



CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE &
PLANNING

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED COUNNAGAPPUL WIND FARM, CO. WATERFORD

VOLUME 2 - MAIN EIAR

CHAPTER 5: EIA SCOPING AND CONSULTATION

Prepared for:
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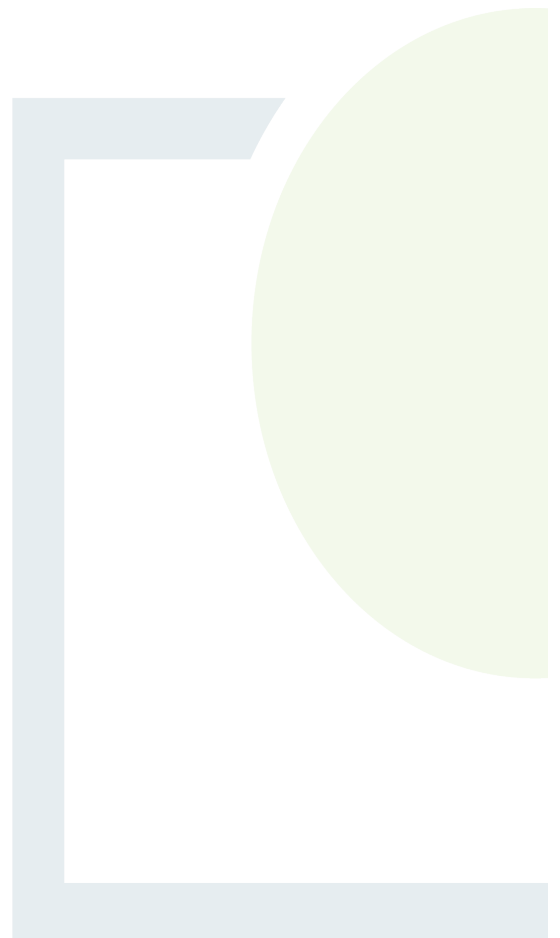


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5. EIA SCOPING AND CONSULTATION

5.1 Introduction

This chapter describes the consultation that was undertaken to inform the EIAR for the proposed Coumragappul Wind Farm. The consultation 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 consultation responses received and how these were addressed in the EIAR. The consultation process, scoping and pre-application consultation undertaken in respect of the Proposed Development are set out in this chapter. 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 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.”

Furthermore, public health guidance at the time was observed throughout with regard to the COVID-19 pandemic.

5.2 Scoping and Pre-Planning Consultation

5.2.1 EIA Scoping Consultation

The purpose of the EIA scoping process is to identify the key points and issues which are likely to be important during the Environmental Impact Assessment (EIA) of the 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 Project. Scoping was carried out having regard to the European Commission’s EIA Scoping Checklist (2017).

The requirement to consider cumulative effects is outlined in EU and national legislation. The EIA Directive requires the consideration of:

‘the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources’

A desk study was undertaken to identify other existing and proposed projects with which significant cumulative effects could plausibly occur. This was further informed by consultation.



Consultation was carried out throughout the development of the EIAR and through various wind farm design iterations. The list of consultees is provided in Table 5-1. 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.

Initial consultation commenced in August 2020 whereby consultees were invited to provide observations and comments in relation to an outline proposed development comprising 11 turbines. As the Project layout and design evolved commentary was again invited from consultees in August 2021 on the 10 turbine layout as per the current Planning Application.

Copies of the consultation responses received are included in Appendix 5.1 and are summarised in Table 5-2. Note where a consultee listed in Table 5-1 is not shown in Table 5-2 it is because no consultation response was received.



Table 5-1: List of Consultees

Type of Stakeholder	Body / Department
Waterford City and County Council	Planning Department Heritage Officer Environment Department Roads Department IT Department
Government Departments	Communications, Climate Action and Environment Housing, Planning, Community and Local Government Agriculture, Food and the Marine Culture, Heritage and the Gaeltacht Development Applications Unit (National Monuments Service) Development Applications Unit (Nature Conservation) Department of Defence Department of Transport, Tourism and Sport
NGOs & Stakeholders	An Taisce Birdwatch Ireland Fáilte Ireland Teagasc Environmental Protection Agency (EPA) Southern Regional Assembly Irish Farmers Association Irish Peatland Conservation Council The Heritage Council Sustainable Energy Authority of Ireland Inland Fisheries Ireland Irish Red Grouse Association National Trails Office South Eastern River Basin District Irish Wildlife Trust Irish Sports Council Commission for Energy Regulation Geological Survey of Ireland Health Service Executive Office of Public Works Transport Infrastructure Ireland Bat Conservation Ireland Irish Raptor Group Gas Networks Ireland Iarnróid Éireann Irish Water



Type of Stakeholder	Body / Department
	The Arts Council Údarás na Gaeltachta Waterways Ireland Irish Parachute Club
Aviation	Irish Aviation Authority An Garda Síochána IAA's Air Navigation Service Provider (ANSP) Waterford Airport Cork Airport
Telecommunications	Integrated Media Solutions (IMS) Arra Communications Ltd. Broadcasting Authority of Ireland – BAI BT Communications Ireland Ltd Digiweb Eir (Eircom) ESB Telecoms Imagine ITS Irish Networks Services Magnet Networks Munster Broadband Premier Broadband Ripplecom RTE/Saorview TETRA Ireland Ltd. Three TowerCom Ltd. Virgin Media Ireland Vodafone (Netshare) Wireless Connect Ltd. Commission for Communications Regulation



Table 5-2: Summary of Scoping Consultation Responses

Consultee	Date of Response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
Waterford City and County Council	18/05/2022	<p>Draft Waterford City and County Development Plan 2022-2028 - Regard should be had to the proposed designation of the subject site which appears to be in an exclusion zone for windfarm development in the Draft Waterford City and County Development Plan 2022-2028. Therefore, the draft zoning would not support a windfarm development at this location.</p> <p>Scale of the Development - WCCC has concerns regarding the scale of the proposed development - An acknowledgement that the 2006 Windfarm Guidelines would not have considered development of the proposed scale</p> <p>Landscape Sensitivity – The area is rated as sensitive and visually vulnerable in the Waterford County Development Plan 2011-2017 and most sensitive in the Draft Waterford City and County Development Plan 2022-2028. The EIA shall detail direct, indirect and in combination effects of the development in an area recognised for its high landscape and scenic amenity.</p> <p>Traffic & Transportation - The TM should address WCCC concerns in relation to construction traffic, oversized loads, passing bays and road damage particularly on the local roads.</p> <p>Haul routes- The EIA shall record the roadside/field boundary types and ecological corridors along proposed haul routes and assess how they will be impacted by transport of proposed wind energy infrastructure.</p> <p>Grid Connection - WCCC is currently not in favour of grid connections in the public road/ private company owning ducts / cables under the public road network. Alternative means of connection need to be considered .</p> <p>Hydrology - direct and indirect impacts on water quality from excavation and soil stability in an area of cut away peat shall be given particular attention as the upper reaches of the River Colligan are within a Blue Dot Catchment. The EIA needs to demonstrate how the proposed development will impact on the objectives for protection of Blue Dot Catchments under the Water Framework Directive.</p>	Considered Throughout EIA



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
		<p>Vernacular heritage features such as historic bridges, wells, mile markers and stone depots should be recorded and assessed for potential effects where they occur along haul routes.</p> <p>Consultation - Inclusion of Mountaineering Ireland and Waterford Hillwalking Groups could usefully be included in the list of consultees e.g. Comeragh Mountaineering Club, Kilmacthomas Walking Group, Dungarvan Hillwalking Club. The scope of the public consultation/ leaflet drop should be appropriately extended to reflect the rural nature of the surrounding environments and should consider parishes and townlands as opposed to 3km radius of the site.</p>	
Waterford City and County Garda Síochána	22/09/2020	Concerns regarding traffic implications from TDR on local and regional roads	Chapter 14 - Traffic and Transportation
Dungarvan Garda Síochána	09/08/2021	Acknowledged Receipt	N/A
<p>Department of Housing, Local Government and Heritage</p> <p>Development Applications Unit (National Monuments Service and Nature Conservation)</p>	24/09/2021	G Pre00207/2021 - It is the Department's view that a Natura Impact Statement (NIS) will be required. Provided guidance for the preparation of EIA. Response included observations and recommendations by the Development Applications Unit (DAU) related to Project planning and design, Project components, Ecological Data and Surveys, Ornithology, Bats, peat stability and storage, effects on surface waters and drainage, tree felling, opportunities for biodiversity enhancement, Watercourses and wetlands, Hedgerows, Scrub, grasslands and related habitats, Marsh Fritillary, Alien invasive species, Impact assessment, Construction Management Plans and Mitigation.	<p>Chapter 12 - Hydrology and Water Quality</p> <p>Chapter 11 - Soils, Geology and Hydrogeology</p> <p>Chapter 8- Biodiversity</p>
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	04/08/2021	Stated that the query does not fall under the remit of the Department but under the Department of Local Government, Housing and Heritage.	N/A
Transport Infrastructure Ireland (TII)	11/08/2021	TII set out general recommendations for the preparation of an EIA where the National Road Network may be affected and referred to TII guidelines and DMRB. Commentary relating to post-consent requirements were provided e.g. need for licenses, reinstatement of road pavement etc. Other commentary included:	Chapter 14 - Traffic and transportation



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
		<p>Access to the road network shall be developed in accordance with official policy and road safety considerations</p> <p>The developer should assess visual impacts from existing national roads.</p> <p>The developer should in particular have regard to any potential cumulative impacts.</p> <p>Clearly identify haul routes proposed</p> <p>Grid connection cable routing should seek to utilise the extensive existing local road network, or alternatives, as opposed to the strategic national road network contrary to the provisions of official policy.</p> <p>Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc.</p>	
The Heritage Council	04/08/2021	Acknowledged Receipt	N/A
Faillte Ireland	18/08/2021	Response included a copy of Fáilte Ireland's non-statutory guidelines for the Treatment of Tourism in an Environmental Impact Assessments (EIA). The guidelines are to be used by those conducting an EIA and compiling Environmental Impact Assessment Reports (EIAR).	Considered Throughout EIAR
Irish Water	20/08/2020	Irish water outlined general considerations they wish to follow in preparation of an EIAR.	Chapter 12 - Hydrology and Water Quality Chapter 17 - Material Assets, Telecommunications & Aviation
Southern Regional Assembly	05/08/2021	Acknowledged Receipt	N/A
Sustainable Energy Authority of Ireland	04/08/2021	Acknowledged Receipt	N/A
Irish Wildlife Trust	04/08/2021	Acknowledged receipt, however, does not have the capacity to consider or respond to all scoping / consultation requests.	N/A



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
Geological Survey Ireland (GSI)	23/08/2021	The Geological Survey had no specific comment or observations to make since the last response. Recommended using Geological Survey Ireland's Publicly Available data sets, when conducting the EIA, SEA, planning and scoping processes.	Chapter 9 - Land, Soils & Geology Chapter 10 – Hydrology & Water Quality Chapter 11 – Material Assets
Health Service Executive	04/08/2021	Stated the office has no involvement or expertise in relation to planning permissions. Provided alternative Environmental Health offices to contact.	N/A
Office of Public Works	04/08/2021	Auto-response	N/A
Bat Conservation Ireland	04/08/2021	Bat Conservation Ireland stated that they do not have the administrative capacity to review planning applications. Advised to ensure that bat surveys are undertaken according to best practice guidelines.	N/A
Údarás na Gaeltachta	04/08/2021	Acknowledged Receipt	N/A
Waterways Ireland	13/08/2020	Acknowledged Receipt	N/A
Irish Aviation Authority	24/08/2020	In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to: (1) agree an aeronautical obstacle warning light scheme for the wind farm development, (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection	Chapter 17 - Material Assets, Telecommunications & Aviation
IAA's Air Navigation Service Provider (ANSP)	09/09/2020	The location of the proposed windfarm being 38.92NM from Cork Airport does not affect the flight or ATM procedures for Cork. For Waterford the proposed location being 20NM from the airport should not impact flight procedures, however this will need to be addressed by Waterford.	Chapter 17 - Material Assets, Telecommunications & Aviation



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIA where Key Points Raised are Addressed
		The turbines, when constructed will need to be recorded as obstacles, which may also require a survey to verify their elevations in consultation with this Regulatory inspectorate.	
Waterford Airport (was consulted originally through ANSP, but again in 2023 due to new runway)	14/02/2023	No comment on the proposed development at this time. Requested to be informed if there are any changes to the current proposal.	Chapter 17 - Material Assets, Telecommunications & Aviation
Dublin Airport	09/08/2021	No impact. No comment	N/A
Integrated Media Solutions (IMS)	04/08/2021	Acknowledged Receipt by Email, no further response	N/A
Broadcasting Authority of Ireland - BAI	09/08/2021	The BAI does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed windfarms are not located close to any existing or planned FM transmission sites.	Chapter 17 - Material Assets, Telecommunications & Aviation
BT Communications Ireland Ltd	23/08/2021	No potential for interference - no infrastructure within the area of the proposed wind farm.	Chapter 17 - Material Assets, Telecommunications & Aviation
Digiweb	13/08/2020	Acknowledged Receipt by Email, no further response	N/A
Eir (Eircom)	05/08/2021	No transmission services that will be affected by this proposed wind farm.	Chapter 17 - Material Assets, Telecommunications & Aviation
ESB Telecoms	28/09/2020	The development will have no impact to ESB Networks Point to Point and Point to Multipoint Radio network.	Chapter 17 - Material Assets, Telecommunications & Aviation
ITS Irish Networks Services	18/08/2020	No impact.	Chapter 17 - Material Assets, Telecommunications & Aviation



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIA R where Key Points Raised are Addressed
Magnet Networks	13/08/2020	Acknowledged Receipt by Email, no further response	N/A
Munster Broadband	13/08/2020	Acknowledged Receipt by Email, no further response	N/A
TETRA Ireland Ltd.	07/01/2022	No potential for interference	Chapter 17 - Material Assets, Telecommunications & Aviation
Three	15/12/2021	Three Ireland have no Microwave transmission links that could potentially be affected	Chapter 17 - Material Assets, Telecommunications & Aviation
Virgin Media Ireland	09/08/2021	No potential for interference VM B2B services.	Chapter 17 - Material Assets, Telecommunications & Aviation



5.2.2 Pre-Planning Meetings

Waterford City and County Council

Two pre-planning consultation meetings were held with Waterford City and County Council on 08th September 2021 and 28th April 2022.

The initial meeting was to introduce the Proposed Development to the Council. Discussion centred primarily around the type and level of public consultation being carried out. It was noted also by the Council that they see water quality and hydrology as key environmental receptors for the Proposed Development.

The Council identified the following considerations during the second meeting:

- the draft Wind Energy Strategy is under review
- the EIAR noise assessment should have regard to the 2019 Draft Wind Energy Guidelines
- the EIAR should provide a robust assessment of alternatives in relation to LVIA and turbine height
- EIAR to include Traffic Management Plan
- alternative options for placing grid connection cable in regional roads to be assessed

An Bord Pleanála

Three pre-application meetings were held with An Bord Pleanála under Section 37B of the Planning and Development Act 2006 as amended as follows:

- First meeting 22nd April 2021
- Second meeting 25th May 2022
- Third meeting 18th November 2022

Copies of the meeting minutes are included in Appendix 5.1.

5.3 **Community Consultation and Public Information Events**

EMPower has consulted with the local community from the beginning of the detailed design and environmental assessment phases of the Proposed Development (in 2019) to ensure that the views and concerns of members of the local community and interested stakeholders were considered as part of the Project's design and the Environmental Impact Assessment process.

The community consultation approach initially focused on the near neighbours and dwellings within 2km of the Proposed Development. This consultation area represents the closest communities, proximity wise, and will therefore be more susceptible to any potential effects caused by the Proposed Development. This consultation area was widened to 3km following feedback from Waterford City and County Council.

Interested stakeholders further away from the Proposed Development were also informed as the design iterations were worked through and the details evolved. This was achieved by Project website updates and live interactive public webinars. The Project webinars were advertised beforehand in local newspapers, via project newsletters and on the Project website. Public information evenings were also held, when public health guidelines permitted, which again were advertised in local newspapers, the Project's website, and newsletters.



A detailed Community Consultation report is included in Appendix 5.2 and a summary of consultation is provided in Table 5-3.

Table 5-3: Community Consultation

Timeline	Action
2019	<ul style="list-style-type: none"> • Dedicated Project Website Goes Live – www.coumnagappulwindfarm.ie • First Project Information Newsletter distributed 2km radius (44 Eircode’s) • First Project Community Letter distributed 2km radius (44 Eircode’s) • The project’s first In Person Project Information Event was hosted on 21/08/2019 – All interested Stakeholders.
2020	<ul style="list-style-type: none"> • Second Project Information Newsletter distributed 2km radius (44 Eircode’s) • Second Project Community Letter distributed 2km radius (44 Eircode’s) • First Project Design Online Webinar – All interested Stakeholders
2021	<ul style="list-style-type: none"> • Third Project Information Newsletter distributed 2km radius (44 Eircode’s) • Third Project Community Letter distributed 2km radius (44 Eircode’s) • Second Online Design Webinar was hosted on 01/06/2022– All interested Stakeholders
2022	<ul style="list-style-type: none"> • September 2022 Project Information Newsletter distributed to a 3-kilometer radius (108 Eircode’s) • September 2022 Project Community Letter distributed to a 3-kilometer radius (108 Eircode’s) • Design Online Webinar was hosted on 05/10/2022– All interested Stakeholders • The project’s second In Person Project Information Event was hosted on 12/10/2022 – All interested Stakeholders • December 2022 Project Information Newsletter distributed to a 3-kilometer radius from the projects Study Area. (108 Eircode’s) • December 2022 Project Community Letter distributed to Immediate consultation zone (108 Eircode) • December 2022 Projects Online Virtual Exhibition Room Opened: https://tours.innovision.ie/v/NkixJYoa1lQ
<ul style="list-style-type: none"> • 2023 	<ul style="list-style-type: none"> • April 2023: Fifth Project Information Newsletter distributed to a 3-kilometer radius from the projects Study Area (108 Eircode’s), Fifth Project Community Letter distributed to Immediate consultation zone (108 Eircode’s), the project’s third In Person Project Information Event was hosted on 26/04/2023 – All interested Stakeholders • October 2023: Fifth Project Information Newsletter distributed to a 3-kilometer radius from the projects Study Area, Fifth Project Community Letter distributed to Immediate consultation zone, The project’s third In Person Project Information Event was hosted on 26/04/2023 – All interested Stakeholders



5.4 Conclusion

Consultation was carried out with a number of stakeholders, including Waterford City and County Council, Government Departments, Non-Governmental Organisations, telecommunications providers, aviation organisations and local residents. Their comments and feedback were incorporated into the Project design iterations and to the assessments conducted in the EIAR.

Pre-planning consultation was held with Waterford City and 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 Waterford City and County Council during the scoping exercise which informed various aspects of the EIAR assessment as well as the scope of community consultation.

The public consultation was facilitated over four years. Public consultation meetings were hosted both online and in person which were advertised on the Project website and also by engaging with local newspapers and representatives and invitations sent by post to nearby dwellings which included updates on the Proposed Development. The purpose of these events was to engage with the wider community and present detailed information as the Project progressed. Project Information Newsletters were also distributed.

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 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 Development.

Observations and submissions received during the scoping and consultation process have informed the design, assessment and mitigation measures proposed as part of this Project as set out throughout this EIAR.



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