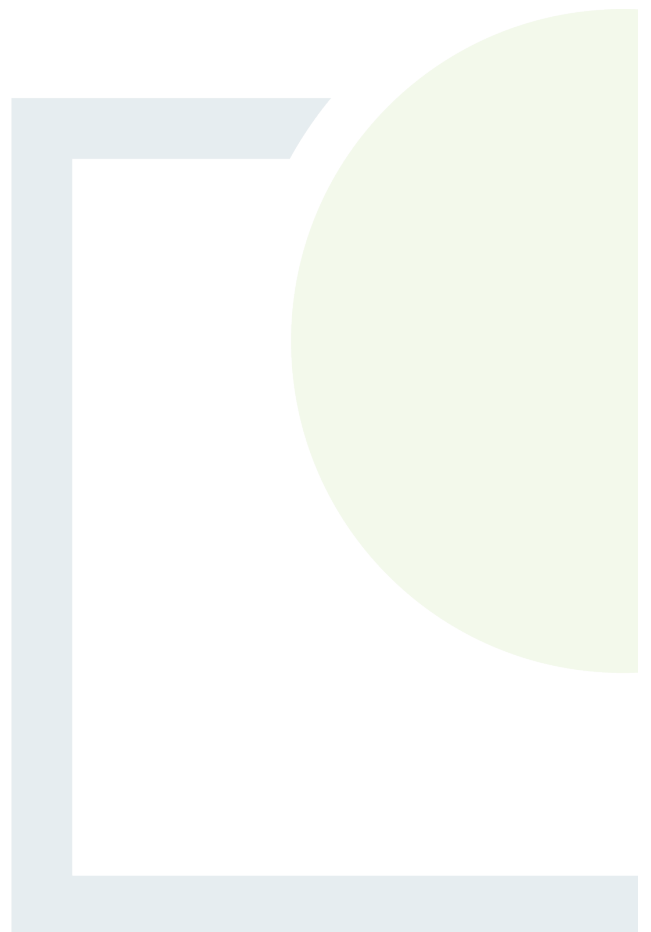




CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE
& PLANNING

APPENDIX 5.1

Scoping Consultation





Rita Mansfield
Fehily Timoney and Company
Core House
Pouladuff Road
County Cork
T12 D773

23 August 2021

Re: Coumnagappul Wind Farm North of Dungarvan and Kilbrien Co. Waterford

Your Ref: P2360/Lett/RM/MG
Our Ref: 21/288 [cf.20/192]

Dear Rita,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIA, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your letter dated 03 August 2021, concerning the proposed Coumnagappul Wind Farm North of Dungarvan and Kilbrien Co. Waterford, Geological Survey has no specific comment or observations to make on this matter at this time since our last response. We are grateful to be given the opportunity, and we would welcome the opportunity to make more specific comments once more detail of the scheme is made available as the project progresses. In the mean time we would recommend the use of our data sets available on our website.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.

An Garda Síochána

An tÁrd - Cheannfort,
An Garda Síochána,
Port Láirge X91 A076
Teileafón/Tel: 051-305311
Facs/Fax: 051-305381



Chief Superintendent,
An Garda Síochána,
Waterford X91 A076

Láithreán Gréasain/Web Site: www.garda.ie
Ríomh-phoist/Email: waterford_dv@garda.ie

Bí linn/Join us



WDDV_8-364643/20

Fehily Timoney and Company
Core House,
Pouladuff Road
Cork
T12 D773

**RE: Proposed Coumnagppul Wind Farm Environmental Impact Assessment Report –
Scoping and Consulation Request**

Dear Sir/Madam,

With reference to the above, I wish to comment as follows:

Proposed Turbine Delivery Route – Figure 2.2

There is concern around the effect deliveries of the Turbines will have on traffic on the routes.


1.The junction of R666 and N72 at Lismore is on a bridge and traffic will have to be stopped to facilitate any oversized load carry out the left hand turn on to the N72

2.The L1041 is a local road connecting the R672 at Bearys Cross with Kilbrien and consists of a number of sharp bends ordinarily two cars can pass each other on the road but nothing larger. The locals use the road to access the R672.

3. To access the main site entrance at Coumnagappul all traffic must turn left at Scart Bridge. This road is a narrow road and is in fact a dead end. Two cars cannot pass each other on sections of this road. Although a narrow rural road, it is the access and egress to 4 farms and a number of private residents. The fact that it is a dead end could have traffic implications for the residents.

I hope you will consider the above comments in your plans.

Yours sincerely,



Michael D. Leacy Superintendent
Acting Chief Superintendent
21st of September 2020

From: [Dawn Quinn](#)
To: [Counmagappul Wind Farm](#)
Subject: RE: Stakeholder Consultation for Development Application
Date: Wednesday 4 August 2021 14:45:17
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Dear Marie,

Thank you for your e-mail.

Bat Conservation Ireland is a small wildlife charity. As a consequence, we do not have the administrative capacity to review planning applications.

Please ensure that bat surveys are undertaken according to best practice guidelines.

Yours sincerely,

Bat Conservation Ireland

From: Counmagappul Wind Farm <Counmagappul@ftco.ie>
Sent: Wednesday 4 August 2021 13:10
To: Dawn Quinn <admin@batconservationireland.org>
Subject: Stakeholder Consultation for Development Application

Dear Sir/Madam,

Counmagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

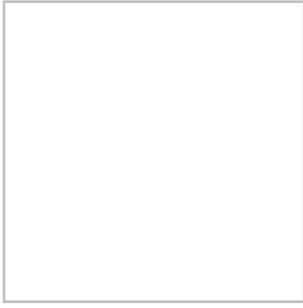
Counmagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Counmagappul@ftco.ie

Kind Regards,

Marie Geary
for Rita Mansfield
for and on behalf of **Fehily Timoney and Company**

Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 9560
www.fehilytimoney.ie



This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

From: gis.ireland@bt.com
To: [Cumnagappul Wind Farm](#)
Subject: RE: Stakeholder Consultation for Development Application
Date: Monday 23 August 2021 11:08:59
Attachments: [image002.jpg](#)
[image003.png](#)
[image004.png](#)

Hi,

BT Ireland have no infrastructure within the area of the proposed wind farm.

Kind Regards,

GIS Team

From: Cumnagappul Wind Farm <Cumnagappul@ftco.ie>
Sent: 04 August 2021 11:39
To: GIS Ireland G <gis.ireland@bt.com>
Subject: Stakeholder Consultation for Development Application

Dear Sir/Madam,

Cumnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Cumnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Cumnagappul@ftco.ie

Kind Regards,

Jennifer O'Hanlon
for Rita Mansfield
for and on behalf of Fehily Timoney and Company



Jennifer O'Hanlon
Administrator

Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 9573
www.fehilytimoney.ie

This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

From: [Stephen Diarmuid Walsh](#)
To: [Counmagappul Wind Farm](#)
Cc: [Jane Roche](#)
Subject: DAA Observation - Proposed Counmagappul Wind Farm
Date: Monday 9 August 2021 15:36:53
Attachments: [image001.jpg](#)

Good afternoon,

Thank you for sending the proposed Counmagappul Wind Farm Environmental Impact Assessment Report – scoping & consultation request. daa has no comment to make in respect of this consultation.

Kind Regards,

Stephen



.....
Stephen Walsh, Statutory Planner, Infrastructure
Level 1, Cloghran House, Dublin Airport
M: +353-86-3350783
Email: stephen.diarmuid-walsh@dublinairport.com
.....

Document Classification: Class 1 - General

daa proudly supporting Feed Our Homeless, St. Francis Hospice and The Mater Foundation. The daa Charities for 2020. **DISCLAIMER:** The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended Recipient(s). If you are not the intended recipient(s) of this email, you must not use, disclose, copy, distribute or retain this message, the attachment(s) or any part thereof. If you believe that you have received this email in error, please notify us immediately. Please also delete all copies of this email and any attachment(s) from your computer system. Unless expressly stated, this email is not intended to create any contractual relationship. If this email is not sent in the course of the senders employment or fulfilment of his/her duties to daa, daa accepts no liability whatsoever for the content of this message or any attachment(s). daa plc. Registered office: Dublin Airport, Co. Dublin. Registered Number: 9401 Ireland. **SÉANADH:** Tá an fhaisnéis sa ríomhphost seo agus i gceangaltáin ar bith faoi rún agus tá sé d'aird agus d'úsáid an Fhreagróra (na bhFreagróirí) dá bhfuil sé ceaptha amháin. Más rud é nach tusa an freagróir (na freagróirí) dá bhfuil an ríomhphost seo ceaptha, ní chheadaítear duit an teachtaireacht, an ceangaltá(i)n nó cuid ar bith dó a úsáid, a nochtadh, a chóipeáil, a scaipeadh nó a choinneáil. Má chreideann tú go bhfuair tú an ríomhphost seo trí earráid, bheimis buíoch dá gcuirfeá é sin in iúl dúinn láithreach. Scríos gach cóip den ríomhphost seo agus ceangaltá(i)n ar bith ó chóras do ríomhaire chomh maith le do thoil. Mura bhfuil sé luaite go sainráite, níl sé beartaithe leis an ríomhphost seo caidreamh conarthach ar bith a chruthú. Murar seoladh an ríomhphost seo i gcúrsaí fhostaíocht an tseoltóra nó i gcomhlíonadh a dhualgas/a dualgas ní ghlacfaidh daa dliteanas ar bith as ábhar na teachtaireachta nó ceangaltá(i)n ar bith. daa cpt. Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire.

From: [Aisling O'Sullivan](#)
To: [Rita Mansfield](#)
Cc: [Lee-Ann McGrath](#)
Subject: RE: Coumnagappul Wind Farm SID EIAR Scoping Comments from WCCC
Date: Wednesday 18 May 2022 10:21:10

Dear Rita ,

Please find below Coumnagappul Wind Farm SID EIAR Scoping Comments from WCCC

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.

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

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 EIAR shall detail direct, indirect and in combination effects of the development in an area recognised for its high landscape and scenic amenity.

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.
- **Haul routes-** The EIAR 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.

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 .

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 EIAR shall detail direct, indirect and in combination effects of the development in an area recognised for its high landscape and scenic amenity.

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 EIAR needs to demonstrate how the proposed development will impact on the objectives for protection of Blue Dot Catchments under the Water Framework Directive.

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.

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.

The above comments should be taken into consideration

Regards

Aisling O'Sullivan | Senior Executive Planner

Waterford City & County Council, Civic Offices, Dungarvan, Co Waterford

From: [John Bagnall](#)
To: [Counmagappul Wind Farm](#)
Cc: [Mobile Networks TXN](#)
Subject: Re: Stakeholder Consultation for Development Application
Date: Thursday 5 August 2021 08:01:31
Attachments: [image001.jpg](#)
[image006.png](#)
[image007.png](#)
[image.png](#)

Hi Jennifer,

Please find analysis for the Eir Mobile and Eir fixed network links below.

We have no transmission services that will be affected by this proposed wind farm.

Please keep sending future windfarm development analysis and large infrastructure project requests to MobileNetworksTXN@eir.ie for Eir Mobile and OpenEir microwave. Best of luck with the project.

image.png



Kind regards,



John Bagnall

Transmission Design & Engineering

M: +353 85 1053746

E: john.bagnall@eir.ie

Address: EirCode - D24 HX03

On Wed, 4 Aug 2021 at 11:47, Paul Marron <paul.marron@eir.ie> wrote:

Hi Jennifer,

I'm going to pass you on to my colleague John Bagnall, he will assess the proposal against the eir mobile microwave network and respond to you.

Regards,

Paul

----- Forwarded message -----

From: **Coumnagappul Wind Farm** <Coumnagappul@ftco.ie>
Date: Wed, 4 Aug 2021 at 11:44
Subject: Stakeholder Consultation for Development Application
To: Paul.Marron@eir.ie <Paul.Marron@eir.ie>

Dear Sir/Madam,

Coumnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Coumnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Coumnagappul@ftco.ie

Kind Regards,

Jennifer O'Hanlon

for Rita Mansfield

for and on behalf of Fehily Timoney and Company



Jennifer O'Hanlon
Administrator

Fehily Timoney and Company

Core House, Pouladuff Road, Cork, T12 D773

t: +353 21 496 9573

www.fehilytimoney.ie

This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

--

Paul Marron

Transmission Engineer

Eir Mobile Networks

2022 Bianconi Ave, Citywest, Dublin 24.

www.eir.ie

Mobile: 0876548499 | **Email:** paul.marron@eir.ie

The information contained in this e-mail and any files transmitted with it is confidential and may be subject to legal professional privilege. It is intended solely for the use of the addressee(s). If you are not the intended recipient of this e-mail, please note that any review, dissemination, disclosure, alteration, printing, copying or transmission of this e-mail and/or any file transmitted with it, is prohibited and may be unlawful. If you have received this e-mail by mistake, please promptly inform the sender by reply e-mail and delete the material. Whilst this e-mail message has been swept for the presence of computer viruses, eir does not, except as required by law, represent, warrant and/or guarantee that the integrity of this communication has been maintained nor that the communication is free of errors, viruses, interception or interference.

eircom Limited, Registered as a Branch in Ireland Number 907674. Incorporated in Jersey Number 116389. Branch Address: 2022 Bianconi Avenue, Citywest Business Park, Dublin 24, D24 HX03, Ireland.

From: [planning applications](#)
To: [Coumnagappul Wind Farm](#)
Subject: RE: Stakeholder Consultation for Development Application
Date: Wednesday 18 August 2021 12:47:37
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.jpg](#)
[image010.png](#)
[image011.png](#)
[Fáilte Ireland EIAR Guidelines.pdf](#)

Hello Marie,

Thank you for your email regarding the proposed Coumnagappul Wind Farm Environmental Impact Assessment Report – Scoping and Consultation Request.

Please see attached the updated copy of Fáilte Ireland’s Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86

T +353 (0)1 884 7224 | M +353 (0) 860357590 | www.failteireland.ie



From: Coumnagappul Wind Farm <Coumnagappul@ftco.ie>
Sent: Wednesday 4 August 2021 12:37
To: planning applications <planning.applications@failteireland.ie>
Subject: Stakeholder Consultation for Development Application

[ATTENTION] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

Coumnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Coumnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see

attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Coumnagappul@ftco.ie

Kind Regards,

Marie Geary
for Rita Mansfield
for and on behalf of **Fehily Timoney and Company**



Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 9560
www.fehilytimoney.ie

This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled. Privileged, confidential and/or copyright information may be contained in this E-Mail. This E-Mail is for the use of the intended addressee. If you are not the intended addressee, or the person responsible for delivering it to the intended addressee, you may not copy, forward, disclose or otherwise use it or any part of it in any way whatsoever. To do so is prohibited and may be unlawful. If you receive this E-Mail by mistake, please advise the sender immediately by using the REPLY facility in your E-Mail software and delete all associated material immediately.

From: MACCRIOSTAIL Cathal
To: Crystal Leiker; BYRNE Jonathan; OLOUGHLIN Charlie; planning@daa.ie; aidan.power@waterfordairport.ie
Cc: Coumnagappul Wind Farm; O'SULLIVAN Jamesie; WALSH Enda; DEANE Sharon; O'SULLIVAN Stephen
Subject: FW: P2360 - Coumnagappul Wind Farm EIAIAR - Scoping request from IAA
Date: Wednesday 9 September 2020 10:25:07
Attachments: [image007.png](#)
[image008.png](#)
[image009.png](#)
[d364cb49-d678-4fa1-a6a2-300a3e1f49a3.png](#)
[image003.iq](#)
[Scoping Report\(-\).pdf](#)
[P2360 Scoping Response IAA.pdf](#)
Importance: High

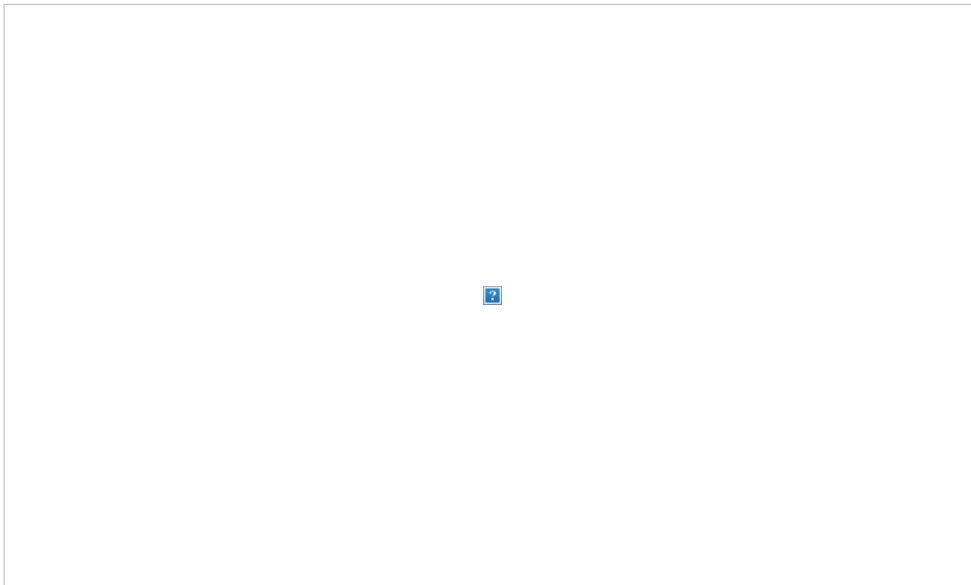
Dear Crystal,

Thanks you for the correspondence and the relevant attachments for reference.

From an Air Traffic Management(ATM) perspective, I've taken the maximum elevation from the table provide which gives an AMSL value of 618M=2028feet.

The location of the proposed windfarm being 38.92NM from Cork Airport does not affect the flight or ATM procedures for Cork(see below). For Waterford the proposed location being 20NM from the airport should not impact flight procedures, however this will need to be addressed by Waterford.

Caveat: This is an opinion on my part and may not be acceptable to the Regulatory PANS-OPs and Airspace Inspectorate(copied), without a formal assessment being conducted by an approved organisation. In addition these 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.



Kind regards,

Cathal
Cathal Mac Criostail
Údarás Eitlíochta na hÉireann / Irish Aviation Authority
The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449, Ireland
[✉ cathal.maccriostail@iaa.ie](mailto:cathal.maccriostail@iaa.ie)
[☎ +353 \(0\)1 6031173](tel:+353016031173)
[☎ +353 \(0\)86 0527130](tel:+3530860527130)
[🌐 www.iaa.ie](http://www.iaa.ie)



From: Crystal Leiker <crystal.leiker@ftco.ie>
Sent: Wednesday 9 September 2020 08:15
To: MACCRIOSTAIL Cathal <Cathal.MacCriostail@IAA.ie>; BYRNE Jonathan <Jonathan.Byrne@IAA.ie>; OLOUGHLIN Charlie <Charlie.OLOUGHLIN@IAA.ie>; planning@daa.ie; aidan.power@waterfordairport.ie
Cc: Coumnagappul Wind Farm <Coumnagappul@ftco.ie>
Subject: P2360 - Coumnagappul Wind Farm EIAIAR - Scoping request from IAA

* This message originated from outside the Irish Aviation Authority. Please treat hyperlinks, attachments and instructions in this email with caution. *

Dear Sir/Madam,

On 13th August 2020, Fehily Timoney issued a scoping report for the proposed Coumnagappul Wind Farm in Lagg, Co. Waterford to the Irish Aviation Authority. On 24th August, 2020, FT received a response from the IAA requesting that we liaise with you to "undertake a preliminary screening assessment to confirm that the proposed wind farm and the associated cranes that would be utilised during its construction would have no impact on instrument flight procedures, communication and navigation aids or flight checking at either Cork Airport or Waterford Airport."

Please find attached the letter we received from the IAA and the Scoping Report for the above named project. We would be grateful for a response as soon as possible. Please respond to Coumnagappul@ftco.ie, cc'd on this email.

Current turbine locations in our design are listed below in ITM:

		Ground	
--	--	--------	--

Turbine No	ITM Coordinates	Elevation (Malin Head OD)	Height of Turbine
T1	623116, 609301	296	160m
T2	624054, 609887	412	160m
T3	624617, 610036	392	160m
T4	623727, 609268	370	160m
T5	624989, 609638	411	160m
T6	624278, 609354	332	160m
T7	624817, 608984	354	160m
T8	624392, 608481	273	160m
T9	625223, 608616	458	160m
T10	624686, 607898	256	160m
T11	625248, 607863	303	160m

Yours sincerely,



Crystal Leiker
Project Planner

Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 9519/ +85 8152 383
www.fehilytimoney.ie

This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

PLEASE consider the environment; PRINT ONLY when necessary! **DISCLAIMER:** This message contains information that is confidential, may be privileged and is the property of The Irish Aviation Authority (IAA). If you are not the intended recipient, you may not use this email or the information it contains. If you are not the intended recipient please notify the sender immediately and delete all copies of this message. Thank you. This email message has been swept for the presence of computer viruses. Internet Emails are not necessarily secure. The IAA accepts no responsibility for malicious content such as viruses or for changes made to this message after it was sent. Registered Office: The Times Building, 11-12 D'Olier Street, Dublin 2. D02 T449 Registered Number: 211082 Place of Registration: Ireland A limited liability company



Our Ref: G Pre00207/2021
Your Ref: P2360/Lett/RM/MG

(Please quote in all related correspondence)

24th September 2021

Fehily Timoney and Company,
Core House,
Pouladuff Road,
County Cork,
T12 D773

Via email: Counagappul@ftco.ie ; marie.geary@ftco.ie

**Pre Planning: EMPower for a renewable energy development referred to as the
Counagappul Wind Farm: located between Ballymacarbry and Lemybrian in
County Waterford**

A chara

I refer to initial letter of 4th August 2021 in connection with the above pre-planning
consultation.

Outlined below are heritage-related observations/recommendations co-ordinated by the
Development Applications Unit under the stated headings

Nature Conservation

The Department notes the detailed scoping document provided which sets out the key
issues to be considered in the EIAR. Based on the information currently available about
the location of the proposed development, it is the Departments view that a Natura Impact
Statement (NIS) will also be required.

As an initial response to your consultation, you are advised to consult the 'Planning' section
of the NPWS website - <https://www.npws.ie/development-consultations> - as this contains
text/advice on consulting NPWS in relation to 'development applications', data and
information sources, and the basic elements of environmental assessments that may be
required.



The following scoping comments are made in the context of this Department's role in relation to nature conservation. The observations are intended to assist you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal. Data collected and surveys carried out in connection with this proposed development may raise other issues that have not been considered here. The observations are not exhaustive and are made without prejudice to any recommendation that may be made by this Department in the future.

The proposed development site adjoins the Comeragh Mountains Special Area of Conservation, site code 0001952. The qualifying interests of this SAC are: Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*) [3110], Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation [3260], Northern Atlantic wet heaths with *Erica tetralix* [4010], European dry heaths [4030], Alpine and Boreal heaths [4060], Blanket bogs [7130], Siliceous scree of the montane to snow levels (*Androsacetalia alpinae* and *Galeopsietalia ladani*) [8110], Calcareous rocky slopes with chasmophytic vegetation [8210], Siliceous rocky slopes with chasmophytic vegetation [8220] and *Hamatocaulis vernicosus* (Slender Green Feather-moss) [6216]. Any works that could have an adverse impact on the SAC are of concern and must be fully assessed by the EIAR and Natura Impact Statement. Apart from potential impacts on the adjoining designated SAC, aerial imagery of the site suggests clear similarity between some of the proposed development site and habitats within Comeragh Mountains SAC. Therefore detailed habitat assessment should be carried out to clarify whether the qualifying interest habitats for which the SAC is designated also occur in the proposed development area and whether they or other habitats present have a supporting role in maintaining the favourable conservation status of the habitats and species for which the adjoining SAC is designated. The EIAR and NIS should also assess whether the site could have a future role in supporting the achievement of favourable conservation status for the qualifying interest habitats of Comeragh Mountains SAC and what influence the proposed development would have on this.

The EIAR should consider the conservation value of the habitats present on the site particularly any habitats listed in Annex I of the Habitats Directive and their national conservation status and the trend in that status.

The EIAR should take account of Objective 1 of the National Biodiversity Action Plan which is to mainstream biodiversity into decision-making across all sectors and Action 1.1.3 is that "all public authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure". In this context this Department would suggest that any loss of habitat if it is to proceed should be mitigated for by the provision or enhancement of habitat elsewhere. The EIAR should also consider Article 10 of the EU Habitats Directive



insofar as it relates to features which function as stepping stones for wild species in the landscape.

Please find below some general scoping comments for EIAR, appropriate assessment screening and appropriate assessment/NIS, and for licensing requirements which may assist.

Guidance on EIAR

You are advised to consult the European Commission's (2017) 'Environmental Impact Assessment: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)'. Any surveys and assessments should be based on a full details of the overall project, noting all lands that will be required. For a detailed list of potential considerations, see the 'Review checklist', and specifically 'Section 1 – Description of the project', in this guidance. Note also that if compensatory afforestation is required on other lands, the likely significant effects of that integral element of the development should be assessed in the main project EIAR.

The following should also be taken into account in planning and designing a wind farm and in completing the assessments.

Please note the 2020 updates of the Guidance documents:

- *Guidance document on wind energy developments and EU nature legislation* (European Commission, **2020**)
- *Draft Revised Wind Energy Development Guidelines* (DoHLGH, **2020**), particularly the requirements in relation to assessing ground conditions/geology (section 5.3)
- *Landslides in Ireland* (GSI, 2006)¹.

Project planning and design

It should be remembered that a key element of EIA is the avoidance or reduction of negative effects on the environment. EIA is an iterative process and the information gathered through assessments or surveys should be used to guide the planning and design of the wind farm so that sensitive ecological or hydrological areas are avoided, and negative impacts are minimised insofar as is possible. The size, layout and design of the proposed development should be informed by a constraints-type study and the compilation of an environmental constraints map that identifies and avoids, insofar as is possible and using appropriate separation distances, all nature conservation sites, other sensitive ecological and hydrological features, deep or intact peat deposits, and areas of wet and/or active bog, pool systems and flushes.

The National Biodiversity Action Plan 2017- 2021 aims to conserve and restore Ireland's biodiversity. A key objectives of the plan is to achieve; no net contribution to biodiversity loss arising from development projects occurring within the lifetime of the plan. Accordingly,

¹ Creighton, R. (ed.). 2006. *Landslides in Ireland: A Report of the Irish Landslide Working Group*. Geological Survey of Ireland, Dublin.



the EIAR should outline how this project will avoid a net loss of biodiversity and include relevant mitigation and or compensatory measures where necessary.

Project components

In general, the EIAR should include sufficient project details so that the full nature and extent of the likely significant effects are clear and assessed fully in relation to, among other things, road design and construction methodology; site drainage details, including settlement ponds; temporary and permanent storage or disposal areas for peat and other materials or wastes arising; extraction sites/borrow pits; and any modifications to roads, bridges or culverts along the entire length of haul routes. Volumes of surplus material arising and of fill required should be calculated. Due consideration should also be given to the grid connection.

The Department notes that the location map indicates the site may include areas of peatland and areas under coniferous forest cover. The EIAR should give specific consideration to the mobilisation of silt and changes to the stability of peat. The proposed windfarm has the potential for significant changes in patterns of surface water flow and may desiccate the peat allowing pathways to open up resulting in subsurface water losses. It should be noted that in 2020 a number of major upland peatland (blanket bog) landslides occurred across Ireland, most notably on Shass Mountain near Drumkeeran in County Leitrim² and Meenbog, near Ballybofey in County Donegal. The Peat Stability Risk Assessment must be considered in light of these occurrences with consideration of climate change predictions (e.g. rainfall level) in the hazard rating and should thoroughly assess risk with regard to change in weather patterns due to climate change such as more frequent and intense storms and rainfall events, increased likelihood and magnitude of river flooding, prolonged periods of dry conditions which may increase the likelihood of unstable peat.

Detailed consideration should be given to the amount of peat to be excavated, stored, and disposed/recovered. A detailed plan for the safe storage, disposal and rehabilitation of excavated or disturbed peat should form part of the EIAR. The spreading or recovery of excavated peat on areas of intact bog, wet and re-vegetated areas of cutover bog or other habitats or vegetation of ecological value is unlikely to be acceptable. Excavated or exposed peat should not pose any threat to surface waters and water quality. Any proposals to combine peat disposal with habitat restoration or rehabilitation measures will require a detailed plan to show the location, nature and area of lands in question, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting. This plan should be prepared by a suitably qualified ecologist in consultation with hydrologists and other experts as appropriate.

² <https://www.npws.ie/news/shass-mountain-peat-landslide-report-published>



A detailed site drainage map will be required and should show all existing watercourses, drainage ditches, flushes, lakes or ponds; new drainage ditches; all outfall points to watercourses or lakes; and all settlement ponds. The EIAR must demonstrate that the proposed wind farm development will not pose any threat to surface waters and associated species (e.g. Salmon). Any impact on water table levels or groundwater flows may impact on wetland sites some distance away. The EIAR should assess cumulative impacts with other plans or projects, if applicable. Where negative impacts are identified suitable mitigation measures should be detailed as appropriate.

The associated impacts of quarrying or extraction should be included among the considerations at the earliest stages of project planning and design, and should be assessed fully in the EIAR. Reinstatement or restoration plans will be required for any quarries or borrow pits on-site and should be included in the EIAR. As with any other part of the development, all borrow pits (existing or proposed) to be used in construction should be included within the application area for the proposed development.

Any tree felling of forested sites should be included as an intrinsic element of the overall development, the impacts and implications of which should be assessed fully in the EIAR. The extent of tree felling should be mapped, and the future use and management of all cleared areas should be specified. The impacts of tree felling on wildlife, habitats and surface waters (e.g. water quality) should be assessed fully, including the risk of Phosphate mobilisation from peat soils as a result of tree clearance and ground disturbance

Tree felling is licensed and regulated by the Forest Service; any additional requirements in respect of this element of the proposed development, including any obligations to replant on other lands, should be made known at the planning application stage, and assessed as part of the EIAR as appropriate. If restoration of planted areas is proposed as mitigation or compensation for negative ecological effects, the EIAR should include a detailed plan to show the location, nature and area of habitat to be reinstated, and provide details of how such areas will be reinstated, managed and improved for habitats and/or species, together with proposals for monitoring and reporting. This plan should be prepared by a suitably qualified ecologist in consultation with other experts as appropriate. Consideration should be given within this context of no net loss to biodiversity and with that opportunities for establishment of native woodland as replacement planting rather than coniferous planting. The likely impacts of grid connection, particularly for birds, sensitive habitats and surface waters, should be given due consideration at the EIA stage.

Any improvement or reinforcement works required for access and transport anywhere along the proposed haul route(s) should be included in the EIAR and subjected to ecological impact assessment with the inclusion of mitigation measures, as appropriate. Any losses of biodiversity habitat associated with this proposed development (including access roads and cabling etc.) such as woodland, scrub, hedgerows and other habitats should be mitigated for. In addition, Annex 1 habitats which occur outside the Natura 2000



network are important in terms of biodiversity conservation. The presence of any Annex I habitats outside the network should be given due consideration as part of the consideration of biodiversity matters generally for the proposed development. The loss of Annex 1 habitats outside SACs should be avoided wherever possible. Impacts of lighting on-site should also be assessed noting that lighting of turbines and masts can increase collision risk³.

Alternative options for the site should also be included in the EIAR and this should include the opportunities for habitat restoration, and to manage the site as a carbon sink through restoration and rehabilitation. This aligns with the National Peatlands Strategy 2015 to 2025 and is notable with respect to carbon accounting. The projected carbon accounts for habitat restoration should be considered against the carbon accounting for the proposed wind farm. It should also be noted that habitat restoration would not only contribute to carbon sequestration but is also important in terms of flood management, water quality and for biodiversity in general.

Ecological Data and Surveys

Along with the standard NPWS data requests which is recommended, other sources of habitat and species information beyond those already identified include (but are not be limited to): the National Biodiversity Data Centre (www.biodiversityireland.ie), Inland Fisheries Ireland (www.fisheriesireland.ie), BirdWatch Ireland (www.birdwatchireland.ie), Irish Raptor Study Group, Golden Eagle Trust and Bat Conservation Ireland (www.batconservationireland.org).

It is expected by this Department that best practice will be adhered to with regard to survey methodology and if necessary non Irish methodology adapted for the Irish situation, noting specific gaps in relation to species and age of the data outlined in some guidance documents. The EIAR should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Inland Fisheries Ireland should be consulted with regard to fish species, if applicable. For information on Geological and Geomorphological sites, the Geological Survey of Ireland, should be consulted.

Where ex-situ impacts are possible, survey work may be required, outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year, depending on the species being surveyed for. The EIAR should include the results of the surveys and detail the survey methodology and timing of such surveys including consistency in terms of timed vantage point surveys.

³ Douse, A (2020) "The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures", NatureScot Information Note. Version 1.1



Ornithology

Surveys for all species should cover bird usage and facilitate assessment of potential collision risk, habitat loss, barrier effect and displacement for these species and should be based around the daily and seasonal activity patterns of the species being surveyed. Survey work should cover year-round site use and should cover a minimum of two years to allow for an accurate determination of site usage. Target species for this site include Annex I (Birds Directive) species and Birds of Conservation Concern (BoCCI) such as Hen Harrier, Merlin, and Red Grouse. Hinterland surveys should include breeding raptor surveys, including roost watches, surveys for nocturnal species and other species-specific surveys as appropriate.

Vantage point surveys should be done in a manner that ensures sufficient data is collected to allow an assessment of the importance of all the flight paths into, out of and between sites and assess migratory movements. Consequently, the Department recommends that a visibility analysis of topography and vegetation is used in the selection of vantage points for ornithological surveys. Technological solutions should also be considered in conjunction with VPs surveys to ensure sufficient data is compiled for assessment.

Results for species need to be referenced back to the overall populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant.

When completing impact assessment for birds, assessment and monitoring results from nearby wind farms must be considered. Cumulative impact on birds from all wind farms in the area needs to be assessed and the data from surrounding sites needs to be considered in the assessment.

Bats

Bat roosts may be present in trees, buildings and bridges. Bat species are protected under the Wildlife Act, 1976 to 2018, and are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). Therefore, damage/disturbance to any such roosts must be avoided in the first instance. While the Minister may grant a derogation licence under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015, a licence can only be granted once a number of strict criteria have been met (see Regulation 54). An assessment of the impact of the proposed wind farm on bat species should be carried out noting recent guidance available, "*Bat and Onshore Wind Turbines: Survey, Assessment and Mitigation, 2019*" published jointly by Scottish Natural Heritage and Bat Conservation Trust and other stakeholders.



Watercourses and wetlands

Wetlands are important areas for biodiversity and ground and surface water quality should be protected during construction and operation of the proposed development. The EIAR should include a detailed assessment of the hydrological impacts on wetlands from the proposed development. Any watercourse or wetland which may be impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. For example, these species could include Otter (*Lutra lutra*) which are protected under the Wildlife Acts and listed on Annex II and IV of the Habitats Directive, Salmon (*Salmo salar*), Lamprey (three species in Ireland), White-clawed Crayfish (*Austropotamobius pallipes*) listed on Annex II of the Habitats Directive, Frogs (*Rana temporaria*) and Newts (*Trituris vulgaris*) protected under the Wildlife Acts and Kingfishers (*Alcedo atthis*) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC).

Hedgerows, Scrub and related habitats

Hedgerows and scrub should be maintained where possible, as they form wildlife corridors and provide areas for birds to nest in; hedgerows provide a habitat for woodland flora, roosting places for bats and Badger setts may also be present. The EIAR should provide an estimate of the length/area of any hedgerow/scrub that will be removed. Where it is proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Hedgerows, trees, scrub and uncultivated vegetation (including peatland habitats) should not be removed during the nesting season (i.e. March 1st to August 31st), noting the protection afforded under the Wildlife Act 1976-2018.

Marsh Fritillary

Marsh fritillary surveys should be carried out as per standard Marsh Fritillary Larval Web Survey methodology.

Alien invasive species

The EIAR should also address the issue of invasive alien plant and animal species such as *Rhododendron ponticum* and Japanese Knotweed, and detail the methods required to ensure they are not accidentally introduced or spread during survey and or construction. Information on alien Invasive species In Ireland can be found at <http://invasives.biodiversityireland.ie/> and at <http://invasivespeciesireland.com/>.

Impact assessment

The impact of the proposed development on the flora/ fauna and habitats present should be assessed with particular regard to:

- Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC)
- Special Protection Areas (SPA) designated under the EC Birds Directive (Council Directive 2009/147 EC);



- proposed Natural Heritage Areas;
- species protected under the Wildlife Acts including protected flora;

'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including

- Birds Directive - Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur);
- Habitats Directive - Annex I habitats, Annex II species and their habitats;
- Annex IV species and their breeding sites and resting places (wherever they occur);
- important bird areas such as those identified by Birdlife International, features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive;
- other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans);
- Red data book species;
- and biodiversity in general.

Construction Management Plans and Mitigation

Complete project details including Construction Management Plans (CMPs) need to be provided in order to allow an adequate EIA and appropriate assessment to be undertaken. CMPS should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. Any mitigation needs to be included in detail and if being relied upon to reach conclusions must be proved to be achievable and likely to be effective in any given scenario it is needed. Proof of effectiveness will be required with examples of where similar techniques have been employed previously.

Applicants need to be able to demonstrate that CMPs and other such plans are adequate, all mitigation is included and effective and supported by scientific information and analysis and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated sites, habitats and species in their own right and could have an effect for example on, drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered.

Construction work should not be allowed to impact on water quality and measures should be detailed in the EIA to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species.



Inland Fisheries Ireland (IFI) should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" (2020) which can be downloaded from their web site.

If applicants are not in a position to state the exact location and details of cable routes at the time of application, then they need to consider the range of options (overhead and underground) that may be used within their assessment.

The Department draws your attention to the recent High Court decision with respect to the High Court judicial review *Sweetman V An Bord Pleanála* (2021)IEHC 390 and the appropriate detail of project description required for an EIA.

Guidance on the Appropriate Assessment (AA):

In order to carry out the Appropriate Assessment screening, and/or prepare a Natura Impact Statement (NIS), information about the relevant European sites including their conservation objectives will need to be collected.

Screening for appropriate assessment should focus on the likely significant effects of the proposed development and related activities on European sites noting that impacts to sites via air and water may occur over large distances using the source-pathway-receptor model. Details of designated sites and species and conservation objectives can be found on <http://www.npws.ie/>.

In addition, the Article 12 and 17 reports under the Birds and Habitats Directives should be referenced <https://www.npws.ie/publications>. The Departmental guidance document on Appropriate Assessment is available on the NPWS website at <https://www.npws.ie/development-consultations> and in EU Commission guidance entitled:

- "*Wind energy developments and Natura 2000*"⁴
- "*Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*"⁵;
- 2018 Commission notice "*Managing Natura 2000 sites The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC*"⁶ (updated June 2020)

⁴ https://ec.europa.eu/environment/nature/natura2000/management/docs/Wind_farms.pdf

⁵ http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_asses_s_en.pdf

⁶ https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/EN_art_6_guide_jun_2019.pdf



More recent CJEU and Irish case law has clarified some issues and should also be consulted.

The NIS should present a robust and reasoned scientific assessment and analysis of the implications of the proposals for the relevant conservation objectives of relevant European sites. Best scientific knowledge in the field should be applied to the understanding of the likely effects, and to the assessment and analysis of the implications of the proposals for the conservation objectives and integrity of the sites. When carried out by the competent authority, the appropriate assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the project on European sites.

Cumulative and ex situ impacts

A rule of thumb often used is to include all European sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 kilometres away.

Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any European sites.

As noted already assessment and monitoring results from nearby wind farms should be considered. Cumulative impact from all wind farms in the area needs to be assessed and the data from surrounding sites needs to be considered in the assessment of impacts.

Post construction monitoring

This Department recognises the importance of pre and post construction monitoring, such as recommended in Drewitt et al. (2006), and Bat Conservation Ireland (2012). The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment. Please refer to Circular Letter PD 2/07 and NPWS 1/07 on this issue. This can be downloaded from the Department's website <https://www.npws.ie/development-consultations> .

The EIAR process should identify any pre and post construction monitoring which should be carried out. The post construction monitoring should include bird and bat strikes/fatalities including the impact on any such results of the removal of carcasses by scavengers. Monitoring results should be made available to the competent authority and copied to this Department. An appropriate plan of action needs to be agreed at planning stage with the Planning Authority if the results in future show a significant mortality of birds and/or bat species. It is important to note that unless post decision consultation with NPWS is specifically stated as a condition of planning, NPWS has no post consent role. However,



regional staff are available for liaison regarding any associated licencing requirements and or new information arising for specific species of concern.

Note: any significant change to mitigation may require amendment and where a licence has expired; there will be a need for new licence applications for protected species.

Licenses

Where there are impacts on protected species and their habitats, resting or breeding places, licenses may be required under the Wildlife Act 1976-2018 or derogations under the EC (Birds and Natural Habitats) Regulations 2011, as amended.

In particular, bats as outlined earlier and otters, are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). A copy of Circular Letter NPWS 2/07 entitled “*Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences*” can be found on the Departmental web site at www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf. It should be noted that the Regulations of 1997 have since been superseded by the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. Part 6 of those Regulations is now the relevant section dealing with the protection of flora and fauna. Reference to Regulation 23 in the circular letter should be taken to mean Regulation 51 in the current Regulations.

In addition, the EIAR should take account of species protected under sections 21, 22 and 23 of the Wildlife Acts if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds’ nests. And will also need to be cognisant of article 5 (d) of the Birds Directive. For that reason uncultivated vegetation, including hedges and trees, should not be removed during the nesting season (i.e. March 1st to August 31st).

In order to apply for any such licenses or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should be provided. Should this survey work take place well before construction commences, it is recommended that an additional ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the findings of the baseline ecological survey has occurred. As outlined already, if there has been any significant change mitigation, this may require amendment and where a licence has expired, there will be a need for new licence applications for the protected species.



The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/ies, in the role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie, or to the address below.

Is mise le meas,

A handwritten signature in black ink, appearing to read 'Diarmuid Buttimer', is written over a circular stamp or seal.

Diarmuid Buttimer
Development Applications Unit
Administration

Fehily Timoney & Company,
Core House,
Pouladuff Road,
Cork City,
T12 D773

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
D01 WA07
Éire

Irish Water
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 01 89 25000
T: +353 01 89 25001
www.water.ie

20th August 2020

Re: EIAR Scoping Request - Proposed wind farm site and grid connection include lands in the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skee-hans, Lagg, County Waterford.

Dear Sir/Madam

Irish Water (IW) acknowledges receipt of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for proposed wind energy development located at Coumnagappul, Co. Waterford.

Please see attached our suggested scope in relation to Water Services. On receipt of the planning referral, Irish Water will review the EIAR as part of the planning process.

Queries relating to the terms and observations above should be directed to planning@water.ie

Yours sincerely,

Signed on behalf of Irish Water:

Maria O'Dwyer
Connections and Development Services

Response to EIAR Scoping Report Requests

IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

- a) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require 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 IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- b) Any up-grading of water services infrastructure that would be required to accommodate the development.
- c) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- d) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- e) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets
- f) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development to datarequests@water.ie. Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- g) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- h) 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 IW for public supply.
- i) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- j) Mitigation measures in relation to any of the above

This is not an exhaustive list.

Please note

- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.
- Irish Water will not accept new surface water discharges to combined sewer networks

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
D01 WA07
Éire

Irish Water
PO Box 6000
Dublin 1
D01 WA07
Ireland

T: +353 01 89 25000
T: +353 01 89 25001
www.water.ie

From: [IWT Info](#)
To: [Coumnagappul Wind Farm](#)
Subject: Re: Stakeholder Consultation for Development Application
Date: Wednesday 4 August 2021 15:15:41
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Dear Marie,

Thank you for contacting the Irish Wildlife Trust.

We acknowledge that we receive the letter, however, we do not have the capacity to consider or respond to all scoping / consultation requests at the moment. We will endeavour to respond if possible.

Regards,
Fabiola Vieira
The Irish Wildlife Trust

On Wed, 4 Aug 2021 at 13:02, Coumnagappul Wind Farm <Coumnagappul@ftco.ie> wrote:

Dear Sir/Madam,

Coumnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Coumnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Coumnagappul@ftco.ie

Kind Regards,

Marie Geary
for Rita Mansfield

for and on behalf of **Fehily Timoney and Company**



Fehily Timoney and Company

Core House, Pouladuff Road, Cork, T12

D773

t: +353 21 496 9560

www.fehilytimoney.ie



This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

--

HELP SUPPORT OUR WORK - Join the IWT Today - <https://iwt.ie/support-us/become-a-member/>

Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2

Registered Charity (CRA) Number: 20010966

Facebook: IrishWildlifeTrust

Twitter: @irishwildlife

Phone: 01 445 7259

From: [Myles Redmond](#)
To: [Coumnagappul Wind Farm](#)
Cc: [Wilson Dalikenj](#)
Subject: RE: Proposed Coumnagappul Wind Farm Environmental Impact Assessment Report - Scoping & Consultation Request
Date: Monday 28 September 2020 09:24:59
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
[ATT00001.txt](#)
[ATT00002.htm](#)

Hi,

I have completed an impact assessment of the proposed Windfarm development and can confirm this development will have no impact to ESB Networks Point to Point and Point to Multipoint Radio network.

Regards,

Myles

From: Marie Geary <marie.geary@ftco.ie>
Sent: Wednesday 12 August 2020 13:50
To: salesenquiries (Customer Solutions) <salesenquiries@esbtelecoms.ie>
Subject: Proposed Coumnagappul Wind Farm Environmental Impact Assessment Report – Scoping & Consultation Request

CAUTION: This email is from an external sender. If you are unsure about any links or attachments, please forward it to ESB Cybersecurity Operations at spammonitor@esb.ie

Dear Sir/Madam,

Please find attached letter and Scoping Report for the above named project.

Yours sincerely,
Marie Geary
for Crystal Leiker



Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 9560
www.fehilytimoney.ie

This message is for the intended recipient only. It may contain confidential or proprietary

information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

Irish Aviation Authority
The Times Building
11-12 D'Olier Street
Dublin 2, D02 T449,
Ireland

Údarás Eitlíochta na hÉireann
Foirgneamh na hAmanna
11-12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449,
Éire

T: +353 1 671 8655
F: +353 1 679 2934
www.iaa.ie



FEHILY TIMONEY & Co

Date 24th August 2020

Distribution **CL**

27 AUG 2020

Ms Crystal Leiker
Fehily Timoney & Company
Core House
Pouladuff Road
Co Cork

Job No:
Correspondence No:
Comment:

Development: The proposed development will comprise up to 11 turbines with a tip height of up to 160m, turbine foundations and hard standing areas, new access tracks and upgrading of existing access tracks, 1 no. substation including control buildings, underground electrical and communications cabling, drainage and sediment controls, temporary site compound and associated works. The proposed development will have a Maximum Export Capacity (MEC) of up to 50MW. Further details on the proposed development include the turbine delivery route and grid connection route are provided in section 2 of this report. A preliminary site layout is presented in Figure 1-2. at townlands of Coumragappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, County Waterford. The proposed grid connection crosses the townlands of Kilkeany, Croughnagree, Castlereagh, Reanadampaun, Toorneena Knockboy, Lackandarra Upper, Knockanpower Upper, Curraghnamaddree, Knocknamaulee, Garycone, Garycline, Colligan More, Colliganwood, Ballyconnery Lower, Ballymacmagne South, Kildangan.

Dear Sir/Madam,

Thank you for your email and the attached Environmental Impact Assessment Report – Scoping & Consultation Request for the proposed Coumragappul Wind Farm in County Waterford.

It is the observation of the Safety Regulation Division – Aerodromes, that even at this pre-planning stage, it would be prudent if the developers would engage as early as possible with IAA's Air Navigation Service Provider (ANSP), Cork Airport and Waterford Airport to undertake a preliminary screening assessment to confirm that the proposed wind farm and the associated cranes that would be utilised during its construction would have no impact on instrument flight procedures, communication and navigation aids or flight checking at either Cork Airport or Waterford Airport.

Relevant contact details, are as follows:

IAA-ANSP:	IAA-ANSP:	IAA Engineering	Aerodrome Operator:	Aerodrome Operator:
Mr. Cathal Mac Criostail Údarás Eitlíochta na hÉireann / Irish Aviation Authority The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449, Ireland cathal.maccristail@iaa.ie +353 (0)1 6031173 +353 (0)86 0527130	Mr. Jonathan Byrne Operations Manager STBU/CTBU Air Traffic Control Irish Aviation Authority jonathan.byrne@iaa.ie +353 61 703704 +353 87 9375486	Mr. Charlie O'Loughlin Manager Surveillance M&E Systems, Irish Aviation Authority, Shannon Area Control Centre, Ballycasey Cross, Shannon, Co. Clare, Ireland. Email: Charlie.oloughlin@iaa.ie	Ms. Louise Byrne amd, daa, Cloghran House, Dublin Airport +353 1 9442791 E-mail: planning@daa.ie	Mr. Aidan Power Waterford Airport Ballycar House, Newtown Co. Waterford Email: aidan.power@waterfordairport.ie

Bord Stiúirthóirí/Board of Directors

Michael McGrail (Cathaoirleach/Chairperson),
Peter Kearney (Príomhfhéidhmeannach/Chief Executive)
Cian Blackwell, Marie Bradley, Ernie Donnelly,
Gerry Lumsden, Joan McGrath, Eimer O'Rourke

Offig Chláraithe:

Foirgneamh na hAmanna, 11-12 Sráid D'Olier
Baile Átha Cliath 2, D02 T449, Éire
Uimhir Chláraithe: 211082. Áit Chláraithe: Éire
Cuideachta Díleatanais Theoranta

Registered Office:

The Times Building, 11-12 D'Olier Street
Dublin 2, D02 T449, Ireland
Registered No. 211082. Registered in Ireland
A Limited Liability Company



QUALITY
ISO 9001:2015
NSAI Certified



During the formal planning process, the Safety Regulation Division – Aerodromes will likely make the following general observation:

In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:

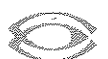
- (1) agree an aeronautical obstacle warning light scheme for the wind farm development,
- (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location

<i>Turbine No.</i>	<i>WGS-84 Co-ordinates</i>	<i>Ground elevation (Malin Head OD)</i>	<i>Blade tip elevation of turbine (Malin Head OD)</i>	<i>Height of turbine (height from ground level to blade tip)</i>	<i>Confirm if turbine has obstacle lighting.</i>
T1	53.346125, -6.258288	75m	225m	150m	No

(3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.'

Yours sincerely

Deirdre Forrest
Corporate Affairs



From: [Roger Woods](#)
To: [Counnagappul Wind Farm](#)
Subject: RE: Stakeholder Consultation for Development Application
Date: Monday 9 August 2021 09:37:20
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Hi Jennifer

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.

Regards

Roger

Senior Executive Engineer
Broadcasting Authority of Ireland
2-5 Warrington Place
Dublin D02 XP29

Tel: 01 6441200

Fax: 01 6441299

This email and any files transmitted with it are confidential and intended solely for the use of the addressee. If you have received this email in error, please notify the sender or info@bai.ie immediately and delete this email. If you are not the intended recipient, any distribution or copying of this e-mail is strictly prohibited.

Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda agus is leis an duine sin amháin a bhfuil siad seolta chuige/chuici a bhaineann siad. Muna duitse an ríomhphost seo, ní ceart é a léamh ná a scaoileadh chuig aon trú páirtí. Iarrtar ort teachtaireacht a sheoladh chuig an seoltóir nó chuig info@bai.ie, agus an ríomhphost seo a scrios.

From: Counnagappul Wind Farm <Counnagappul@ftco.ie>
Sent: Wednesday 4 August 2021 11:46
To: Reception BAI <reception@bai.ie>
Subject: Stakeholder Consultation for Development Application

Dear Sir/Madam,

Counnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Counnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Counnagappul@ftco.ie

Kind Regards,

Jennifer O'Hanlon
for Rita Mansfield
for and on behalf of Fehily Timoney and Company



Jennifer O'Hanlon
Administrator

Fehily Timoney and Company

Core House, Pouladuff Road, Cork, T12 D773

t: +353 21 496 9573

www.fehilytimoney.ie



This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

From: [Thomas Barry](#)
To: [Counmagappul Wind Farm](#)
Subject: RE: EXTERNAL MAIL:- RE: Stakeholder Consultation for Development Application Counmagappul Wind Farm
Date: Friday 7 January 2022 11:34:46
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.png](#)
[image007.png](#)

Rita,

We anticipate no impact from the development in the area proposed, can you ensure the proposal is also reviewed by eir.

Regards,
Tom

From: Counmagappul Wind Farm [mailto:Counmagappul@ftco.ie]
Sent: Monday 13 December 2021 11:26
To: Thomas Barry
Cc: Counmagappul Wind Farm
Subject: EXTERNAL MAIL:- RE: Stakeholder Consultation for Development Application Counmagappul Wind Farm

**CAUTION: This mail is from outside Tetra.
Do NOT click suspicious links.
Do NOT click or download suspicious attachments.**

Tom,

Apologies for the delay in reverting, your mail slipped past me.

The turbine co-ordinates are as follows:

T1	-7.651001,52.242010
T2	-7.641913,52.243343
T3	-7.663254,52.234780
T4	-7.653596,52.235109
T5	-7.643628,52.237798
T6	-7.633974,52.237546
T7	-7.636850,52.232027
T8	-7.642117,52.227051
T9	-7.630707,52.228665
T10	-7.638813,52.222717
T11	-7.630474,52.221845

Looking forward to hearing back from you.

Kind regards,

Rita Mansfield



Rita Mansfield
Project Manager

Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 4133
www.fehilytimoney.ie

From: Thomas Barry <Tom.Barry@TETRAIRELAND.IE>
Sent: Friday 6 August 2021 07:38
To: Coumnagappul Wind Farm <Coumnagappul@ftco.ie>
Subject: FW: Stakeholder Consultation for Development Application Coumnagappul Wind Farm

Jennifer/Rita,

Do you have the co-ordinates of the proposed turbine locations please.

Regards,
Tom

From: Derek Rosarius
Sent: Wednesday 4 August 2021 15:20
To: Thomas Barry
Subject: FW: Stakeholder Consultation for Development Application

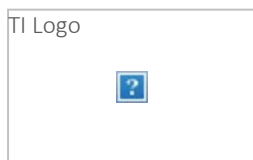
Sent to info

Regards

Derek Rosarius | Compliance Manager |

TETRA Ireland Communications Ltd

Block 43a, 2nd floor, Yeats Way, Parkwest Business Park, Nangor Road, D12
M +353 85 1746044 | E derek.rosarius@tetraireland.ie | www.tetraireland.ie/



From: Coumnagappul Wind Farm [<mailto:Coumnagappul@ftco.ie>]
Sent: Wednesday 4 August 2021 11:52
To: Info
Subject: Stakeholder Consultation for Development Application

Dear Sir/Madam,

Coumnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Coumnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Coumnagappul@ftco.ie

Kind Regards,

Jennifer O'Hanlon
for Rita Mansfield
for and on behalf of Fehily Timoney and Company



Jennifer O'Hanlon
Administrator

Fehily Timoney and Company
Core House, Pouladuff Road, Cork, T12 D773
t: +353 21 496 9573
www.fehilytimoney.ie

This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure.

Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure.

Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

From: [INFO](#)
To: [Cumnagappul Wind Farm](#)
Subject: RE: Stakeholder Consultation for Development Application
Date: Wednesday 11 August 2021 14:10:42
Attachments: [image004.png](#)
[image007.png](#)
[image008.png](#)
[image001.jpg](#)

Dear Ms. Geary,

I refer to your email of 4 August 2021 regarding the above EIAR Scoping exercise.

TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

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

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

- It appears that the proposed windfarm site accesses the local and regional road network prior to access to the national road network. Access to the road network shall be developed in accordance with official policy and road safety considerations, as outlined above. Consultations should be had 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.
- The developer should assess 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, 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., National Roads Authority, 2004)).
 - It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (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 the NRA/TII 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.
- <!--[if !supportLists]-->• <!--[endif]-->TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all 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 national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

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 such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal 'length' loads (eg. tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

Designers should consult TII Publications to determine whether a Road Safety Audit is required for any of the temporary works proposed. Any recommendations should be incorporated into designs.

- It is noted that options for the grid connection to the existing 110kV substation at Dungarvan via underground cable include proposals along the N72.

TII advise that 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.

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

There is around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy. Therefore, TII advises that 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.

Other consents or licences may be required from the road authority for any trenching or

cabling proposals crossing the national road. The Authority requests referral of all proposals agreed and licensed between the road authority and the applicant which affect the national road network.

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

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

I trust that the above comments are of use in your EIAR preparation.

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
Ref No. TII21-114231



From: Coumnagappul Wind Farm <Coumnagappul@ftco.ie>
Sent: Wednesday 4 August 2021 13:09
To: INFO <Information@tii.ie>
Subject: Stakeholder Consultation for Development Application

CAUTION: This email originated from outside of TII. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Madam,

Coumnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Coumnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Coumnagappul@ftco.ie

Kind Regards,

Marie Geary
for Rita Mansfield
for and on behalf of **Fehily Timoney and Company**



Fehily Timoney and Company

Core House, Pouladuff Road, Cork, T12 D773

t: +353 21 496 9560

www.fehilytimoney.ie



This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

TII processes personal data provided to it in accordance with its Data Protection Notice available at <http://www.tii.ie/about/> Próiseálann

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <http://www.tii.ie/about/>

TII E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error then please notify postmaster@tii.ie and delete the original including attachments.

Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do postmaster@tii.ie, le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.

From: [Mark Nolan](#)
To: [Counnagappul Wind Farm](#)
Subject: RE: Stakeholder Consultation for Development Application
Date: Monday 9 August 2021 14:44:09
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)

Hi Jennifer,

This will have no impact on VM B2B services in the area.

Rgds

Mark

Mark Nolan | B2B Access Networks Manager
Virgin Media | Limerick, Roxboro Rd, Limerick
D: + 353 1 245 8480 | M: + 353 862315007
Mark.Nolan@virginmedia.ie | www.virginmedia.ie

From: Counnagappul Wind Farm <Counnagappul@ftco.ie>
Sent: Wednesday 4 August 2021 11:54
To: Mark Nolan <Mark.Nolan@virginmedia.ie>
Subject: Stakeholder Consultation for Development Application

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Sir/Madam,

Counnagappul Wind Farm Ltd. intends to apply for planning permission for a renewable energy development.

Counnagappul Wind Farm Ltd. has appointed Fehily Timoney and Company to prepare an Environmental Impact Assessment Report (EIAR) for the proposed development. Please see attached letter describing the proposed development and requesting commentary you may have on the proposed development, relevant to your area of expertise. A response to this letter is required by Wednesday 25th August 2021.

If you have no comments to make, we would be grateful if you would please acknowledge receipt of this letter. Comments or acknowledgements can be sent via email to Counnagappul@ftco.ie

Kind Regards,

Jennifer O'Hanlon
for Rita Mansfield
for and on behalf of Fehily Timoney and Company



Jennifer O'Hanlon
Administrator

Fehily Timoney and Company

Core House, Pouladuff Road, Cork, T12 D773

t: +353 21 496 9573

www.fehilytimoney.ie



This message is for the intended recipient only. It may contain confidential or proprietary information. If you receive this message in error, please immediately delete it, destroy all copies of it and notify the sender. You must not use or disclose any part of this message if you are not the intended recipient. We may monitor all email communication through our networks. Any views expressed in this message are those of the individual sender, except where the message states otherwise. We take reasonable precautions to ensure our emails are virus free. However, we cannot accept responsibility for any virus transmitted by us and recommend that you subject any incoming email to your own virus checking procedure. Fehily Timoney is registered in Ireland as a private company limited by shares. Registration No. 180497. Registered office: Core House, Pouladuff Road, Cork, Ireland

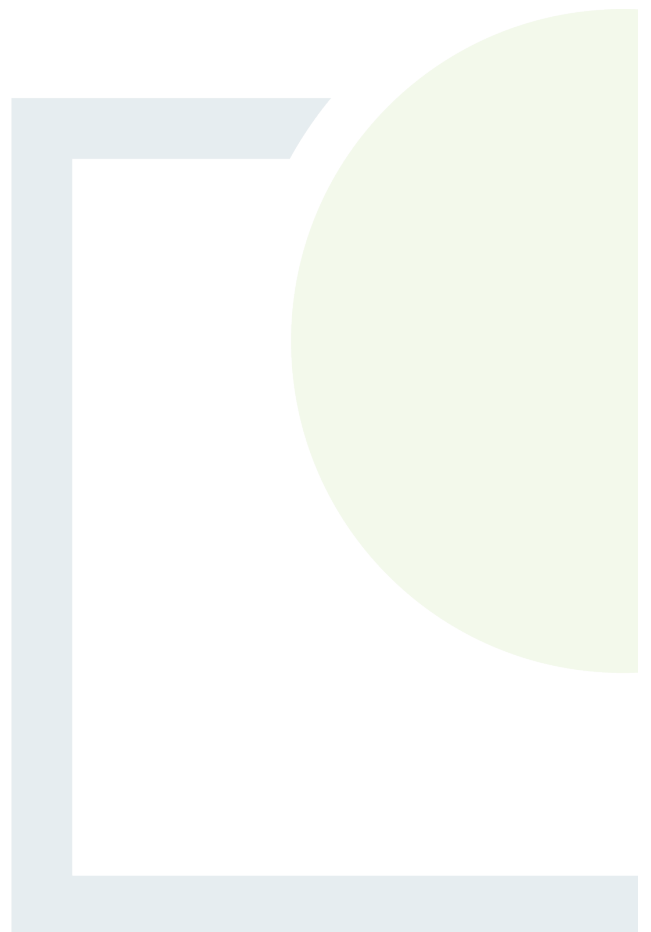
***** Virgin Media Ireland Limited Registered Number in Ireland: 435668
Registered Address: Macken House, 39/40 Mayor Street Upper, Dublin 1, D01 C9W8. The contents of this email and any attachments are sent for the attention of the addressee(s) only and are or may be confidential, proprietary and/or privileged material. If you have received this email in error, please notify the sender immediately and delete it from your system. If you are not the addressee, any review, retransmission, disclosure, copying or other use of this email and any attachments is prohibited. Statements and opinions expressed in this email may not represent those of the company and any representations or commitments in this email are subject to contract."*****



CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE
& PLANNING

APPENDIX 5.1

Pre-Planning
Consultation Minutes



MEETING MINUTES: COUMNAGAPPUL WIND FARM – MEETING WITH WATERFORD CITY AND COUNTY COUNCIL

Location: Zoom Meeting

Date: 08/09/21 10:00am

Attendees	Initials
Marc McLoughlin (EMP)	MM
Michael O' Connor (EMP)	MOC
Robert Greene (EMP)	RG
Aisling O' Sullivan (WCCC)	AOS
Hazel O' Shea (WCCC)	HOS
Rita Mansfield (FT)	RM
Apologies	
Jim Hughes (FT)	JH

No.	Note	Action Note or Initials of Owner/All
1.0	Introductions	
1.1	Introductions were made by all attendees, their role on the project outlined, and an overview of the project provided to WCCC in PowerPoint presentation format.	Note
1.2	Key Points: <ul style="list-style-type: none"> 11 turbine wind farm with individual power outputs up to approximately 6.2 MW. 185 tip height SID Pre-Application with the Bord 22nd April 2021. Preliminary view that it is SID. Has not been closed out. EIAR and NIS will be produced. 	Note
2.0	Consultation	
2.1	HOS asked that local bird groups are contacted as part of public consultation.	FT/EMP
2.2	WCCC queried the general feedback received from the community to date regarding the proposals. MM clarified that the primary concern related to noise, however the site is in a remote location and noise assessments to date indicate no significant effects.	Note
2.3	WCCC asked that the public be made aware that the design and assessment for the project is aligning to the Draft Guidelines.	EMP
2.4	WCCC queried why 2km buffer has been used for postal leaflet drop and asked that EMP provide transparency as to the decision making process behind this range.	EMP
3.0	Scoping	
3.1	WCCC noted that they have received the scoping report and have committed to returning comments within 2 weeks and apologised for delay in response.	WCCC
3.2	WCCC noted water quality and hydrology as key environmental receptors	Note

3.3	WCCC asked that FT/EMP contact Nial Keane (Senior Exec. Engineer, Environment) in relation to local authority requirements for the project. HOS to forward contact details.	HOS
4.0	Next Meeting	
4.1	To be arranged following feedback from WCCC on scoping report.	FT
5.0	AOB	
5.1	RM asked that John Leonard (WCCC) attend the next meeting to discuss the turbine delivery route and site access.	WCCC
5.2	RM advised that a retention application for the meteorological mast currently erected on site will be submitted in the coming days. WCCC noted that this application should provide justification for the need for the mast and for the associated duration of same.	FT/EMP

End

MEETING MINUTES: COUMNAGAPPUL WIND FARM – MEETING WITH WATERFORD CITY AND COUNTY COUNCIL

Location: Microsoft Teams Meeting

Date: 28/04/2022 11:30am

Attendees	Initials
Marc McLoughlin (EMP)	MM
Aisling O' Sullivan (WCCC)	AOS
Aidan Walsh (WCCC)	AW
Bernadette Guest (WCCC)	BG
Niall Kane (WCCC)	NK
Rita Mansfield (FT)	RM
Apologies	
Michael O' Connor (EMP)	MOC
Robert Greene (EMP)	RG
Hazel O' Shea (WCCC)	HOS
Noel Flynn (WCCC)	NF

No.	Note	Action Note or Initials of Owner/All
1.0	Introductions	
1.1	Introductions were made by all attendees, their role on the project outlined, and an overview of the project provided to WCCC in PowerPoint presentation format.	Note
1.2	Key Points: <ul style="list-style-type: none"> Original layout was for an 11 turbine wind farm with individual power outputs up to approximately 6.2 MW. 185 tip height. New revised layout is for a 10 turbine wind farm with power ratings which may range from 6.5 MW to 7.2 MW. Candidate Turbine is Vestas V162. Revised layout is strongly informed by LVIA assessment and has been subjected to an extended Wind Measurement Campaign. SID Pre-Application with the Bord 22nd April 2021. Preliminary view that it is SID. Has not been closed out. Next meeting with the Board scheduled for 25/05/2022 EIAR and NIS will be produced. 	Note
2.0	Consultation	
2.1	MM noted that next public consultation is likely to be face to face, and it will be scheduled shortly.	Note
2.2	AOS & BG asked that the next round of newsletters for the project are dropped in an extended radius beyond the current 2 km. A 3-3.5 km radius	EMP

	was suggested. MM noted that EMP will also target nearby population centres for the next leaflet drop.	
2.3	WCCC asked that local hillwalking groups are included in the public consultation e.g. Dungarvan Hillwalking Club and Comeragh Mountaineering Club, and that Orienteering Ireland and mountaineering Ireland are also contacted. .	EMP
3.0	Scoping	
3.1	RM noted that EIA Scoping Report for the project was issued to WCCC in August 2021 and asked that a scoping response is provided. RM asked if this could be provided in advance of the upcoming scheduled meeting with the Board.	WCCC
3.2	AW raised concern about the height of the turbines. He asked that the EIAR provides a robust assessment of alternatives in relation to LVIA and turbine height and that this assessment should demonstrate the differences between using a smaller turbine Vs the V162 @ 185m tip height.	FT/EMP
3.3	WCCC noted that the draft Wind Energy Strategy is currently under review.	Note
3.4	WCCC asked that the EIAR noise assessment have regard to the 2019 Draft Wind Energy Guidelines.	Note
4.0	Turbine delivery route and site access	
4.1	NK noted that the local roads are not suitable for construction traffic. RM noted that a Traffic Management Plan will be prepared for the Project which will address turbine delivery and construction traffic. Requirements for passing bays will be identified and reinstatement requirements outlined.	FT
5.0	Cable Infrastructure	
5.1	WCCC's preference is that cable infrastructure is kept away from regional roads. NK asked that given that WCCC are not in favour of allowing grid connection under their road network, every other alternative option must be demonstrated to have been assessed if EMP are proposing to put the cable in the road.	EMP/ FT
5.2	MM noted that TLI has been appointed to assess network connection and cable alignment options. He noted that the only feasible option for network connection is to the existing Dungarvan Substation. NK noted that a local solar development has proposed to connect to Dungarvan also and the TII has indicated dissatisfaction with this proposal as it is at odds with policy for Safeguarding the Strategic National Road Network. NK recommended that TLI engage with TII.	EMP
6.0	AOB	
6.1	MM noted that the Community Benefit scheme will be employed through RESS.	Note

End

Post Meeting Note: Scoping response was received from WCCC 18/05/2022 by email. Attached for information.

Rita Mansfield

From: Aisling O'Sullivan <aosullivan@waterfordcouncil.ie>
Sent: Wednesday 18 May 2022 10:21
To: Rita Mansfield
Cc: Lee-Ann McGrath
Subject: RE: Coumnagappul Wind Farm SID EIAR Scoping Comments from WCCC

Dear Rita ,

Please find below Coumnagappul Wind Farm SID EIAR Scoping Comments from WCCC

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.

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

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 EIAR shall detail direct, indirect and in combination effects of the development in an area recognised for its high landscape and scenic amenity.

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.
- **Haul routes-** The EIAR 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.

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 .

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 EIAR shall detail direct, indirect and in combination effects of the development in an area recognised for its high landscape and scenic amenity.

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 EIAR

needs to demonstrate how the proposed development will impact on the objectives for protection of Blue Dot Catchments under the Water Framework Directive.

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.

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.

The above comments should be taken into consideration

Regards

Aisling O'Sullivan | Senior Executive Planner
Waterford City & County Council, Civic Offices, Dungarvan, Co Waterford

From: Rita Mansfield <rita.mansfield@ftco.ie>
Sent: Tuesday 17 May 2022 14:45
To: Aisling O'Sullivan <aosullivan@waterfordcouncil.ie>
Cc: aidanwalsh@waterfordcoco.ie; Noel Flynn <noelflynn@waterfordcouncil.ie>; Niall Kane <nkane@waterfordcouncil.ie>; Bernadette Guest <bguest@waterfordcouncil.ie>
Subject: RE: Coumnagappul Wind Farm

Good Afternoon Aisling,

I hope you are keeping well.

Following up on the email thread below, I wonder if it will be possible to have some high level / key observations from WCCC on the Scoping Report in advance of the scheduled meeting with the Board on 20th May?

Kind regards,

Rita Mansfield

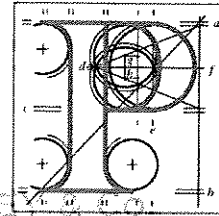
From: Rita Mansfield
Sent: Thursday 28 April 2022 13:17
To: Michael O'Connor <moc@emp.group>; Marc McLoughlin <mml@emp.group>; aosullivan@waterfordcouncil.ie; aidanwalsh@waterfordcoco.ie; noelflynn@waterfordcouncil.ie; nkane@waterfordcouncil.ie; bguest@waterfordcouncil.ie
Cc: Jim Hughes <jim.hughes@ftco.ie>; Trevor Byrne <trevor.byrne@ftco.ie>; Aidan Walsh <aidanwalsh@waterfordcouncil.ie>
Subject: RE: Coumnagappul Wind Farm

Thank you all for your time today.

As promised please find attached a copy of the presentation from our meeting. We would be much appreciative of any comments you may have following or meeting and/or in response to scoping in advance of our meeting scheduled with the Board for 20th May 2022.

Our Case Number: ABP-309259-21

Your Reference: Coumnaappul Wind Farm Limited



**An
Bord
Pleanála**

FEHILY TIMONEY

Signature: *JM (RM)*

15 MAY 2021

in reply to: 1
correspondence No:
reference:

Fehily Timoney
Core House
Pouladuff Road
Cork
Co. Cork

Date: 4th May 2021

Re: Proposed Coumnaappul Wind Farm consisting of up to 11 turbines.
In the townlands of Coumnaappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, Co. Waterford.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the 1st meeting of the 22nd April, 2021.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP Kerley MCGilligan

Sarah Kerley
Executive Officer
Direct Line: 01-873 7287

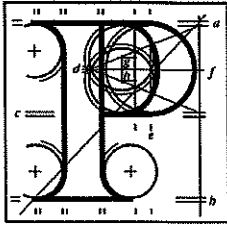
VC07

Tel (01) 858 8100
Glao Áitiúil 1890 275 175
Facs (01) 872 2684
Láithreán Gréasáin www.pleanala.ie
Ríomhphost bord@pleanala.ie

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoibhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



An
Bord
Pleanála

Record of Meeting ABP-309259-21 1st meeting

Description	ABP-309259-21 - Proposed Coumnagappul Wind Farm consisting of up to 11 turbines, Co. Waterford		
Case Type	Pre-application Consultation under Section 37B of the P&D Act 2006, as amended.		
1st / 2nd / 3rd Meeting	1 st Meeting		
Venue	Virtually by Microsoft Teams		
Date	22/04/2021	Time	11am – 12:15pm

Representing An Bord Pleanála

Ciara Kellett, Assistant Director of Planning (Chair)

Patricia Calleary, Senior Planning Inspector

Sarah Kerley, Executive Officer s.kerley@pleanala.ie 01-8737287

Representing the Prospective Applicant

Alexander Kelly - Coumnagappul Wind Farm Limited

Robert Greene - Coumnagappul Wind Farm Limited

Michael O'Connor - Coumnagappul Wind Farm Limited

Marc McLoughlin - Coumnagappul Wind Farm Limited

Jim Hughes, Director - Fehily Timoney

Rita Mansfield - Fehily Timoney

Introduction:

The Board referred to the letter received from the prospective applicant on the 22nd January 2021, requesting pre-application consultations and advised the prospective applicant that the instant meeting essentially constituted an information-gathering exercise for the Board. It also invited the prospective applicant to outline the nature of the proposed development and to highlight any matters that it wished to receive advice on from the Board. The Board mentioned the following general procedures in relation to the pre-application consultation process:

- The Board will keep a record of this meeting and any other meetings, if held. Such records will form part of the file which will be made available publicly at the conclusion of the process. The record of the meeting will not be amended by the Board once finalised, but the prospective applicant may submit comments on the record which will form part of the case file.
- The Board will serve notice at the conclusion of the process as to the strategic infrastructure status of the proposed development. It may form a preliminary view at an early stage in the process on the matter.
- A further meeting or meetings may be held in respect of the proposed development.
- Further information may be requested by the Board and public consultations may also be directed by the Board.
- The Board may hold consultations in respect of the proposed development with other bodies.
- The holding of consultations does not prejudice the Board in any way and cannot be relied upon in the formal planning process or in any legal proceedings.

Presentation by the prospective applicant:

The proposed development includes the development of an eleven-turbine wind farm in Co. Waterford, approximately 13.6km north of Dungarvan and c. 13km south of Clonmel, Co. Tipperary, which is being developed by Coumnagappul Wind Farm Limited. The prospective applicant provided an overview of the proposed development under the following headings:

Prospective Applicant Background - Coumnagappul Wind Farm Limited is 100% owned by EMP Energy Limited (EMPower). EMPower is an international renewable energy developer who are developing projects across markets in Africa and Europe.

Proposed Development

- 11 turbines (6MW output each with a maximum tip height of 185 m and a maximum rotor diameter of 155 meters).
- On-site substation.
- Grid connection: 110 kV new on-site substation connected into the Dungarvan 110 kV substation via 110 kV underground cable.

Site Location

- Located approximately 13.6km north of Dungarvan and c. 13km south of Clonmel, Co. Tipperary.
- Low population density.
- High wind speeds.
- Land is designated a 'preferred location' for wind development in Waterford County Development Plan.
- Closest wind farm situated approximately 19km south west.

Turbine Delivery Route - The proposed route for the delivery of turbines to the site is currently undergoing technical assessment. It is potentially commencing at Waterford Port, running along the N25 through Kilcormac onto the N72 to the North of Dungarvan town, then progressing North onto the R672, before turning onto the local road, L5113.

The prospective applicant is aware there may be some pinch points in relation to the local road and these are currently being taken into consideration in its assessment.

Design Iteration - The prospective applicant is currently reviewing two access points to the site, A (South) and B (North) The prospective applicant is identifying the most suitable location for the turbines based on any sensitivities on the site, particularly seeking to minimise clutter when viewed from local receptors and also for wind optimisation. The substation and temporary compound are proposed to be located in the centre of the site. Due to low population density, it is possible to provide four-times tip height distance from receptors (740m).

Legislation & Policy - The prospective applicant states that the proposed development consists of 11 turbines with a total power output of approximately 66mW which exceeds the 50mW threshold set out in the Seventh Schedule of the 2006 Act. The prospective applicant is of the view that the development would be of strategic, economic and social importance to the State or the region in which it would be situate, as the development has the potential of powering up to 36,000 homes and displace the emission of over 50,000 tonnes of carbon dioxide (CO₂) per annum. It would also fulfil the objectives of the National Planning Framework, regional spatial and economic strategy for the Southern Region and also the Climate Action Plan. The proposed development is located in a "preferred area" under the Waterford County Development Plan Renewable Energy Strategy.

Receiving Environment - Most views of the site are to the South and to a lesser extent, to the East. The Comeragh Mountains assist in protecting the extent of visibility to the North. With regards to European sites, most proximate sites include the Comeragh Mountains SAC and the Nier Valley Woodlands SAC. No development is proposed within the SAC, however it does form part of the boundary of the proposed development. Several ecological surveys have been carried out on site since 2019 with preliminary findings showing no signs of significant bird populations in the area

The following details were also highlighted:

- No invasive plant species.
- No bat activity in August 2020.

- No actual or potential bat roosts.
- Bird Surveys ongoing.
- Mammal survey ongoing.

Consultation

The prospective applicant stated that it places a strong emphasis on public engagement and interaction. Public engagement has been ongoing since October 2019, though it slowed down during 2020, due to Covid-19 restrictions. An online webinar was held in December 2020 and copies of the EIA scoping report were distributed to households within 2km of the proposed development. It is expected to hold a follow up webinar in May 2021, and subject to restrictions, a face to face event in July/August 2021. The prospective applicant stressed the importance of having multiple communication tools, including a public consultation website, email, telephone, letter and a Community Liaison Officer appointed in order to obtain effective feedback from the entire community. Meetings have also taken place with Eirgrid, Waterford City & County Council, Irish Water, ESB, GNI, Eircom, Planners, Heritage Officer and Archaeologist.

Discussion


The following matters were discussed:

- The Board's representatives enquired about potential pinch points along the turbine delivery route. The prospective applicant explained they have engaged with a specialist haulage company who are currently reviewing the best route to site and aims to mitigate any potential pinch points.
- The Board's representatives highlighted the importance of considering additional European sites which fall outside the 15km buffer which have the potential to be impacted by the proposed development. The prospective applicant agreed and stated that is their view at this point that appropriate assessment will be required and an Natura Impact Statement will be submitted with the planning application.

- The prospective applicant highlighted the interest in the community fund and their ongoing commitment to addressing local issues.
- The Board's representatives queried the number of affected landowners. The prospective applicant stated there are four main landowners, however, this may increase to seven, to include lands needed to secure turbine delivery and access to the site.
- The Board's representatives asked whether it is expected to include the grid connection as part of the proposed development. The prospective applicant said the grid connection will form part of the Environmental Impact Assessment Report however, it might not form part of the application as this is a matter yet to be decided.
- The Board's representatives queried whether the number of turbines in the proposed development is fixed at 11. The prospective applicant said there may be some minor amendments as they proceed through additional survey work and assessments however, the number of turbines is expected to remain at 11.
- The prospective applicant queried the timeline for a SID determination following receipt of the closure request. The Board's representatives advised to allow 6-8 weeks in their schedule for a SID determination from the Board.
- The Board's representatives offered its preliminary view that the development would seem to fall within the Seventh Schedule and would be Strategic Infrastructure having regard to Section 37(2). However, it emphasised that the ultimate decision on this will be a matter for the Board, in due course.

Conclusion

The record of the meeting will issue to the prospective applicant and it will then be a matter for the prospective applicant to submit any comments on this if it wishes to do so. It will be a matter for the prospective applicant to revert to the Board when it requires a further meeting or to seek to close the pre-application consultation process.

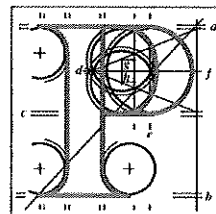
 30/4/21

Ciara Kellett

Assistant Director of Planning

Our Case Number: ABP-309259-21

Your Reference: Coumnagappul Wind Farm Limited



**An
Bord
Pleanála**

Fehily Timoney
Core House
Pouladuff Road
Cork
Co. Cork

FEHILY TIMONEY & CO.

Distribution

23 JUN 2022

Job No: 22360

Correspondence No: 2

Comment:

Date: 2nd June 2022

Re: Proposed Coumnagappul Wind Farm consisting of up to 11 turbines.
In the townlands of Coumnagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, Co. Waterford.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the second meeting of the 25th May, 2022.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

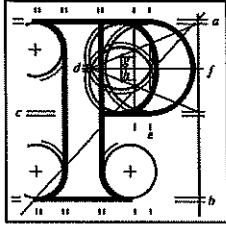
Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-873 7287

PC07

Teil (01) 858 8100
Glaio Áitiúil LoCall 1890 275 175
Facs Fax (01) 872 2684
Láithreán Gréasáin Website www.pleanala.ie
Ríomhphost Email bord@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902



An
Bord
Pleanála

Record of Meeting
ABP-309259-21 2nd
meeting

Description	ABP-309259-21- Proposed Coumnagappul Wind Farm consisting of up to 11 turbines, Co. Waterford		
Case Type	Pre-application Consultation under Section 37B of the P&D Act 2000, as amended.		
1st / 2nd / 3rd Meeting	2 nd Meeting		
Venue	Virtually by Microsoft Teams		
Date	25/05/2022	Time	11:00am – 11:56am

Representing An Bord Pleanála

Ciara Kellett, Assistant Director of Planning (Chair)

Sarah Lynch, Senior Planning Inspector

Máire Daly, Planning Inspector

Sarah Caulfield, Executive Officer | s.caulfield@pleanala.ie | 01-8737287

Representing the Prospective Applicant

Michael O'Connor - Coumnagappul Wind Farm Limited

Rita Mansfield - Fehily Timoney

Anthony Ryan – Fehily Timoney

Introduction

The Board referred to its previous meeting with the prospective applicant of the 22nd April, 2021 and the record of this meeting. The Board asked if the prospective applicant had any comments it wished to make on the record of this meeting; the prospective applicant wished to clarify that an information leaflet was circulated in the local community rather than a scoping document.

Presentation by the prospective applicant:

The prospective applicant provided a brief recap on the first meeting and gave an overview of the proposed development. Following additional surveys, the prospective applicant said there has been some changes made to the design and location of turbines across the site. The current proposal now consists of 10 turbines (a decrease of 1 turbine), with a maximum tip height of 184 metres. It was submitted that the Vesta V162 is the expected turbine model which has a flexible power rating of 6.5MW, 6.8MW and 7.2MW. The final turbine rating has not yet been confirmed.

The prospective applicant provided several maps which detailed the initial turbine layout and the current proposal.

In relation to turbine delivery routes, the prospective applicant said a route assessment analysis and a swept path analysis has been completed which highlighted a number of pinchpoints along the route where works will be required. The delivery route is expected to run from Waterford Port, along the N25, turning right onto the N72 and onto local and regional roads before accessing the site from the west.

In relation to the grid connection, the prospective applicant said the proposed 110kV onsite substation would connect into the Dungarvan 110kV substation via an underground cable. It was submitted that 3 options were considered, and a preferred route was selected which would only require 1 HDD bridge crossing.

The prospective applicant said several studies have been completed including landscape and visual impact assessment, ecology, ornithology & bats, cultural heritage, shadow flicker, baseline noise and modelling and water & hydrology.

Following detailed surveys and analysis, the prospective applicant decided to remove turbine number 9 from the development. Turbine number 3 was also relocated and labelled as turbine number 12.

The prospective applicant said there are 2 residential properties within 1 kilometre of the turbine locations, 38 properties within 2 kilometres and no properties within the recommended 4-times tip height distance (740 metres).

It was submitted, given the low population density in the area, that there will not be an impact due to noise. There are 4 noise monitoring locations and noise modelling is currently ongoing based on the new layout and turbine model.

The prospective applicant said the proposed site has been assessed as low to moderate suitability for bats. Static bat monitoring has been completed.

In relation to Ornithology, the prospective applicant said there is suspected kestrel nesting in the area but anticipates the risk level to be low. However, given this sensitivity, the prospective applicant decided to relocate one turbine to the north, in order to limit the amount of felling required and to protect this habitat.

It was submitted that there is a high level of burning in upland areas which has caused significant damage on the landscape and scarring of habitats. As a result, the prospective applicant said there is low level mammal activity on the site. Additionally, the prospective applicant said there is no invasive species within the site or on the access road leading to the site.

In relation to Archaeology, the prospective applicant said there is no national monuments recorded within the footprint of the turbine array. It was noted that the turbine delivery route and cable route will be assessed from an archaeological perspective also.

The prospective applicant said two consultation meetings have taken place with Waterford City & County Council. On both occasions the local authority highlighted the area as an important fisheries catchment with water quality and hydrology as two main considerations. The prospective applicant said aquatic surveys have been carried out and there is no evidence of Pearl Mussel in any watercourse draining the

site or along the proposed cable route. Given the salmonid watercourses, the prospective applicant said mitigation measures will be included within the EIAR. It was submitted that there are no significant concerns relating to drainage, hydrology or water quality.

The prospective applicant said a peat stability risk assessment will be carried out but that the risk of peat slippage is low, given the average peat depths on the site of approximately 0.15 metres.

It was submitted that two scoping exercises were completed, one during 2020 and the second in 2021. It said a number of responses were received and will be taken into consideration. The prospective applicant said certain prescribed bodies, as well as Bird Watch Ireland and Bat Conservation Ireland noted that they don't have the resources to respond to individual scoping requests.

The local authority scoping response was received which highlighted a number of key items including landscape, public consultation and traffic management.

The prospective applicant said it hopes to schedule a meeting with the Irish Raptor Study Group in the coming weeks.

In relation to public consultation, the prospective applicant said engagement is ongoing with the local community and it anticipates hosting a webinar within the next 4-6 weeks, an additional leaflet drop to a wider catchment area and face-to-face meetings before an application is submitted.

The prospective applicant gave an overview of the community fund associated with the proposed development and said it would be calculated in accordance with the Renewable Electricity Support Scheme (RESS).

Discussion

The following matters were discussed:

- In response to a query on the matter, the prospective applicant said it anticipates that the grid connection element will form part of the application.

- The prospective applicant said monitoring will be conducted in relation to proposed enhancement lands. In relation to hydrological monitoring, the prospective applicant said this would be conducted in accordance with the Water Framework Directive Hydrological Monitoring baseline. A hydrometric station is not proposed as part of this development.
- The prospective applicant said 3 borrow pits have been identified and the reinstatement of these pits are currently being assessed.
- The Board's representatives advised including an analysis of the carbon losses and gains of the proposed development in its entirety within the climate chapter of the EIAR.
- In response to a query on the matter, the prospective applicant said the construction compound is located close to a minor forestry drain and a 50-metre set back distance will be applied for all watercourses.
- In response to a query relating to the requirement of third-party lands for the turbine delivery route, the prospective applicant said these are currently being assessed.
- The prospective applicant said a cumulative and in-combination assessment will be completed on any proposed/existing wind farms in the area.
- In relation to the turbine output ranges, the Board's representatives advised that if a specific power rating is not finalised and ranges are brought forward, these ranges should be fully considered in the EIAR to allow the Board to examine and fully evaluate the likely impacts.

Conclusion

The record of the meeting will issue to the prospective applicant, and it will then be a matter for the prospective applicant to submit any comments on this if it wishes to do so. It will be a matter for the prospective applicant to revert to the Board if it requires a further meeting or if it wishes to close the pre-application consultation process.

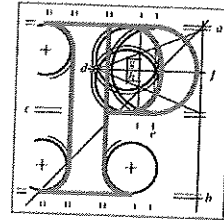
C Kellett 2/6/22

Ciara Kellett

Assistant Director of Planning

Our Case Number: ABP-309259-21

Your Reference: Coumnaagappul Wind Farm Limited



**An
Bord
Pleanála**

Fehily Timoney and Company
Core House
Pouladuff Road
Cork
Co. Cork
T12 D773

Date: 6th December 2022

Re: Proposed Coumnaagappul Wind Farm consisting of up to 11 turbines.
In the townlands of Coumnaagappul, Carrigbrack, Knockavanniamountain, Barricreemountain Upper and Glennaneanemountain, Skeehans, Lagg, Co. Waterford.

Dear Sir / Madam,

I have been asked by An Bord Pleanála to refer further to the above-mentioned pre-application consultation request.

Please find enclosed a copy of the written record of the third meeting of the 18th November, 2022.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

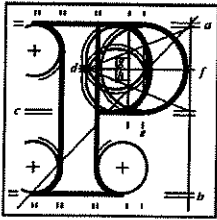
PC07

RMISH

P2360
3

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An
Bord
Pleanála

Record of Meeting
ABP-309259-21 3rd
meeting

Description	ABP-309259-21- Proposed Coumnagappul Wind Farm consisting of up to 11 turbines, Co. Waterford		
Case Type	Pre-application Consultation under Section 37B of the P&D Act 2000, as amended.		
1st / 2nd / 3rd Meeting	3 rd Meeting		
Venue	Virtually by Microsoft Teams		
Date	18/11/2022	Time	11:00am – 11:30am

Representing An Bord Pleanála		
Ciara Kellett, Assistant Director of Planning (Chair)		
Sarah Lynch, Senior Planning Inspector		
Sarah Caulfield, Executive Officer	s.caulfield@pleanala.ie	01-8737287
Representing the Prospective Applicant		
Michael O'Connor - Coumnagappul Wind Farm Limited		
Rita Mansfield - Fehily Timoney		
Jim Hughes – Fehily Timoney		

Introduction

The Board referred to its previous meeting with the prospective applicant of the 25th May 2022 and the record of this meeting. The Board asked if the prospective applicant had any comments it wished to make on the record of this meeting; the prospective applicant replied that it had no comments to make.

Presentation by the prospective applicant:

The prospective applicant provided a brief recap on the second meeting and gave an overview of the proposed development. The current proposal now consists of 10 turbines, with a maximum tip height of 185 metres. It was submitted that the candidate turbine is the Vesta V162 which has a flexible power rating of 6.0MW to 7.2MW and this range will be assessed within the EIAR. The prospective applicant said it will be seeking a 40-year permission.

The prospective applicant provided two maps which detailed the initial turbine layout and the current proposal. From a landscape and visual impact perspective, the prospective applicant said the decision was made to remove T3 and T9 from the project scope. Additionally, it was noted that T2 and T5 have been relocated slightly to the north.

It was submitted that ground investigation works are ongoing on the site in relation to the borrow pit locations in order to fully determine the potential for the excavation of aggregates.

The prospective applicant said EIAR scoping consultations have been completed. Several meetings were held with Waterford City & County Council with the most recent being in September 2022. This meeting focused primarily on the changes to the wind strategy within the recently adopted Waterford City & County Council Development Plan 2022-2028, in which the site has been identified as a 'no go area' for wind energy development. In response to consultations, TII have stated that key considerations relate to the delivery route, grid route and any haul routes associated with the project.

In relation to turbine delivery routes, the prospective applicant said the route will depart from Waterford Port, join the N29, turn right onto the N72 and then onto local

and regional roads before accessing the site. Minor works will be required at pinch points along the route, but the prospective applicant said these works are temporary in nature and would be replaced following the turbine delivery.

Regarding the Wind Energy Strategy, the prospective applicant said the site was previously designated as a 'preferred' area for wind energy development within the 2011-2017 Development Plan but this designation has changed to a 'no go area' within the new Waterford City & Council Development Plan 2022-2028. The prospective applicant said these 'no go areas' are not defined within the new Energy Strategy, but the previous strategy did provide a definition which they are using as a guide and will demonstrate within the EIAR that the proposed development is fit for purpose in this specific location. It was noted that the key justification would be landscape and visual given the location on the foothills of the mountains and ability to utilise the natural horseshoe valley. Additionally, the prospective applicant said the area is sparsely populated with only 39 properties located within 2 kilometres of the site. These properties are mainly located to the west with most of the wind turbines located to the east.

In relation to Ecology, it was submitted that there is high level of burning in upland areas which has caused significant damage on the landscape and scarring of habitats. It said the proposed development provides several opportunities for enhancement of land and habitats on the site.

Regarding Ornithology, it was noted that the lands are of low to moderate importance for bats and birds. A Collision Risk Model has been prepared which shows a low collision risk on the site, except for Kestrel and Golden Plover which are slightly higher.

Following the relocation of T2 to the north, it is now located on the boundary of a different water catchment, which is designated for Margaritifera Fresh Water Pearl Mussel. The prospective applicant said all construction and environmental mitigation will be adopted to ensure sedimentation of this watercourse does not occur.

The prospective applicant said LVIA (Landscape and Visual Impact Assessment) has been completed and consists of approximately 30 photomontage viewpoint locations providing a representation of views from upland, lowland and coastal

areas. Four viewpoints were presented to the Board's representatives (from north, south, east and west).

The prospective applicant is of the opinion that the proposed development is well positioned from an LVIA perspective, and the proposed development is justifiable given the low population density in the area, the natural topography, and the wind optimisation, notwithstanding the designation as a 'no go area'.

Discussion

The following matters were discussed:

- In response to a query on the matter, the prospective applicant said they have not received any feedback to-date from the Irish Raptor Study Group.
- In relation to the borrow pits, the prospective applicant said site investigations are ongoing on the site in relation to the true potential for rock excavation.
- The prospective applicant confirmed that the peat on the site is very shallow and said a peat stability risk assessment has been completed.
- In response to a query on the matter, the prospective applicant said the potential enhancement areas would be included within both the EIAR and NIS.
- The prospective applicant said public consultation is ongoing and included the circulation of a 12-page newsletter, an online webinar and an in-person event. An online exhibition is expected to launch imminently, and a further webinar and in-person event is anticipated in January 2023.
- In relation to the designation within the Wind Energy Strategy, the prospective application said Waterford City & County Council advised providing robust justification for the development and a robust LVIA.
- In relation to the 40-year permission duration, the Board noted that the standard time-limit is 30 years and advised providing reasoning for this extra time.
- The prospective applicant said it hopes to submit the planning application in Q1 2023.

Conclusion

The record of the meeting will issue to the prospective applicant, and it will then be a matter for the prospective applicant to submit any comments on this if it wishes to do

so. It will be a matter for the prospective applicant to revert to the Board if it wishes to close the pre-application consultation process.

C Kellett 6.12.22

Ciara Kellett

Assistant Director of Planning



**CONSULTANTS IN ENGINEERING,
ENVIRONMENTAL SCIENCE
& PLANNING**

www.fehilytimoney.ie

 **Cork**

 **Dublin**

 **Carlow**

