

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependent on its **Context, Character, Significance, and Sensitivity**, as outlined in the EPA EIAR Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the EPA EIAR Guidelines and includes the **quality, significance, extent, probability, type and duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity "*..which may be relevant under 'Population and Human Health' and 'Landscape'.*"

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc.

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Impacts

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIA Screening Report.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

Mitigation & Monitoring

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy.

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact.

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

With regard to Monitoring, Article 8a of the EIA Directive requires that:

1. *'The decision to grant development consent shall incorporate at least the following information ...*

(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, Environmental Surveying and Monitoring, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed [here](#). The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed [here](#).

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Assemblies

Regional Assemblies can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) should be consulted.

Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.



Niamh McHugh
MKO
Tuam Road,
Galway, H91 VW84

31 August 2023

Re: Informal EIA Scoping Request for Proposed Extension of Operation of the existing Castledockrell Wind Farm, Co. Wexford

Your Ref: 210847
Our Ref: 23/230

Dear Niamh,

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 gather various data for that purpose. Please see our [website](#) for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your email received on the 23 August 2023, concerning the EIA Scoping Request for Proposed Extension of Operation of the existing Castledockrell Wind Farm, Co. Wexford, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit for Co. Wexford was carried out in 2019. The full report details can be found at [here](#). **Our records show that that there are no CGSs in the vicinity of the wind farm.**

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our [Map viewer](#) which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.



The Groundwater Data Viewer indicates aquifers classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' underlie the wind farm.

The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx>

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)



Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological Survey Ireland Planning Team at GSIPlanning@gsi.ie.

Yours sincerely,

Geoheritage and Planning Programme

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

Niamh McHugh

From: DECC GSI Planning <GSIPlanning@GSI.ie>
Sent: 29 November 2023 13:45
To: Niamh McHugh
Cc: DECC GSI Planning
Subject: RE: [23/230] 210847 - Proposed Extension of Life to Castledockrell Wind Farm, Co. Wexford

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Your Ref: 210847
Our Ref: 23/230

Dear Niamh,
Thank you for your email regarding the proposed extension of life to Castledockrell Wind Farm, Co. Wexford. Geological Survey Ireland have no further comments to make since our last response 23/230.
Yours sincerely,
Trish Smullen



Trish Smullen Geoheritage & Planning.

Geological Survey Ireland, Booterstown Hall, Booterstown Ave., Co. Dublin A94 N2R6.

Email: trish.smullen@gsi.ie www.gsi.ie

A division of the Department of the Environment, Climate and Communications.

From: Niamh McHugh <n timer> nhmchugh@mkoireland.ie>
Sent: Wednesday 29 November 2023 10:57
To: DECC GSI Planning <GSIPlanning@GSI.ie>; Patricia Smullen (DECC) <Trish.Smullen@gsi.ie>
Subject: FW: 210847 - Proposed Extension of Life to Castledockrell Wind Farm, Co. Wexford

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Ms. Smullen,

In relation to the attached Scoping Document and the below email, I wish to inform you that the Applicant for this project is now seeking a **20-year extension to the operational life of the Existing Castledockrell Wind Farm, Co. Wexford.**

If you have any further comments in relation to this project, please don't hesitate to respond.

Kind regards,
Niamh

Niamh McHugh BSc. (Env)
Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611

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From: Niamh McHugh

Sent: Wednesday, August 23, 2023 12:31 PM

To: GSI Planning <GSIPlanning@GSI.ie>

Cc: trish.smullen@gsi.ie

Subject: 210847 - Proposed Extension of Life to Castledockrell Wind Farm, Co. Wexford

Ms. Smullen,

Castledockrell Wind Group Ltd are proposing to apply to Wexford County Council to extend the operational lifetime of the existing Castledockrell Wind Farm, Co. Wexford for an additional 15 years after it's current planning permission period runs out in August 2025. The existing wind farm is located 8.1km west of Ferns and 6.5km south of Bunclody Co. Wexford. Further details on the proposed development can be found within the attached scoping letter.

If you have any comments or queries in relation to the attached scoping document, please don't hesitate to get back to me. All information will be gratefully received.

Kind regards,

Niamh

Niamh McHugh BSc. (Env)

Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84



Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611

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Niamh McHugh

From: MKO-Admin
Sent: 25 September 2023 14:33
To: Niamh McHugh; MKO Projects
Subject: FW: 210847 - Proposed Extension of Lifetime to Castledockrell Wind Farm, Co. Wexford
Attachments: EHS submission for Scoping Application Wexford 3376 (1).docx; HSE South Emergency Management Consultation Report EMENV 175.docx; ETHANE Aide Memoire 2.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Kind regards,
Olivia

Olivia Coen
Receptionist

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From: Kay OConnor <Kay.OConnor1@hse.ie>
Sent: Monday, September 25, 2023 2:23 PM
To: MKO-Admin <info@mkoireland.ie>
Cc: Jane Power <JaneM.Power@hse.ie>; Eve Smith <Eve.Smith@hse.ie>; Maryanne Horgan (Administrative Officer) <MaryAnne.Horgan@hse.ie>
Subject: Fwd: 210847 - Proposed Extension of Lifetime to Castledockrell Wind Farm, Co. Wexford

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Dear Sir/Madam,

Please find attached Environmental Health Service submission regarding 210847 Proposed Extension of Lifetime to Castledockrell Wind Farm.
Reports from HSE South Emergency Management are also attached.

Kind regards,

Kay O Connor
Senior Environmental Health Officer,
Larkin House,
Larkins Cross
Wexford
087 7998040
Sent from [Outlook](#)

From: Niamh McHugh [nhmchugh@mkofireland.ie]
Sent: 23 August 2023 12:32
To: EHO Wexford
Subject: 210847 - Proposed Extension of Lifetime to Castledockrell Wind Farm, Co. Wexford

Sir/Madam,

Castledockrell Wind Group Ltd are proposing to apply to Wexford County Council to extend the operational lifetime of the existing Castledockrell Wind Farm, Co. Wexford for an additional 15 years after it's current planning permission period runs out in August 2025. The existing wind farm is located 8.1km west of Ferns and 6.5km south of Bunclody Co. Wexford. Further details on the proposed development can be found within the attached scoping letter.

If you have any comments or queries in relation to the attached scoping document, please don't hesitate to get back to me. All information will be gratefully received.

Kind regards,
Niamh

Niamh McHugh BSc. (Env)
Environmental Scientist

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"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seans gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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HSE EIA Scoping
Environmental Health Service Submission Report

Date: 25/09/2023

Our reference: EHIS 3376

Report to: MKO, Tuam Road, Galway, H91 VW84. info@mkoireland.ie

Type of Consultation: EIA Scoping

Proposed development: Informal EIA Scoping Request for Proposed Extension of Operation of the existing Castledockrell Wind Farm, Co. Wexford

Details of the application were circulated to the following HSE stakeholders on the 23rd of August 2023:

- HSE South Emergency Management – David O’Sullivan
- Estates – Helen Maher/Stephen Murphy
- Director of National Health Protection – Eamonn O’ Moore
- CHO – Kate Killeen White



General Introduction

Planning permission is being sought from WCC to enable the existing wind farm to continue operating in its current form for an additional 15 years. It is not proposed to alter the current 12 no. turbine layout or infrastructure and no groundworks are proposed.

Description of the Development Site Castledockrell Wind Farm is located 8.1km west of Ferns, and 6.5km south of Bunclody, Co. Wexford and is based within agricultural land. The wind farm site covers approximately 97 hectares (ha) with a development footprint of 3.1 ha. The development consists of 12 no Enercon E70 model wind turbines (84.5 hub, 71m rotor diameter). The turbines are spread across the site in a linear fashion, each coming off a central spinal road.

The purpose of the EIAR will be to document the current state of the environment and to assess what the future state would be if the existing development is (i) decommissioned prior to 2025 or (ii) continues to operate for the proposed extended lifetime period, in an effort to quantify the likely significant effects, if any, of the Proposed Development on the environment. The objective of this process is to determine whether any significant negative effects to the environment are likely to result from the extended operation of the wind farm, and to facilitate the most efficient and positive design of any additional mitigation measures that may be necessary in order to ensure protection of the environment. As part of the assessment included within the EIAR, a 'Do-Nothing' alternative scenario will be included in each assessment chapter. This 'Do-Nothing' alternative will detail what will happen to the existing wind farm development if no extension of lifetime was sought. In this scenario, the existing wind farm would be decommissioned prior to August 2025 in accordance with the current planning conditions.

The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR:

- Public Consultation
- Population and Human Health
- Water (Hydrology and Hydrogeology)
- Land and Soils
- Air, Dust and Odour
- Climate Change and Opportunity for Health Gain
- Noise and Vibration
- Waste Management



- Ancillary Facilities
- Cumulative Impacts

Public Consultation

The applicant should consider the appointment of a community liaison officer. Early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed. All parties affected by the proposed development, including those who may benefit financially from the project, must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas. Sensitive receptors and other stake-holders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed wind farm development in the future. With the lifting of restrictions around public gatherings as a result of Covid 19 prevention measures there should be no barrier to holding public consultation events albeit within current government guidance at the time. Meaningful public consultation, where the local community is fully informed of the proposed development must be undertaken. Members of the public should be given sufficient opportunities to express their views on the proposed development. We would encourage community engagement with regard to continuation of the lifetime of the windmills in accordance with Good Practice for Wind Energy Development Guidelines³⁶, issued by the Department of Communications, Climate Action and Environment (December 2016).

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA. To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed development. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website. The EIAR should state the period of planning permission sought, the length of time construction is estimated to take, and if it is anticipated that the renewable energy development will be decommissioned and removed or will continue to operate (following any further planning consent) at the end of this period of planning permission (should permission be granted).

Decommissioning

The EIAR should detail the eventual fate of wind turbines, substation, and energy storage batteries and associated material, i.e. will the material be recycled or how will it be disposed of.

Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines.



The EIAR should indicate the proposed future use of the development site at the end of the planning permission period.

Siting, Location and details of Turbines/Energy Storage Batteries

The EIAR should include a map and a description of the current location's of each of the wind turbines, substation, energy storage locations and associated developments.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The EHS recommends that alternative renewable energy options to on- shore wind farms should be assessed as part of the EIAR. As this site is already in place this application may not be relevant.

Noise & Vibration

The potential impacts for noise and vibration from the development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration. A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the background levels.

In addition, an assessment of the predicted noise impacts during current operational phase of the proposed renewable energy development must be undertaken which details the change in the noise environment resulting from the proposed development.

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

https://www.housing.gov.ie/sites/default/files/publicconsultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

Shadow Flicker

It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The



assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment. It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker.

Air Quality

As the wind turbines are in place the construction phase is not relevant. However maintenance works will be carried out from time to time therefore mitigation measures are required in relation to dust.

Measures should include:

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads
- Wheel washing facilities at site exit
- Restrict speed on site
- Provide covers to all delivery trucks to minimise dust generation
- Inspect and clean public roads in the vicinity if necessary
- Material stockpiling provided with adequate protection from the wind
- Dust monitoring at the site boundary
- Truck inspection and maintenance plan
- Details of a road maintenance agreement between the operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project .

Surface and Ground Water Quality

The development has the potential to have a significant impact on the quality of both surface and ground water.

All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. Measures to ensure that all sources and supplies are protected should be described.

The Environmental Health Service recommends that a walk-over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes. Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures. Any impacts on surface water as