices and wastewater treatment units.
Booth Precast Products (Laois)	20/7	N/A	Quarrying and associated operations across an 8.5ha site
Bord na Móna Powergen Anaerobic Digestion Facility	19/530	N/A	Renewable Gas Facility and associated development on a 17.34ha site
Pinewoods Wind Farm (Laois)	16/260 (An Bord Pleanála Reference)	N/A	Construction and operation of an 11 no. turbine wind farm.

³ <http://housingaovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>

⁴ <http://www.eplanning.ie/LaoisCC/searchtypes>

⁵ <http://www.eplanning.ie/KilkennyCC/searchtypes>

	PL11.248518)		
Pinewoods Wind Farm (Kilkenny)	17/62 (An Bord Pleanála Reference PL10.248392)	N/A	Construction of approximately 2km of wind farm access track and electrical and communications cabling
Cullenagh Wind Farm (Laois)	13/268 (An Bord Pleanála Reference PL11.242626)	N/A	Construction and operation of an 18 no. turbine wind farm.
Laois-Kilkenny Grid Reinforcement Project (Laois & Kilkenny)	An Bord Pleanála Reference PL11.VA0015	N/A	Electricity Transmission Infrastructure

Table 1.4: Developments addressed in cumulative impact assessment

1.12 Impact Assessment

This EIAR focuses on describing environmental effects that are both likely and significant by reference to the individual environmental factors described in **Section 1.5** and their sensitivities. In order to provide for clarity of method, language and meaning, and to accurately explain the full range of effects, the impact classification and sensitivity terminology described in the *Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2017)* is used in this EIAR to ensure that all likely significant effects are adequately considered and clearly and transparently communicated.

Within this EIAR, a distinction is drawn between 'impacts' and 'effects'. In accordance with the *Guidelines for Ecological Impact Assessment in the UK and Ireland (CIEEM, 2018)*, an 'impact' is an action resulting in changes to the environment (for example, the construction activities of a development removing a hedgerow). An 'effect' is the outcome on the environment from an 'impact' (for example, the effects on a dormouse population from loss of a hedgerow). The effect arising from an impact may, or may not be, likely significant⁶.

Significance is a concept related to the weight that should be attached to effects when decisions are made. A significant effect is an effect that is sufficiently important to require assessment and reporting so that the competent authority (An Bord Pleanála) is adequately informed of the environmental consequences of permitting a project.

Further specific guidance, legislation and technical standards for describing environmental effects, and pertinent to particular environmental topics, are also described in each individual chapter of this EIAR, as necessary.

Magnitude	Sensitivity of Receptor
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⁶ As the purpose of this EIAR is to provide a report of the effects, if any, which proposed development would have on the environment, the term 'effects' is used generally throughout this EIAR.

	Very High	High	Medium	Low	Negligible
Very High	Profound	Profound-substantial	Substantial	Moderate	Slight
High	Profound-substantial	Substantial	Substantial - moderate	Moderate-slight	Slight-imperceptible
Medium	Substantial	Substantial - moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate-slight	Slight	Slight-imperceptible	Imperceptible
Negligible	Slight	Slight-imperceptible	Imperceptible	Imperceptible	Imperceptible

Table 1.5: Impact Significance Matrix

Source: Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EPA, 2017)

- * Categories with dark grey shading are considered to equate with 'significant' effects
- ** The significance matrix provides an indicative framework from which the significance of impact is derived.

1.13 Mitigation & Monitoring Measures

Each chapter of the EIAR includes a description of the measures proposed to avoid, prevent, reduce or offset, as appropriate, any likely significant effects on the environment together with any proposed monitoring measures in respect of both construction and operational phases. Many mitigation measures have already been incorporated into the project design at an early stage, through the iterative scoping and impact assessment processes, to avoid any likely significant environmental effects. Monitoring measures have also been proposed, where appropriate, to demonstrate compliance with, and efficacy of, the mitigation measures proposed.

In order to ensure clarity of the mitigation and monitoring measures proposed, and as requested by An Bord Pleanála during pre-application consultations, all such measures are included in a compendium as a separate annex to this EIAR (see **Annex 1.7, Volume II**).

1.14 Non-Technical Summary

A short, accessible non-technical summary has also been prepared as a separate and self-contained document which can be distributed to the public concerned and who may be likely to be affected by the proposed development. It also contains the details on how members of the public and other organisations can submit any observations they may have to the EIA and SID planning application assessment process.

The non-technical summary is laid out in a similar, but condensed, format to the main EIAR, i.e. describing the project, existing environment, effects and mitigation

and monitoring measures, but presented in a manner that avoids technical language, such that it is easily understandable and accessible to a layperson.

The purpose of the non-technical summary is to transparently facilitate the full public access and participation of the public concerned in the statutory consultation process following the submission of the SID planning application to An Bord Pleanála.

1.15 Public Access & Participation

Public access and participation is a core feature of the EIA process. Compliance with the Aarhus Convention and the EIA Directive requires that arrangements for public access facilitate the convenient dissemination of the information contained in the EIAR in a timely and fully transparent manner. The core objective is to ensure that the public is made as fully aware as possible, and at the earliest possible stage, of the likely significant environmental effects of the proposed development prior to a decision being made by An Bord Pleanála.

Prior to the submission of the SID planning application, public newspaper notices will be published and site notices erected in accordance with the legislative requirements and any further directions provided by An Bord Pleanála. Full information will also be made available on how the public concerned can access the SID planning application documentation and this EIAR, and involve themselves in the decision-making process, including through making written submissions.

An Bord Pleanála and the Planning Authority (Laois County Council) will also make arrangements for public access and dissemination of this EIAR and other SID planning application documentation in accordance with the procedures contained in the legislation. This will include making all documents available to view and purchase at the offices of An Bord Pleanála (64 Marlborough Street, Dublin 1, D01 V902) and the Planning Authority (Áras an Chontae, JFL Avenue, Portlaoise, Co. Laois, R32 EHP9). URL hyperlinks to all documents will also be available on the website of An Bord Pleanála.

A centralised EIA Portal⁷, managed by the Department of Housing, Local Government and Heritage, is a publicly accessible map-based database that provides users with access to all applications for development consent which have been accompanied by an EIAR since 16 May 2017. Following the submission of the planning application to An Bord Pleanála, the public concerned will also be able to access this EIAR via the EIA portal website. The EIAR shall be submitted in a format searchable by electronic means, in so far as practicable.

Finally, the Applicant is also required to provide a dedicated standalone website containing all of the SID planning application documentation and this EIAR. The address of this website (www.pinewoodswindfarmsubstationsid.ie) will be included in the public notices described above.

1.16 Habitats Directive Appropriate Assessment

1.16.1 Appropriate Assessment Screening (Stage 1)

As a separate but interrelated process, screening for the likelihood of any significant effects on European nature conservation sites (Natura 2000) designated under the EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) was also

⁷ [EIA Portal](#)

undertaken through the preparation of what is known as an Appropriate Assessment (AA) Screening Report (Stage 1). This is formally a separate assessment process, with discrete reporting requirements, but is obviously highly interrelated with EIAR.

The AA Screening Report assesses whether the preparation and submission of a Natura Impact Statement (NIS) to inform an AA (Stage 2), also to be undertaken by An Bord Pleanála as the competent authority, is required.

The AA Screening Report prepared on behalf of the Applicant concludes that it could not be confirmed that, in the absence of avoidance or reduction (mitigation/protective) measures, designated conservation sites would not be adversely affected by the direct and indirect effects of the proposed development, either individually or in combination with other plans and projects, having regard to their conservation objectives.

As a result, and in accordance with the precautionary principle, it was concluded that the proposed development should proceed to be subject to a Stage 2 AA and that a NIS should be prepared and submitted with the planning application alongside this EIAR.

1.16.2 Natura Impact Statement (Stage 2)

The NIS is presented and submitted as a separate standalone document and accompanies the SID planning application. The NIS includes both the Stage 1 Screening Report and the Stage 2 Assessment

The Biodiversity chapter of this EIAR (**Chapter 5**) does not repeat the detailed assessment included in the NIS but cross refers to the findings of this separate assessment, as necessary. This is as per EPA draft Guidance (2017), “a biodiversity section of an EIAR, should not repeat the detailed assessment of potential effects on European sites contained in a Natura Impact Statement” but should “incorporate their key findings as available and appropriate”.

1.17 Limitations and Difficulties Encountered in Compiling the EIAR

No general difficulties or limitations, including technical deficiencies or lack of knowledge, were encountered in compiling the information required to be provided in this EIAR. Where specific difficulties or limitations were encountered in relation to specific environmental factors, they are reported in the individual chapters of this EIAR, as appropriate.

1.18 Note on Quotations

It is important to acknowledge that statutory EIAR requirements call for a comprehensive description of the existing environment as well as all likely significant effects. The EIAR therefore contains statements describing the positive and negative aspects of the proposed development. Selective quotation, out of context, may not be representative of the overall findings of the EIAR and, therefore, any quotations should be provided in their proper context.

1.19 Relationship to the Planning Application

For the avoidance of doubt, not all elements of the entire development assessed in this EIAR are the subject of the planning application; and this EIAR should be read in conjunction with the plans and particulars of the applicable planning application.

