- Decisions around development and deployment of new technologies relating to areas such as wind, smart grids, electric vehicles, buildings, ocean energy and bio energy.
- Legal and regulatory frameworks to meet demands and challenges in transitioning to a low carbon society.

Relevant to the subject development, the **National Strategic Outcome 8** (*Transition to Sustainable Energy*), notes that in creating Ireland's future energy landscape, new energy systems and transmission grids will be necessary to enable a more distributed energy generation which connects established and emerging energy sources, i.e. renewables, to major sources of demand. The successful transition to a low-carbon power system will depend on the pillars of 1) *Sustainability*, 2) *Security of supply* and 3) *Competitiveness*. A common theme underpinning these pillars is the need for a fit-for-purpose transmission and distribution energy network. Specifically, the NPF states that reinforcement of the distribution and transmission network to facilitate planned growth and distribution of a more renewables focused source of energy across the major demand centres, e.g. the functional purpose of the extant grid connection.

Ireland's national energy policy under **Objective 55** aims to '*promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050*'. The NPF aims to ensure that decisions that are made today meet our future needs in a sustainable manner.

> *"The manner in which we plan is important for the sustainability of our environment. Our planning system has influence across a wide range of sectors, both directly and indirectly and interacts with many common issues related to effective environmental management, including water services, landscape, flood risk planning, protection of designated sites and species, coastal and marine management, climate mitigation and adaptation, and land use change."*

An overarching objective of the NPF is to foster a transition toward a low carbon, climate-resilient society, which reflects the policy ethos established at the European level of governance (e.g. climate change and renewable energy targets – Section 2.2 & 2.3). In this regard, one of the key themes of the NPF is the realisation of an Ireland which has a secure and sustainable renewable energy supply and the ability to diversify and adapt to new energy technologies. The NPF references the National Climate Policy Position (superseded by the then CAP 2019) which established the fundamental objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. The NPF emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply for the country and acknowledges that *"rural areas have significantly contributed to the energy needs of the country and continue to do so"*. In this regard, the NPF states:

> *"In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment".*

The NPF acknowledges that greenhouse gas emissions from the energy sector must be reduced by at least 80% by 2050 when compared to 1990 levels while ensuring a secure supply of energy exists. New energy systems and the maintenance / safeguarding of existing grid assets will be necessary for a more distributed, renewables focused energy system required to harness Ireland's considerable indigenous energy sources and *"connect the richest sources of that energy to the major sources of demand"*.

The Proposed Development represents a significant multi-million investment in a rural area, in the renewable energy industry which is essential for diversifying the energy sector, contributing to innovation in the rural economy and delivering on climate and energy targets. National Planning **Objective 21** of the NPF aims to *'Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and*

***sustainability'*. The Proposed Development is directly supporting economic growth in rural Co. Wexford while also contributing to national, regional and local climate and renewable energy targets.**

In regard to the above, it is clear that the provision of new renewable energy generation is in line with the aims and objectives of the NPF which seeks to transition to a low carbon economy.

Draft Revised National Planning Framework

The Government has agreed to the publication of a draft revision of the National Planning Framework (NPF) for public consultation. The Draft Revision of the NPF focuses on the need to update the Framework published in 2018 in order to appropriately reflect changes to Government policy that have taken place since the initial publication six years ago, such as climate transition.

There is an increased emphasis on the importance of the renewable energy development and infrastructure needed to support this. Chapter 9 acknowledges that the ***"accelerated delivery of the additional renewable energy generation is... essential for Ireland to meet its climate targets."*** A number of new or amended National Policy Objectives (NPOs) have been proposed in order to achieve this objective.

Table 9.1 sets regional renewable energy capacity allocations for wind and solar energy. This was one of the key actions for 2024 under the Climate Action Plan 2024. The Southern Region, in which the Proposed Project is located, is allocated an additional 978MW of wind energy. Under NPO 75, the Southern Regional Assembly will be required to plan how and where to deliver the required capacity by identifying capacity allocations for each Local Authority in its area. Clare County Council will then be required to plan for the delivery of the energy capacity target that they have been allocated, under NPO 76.

The introduction of renewable energy targets represents a more active and prescriptive approach to land use planning for renewable energy development. If adopted in the final version of the Revised NPF, it will align the national target of 9GW of onshore wind energy with the policies and objectives of Local Authorities.

National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (NDP) was published on 4th October 2021 and sets out the major public investment projects identified by Government which are to play a significant role in addressing the opportunities and challenges faced by Ireland over the coming years such as Covid-19, Brexit, housing, health, population growth, and most relevant to the subject development, climate change. It is stated that the NDP 2021 – 2030 will be the ***'largest and greenest ever delivered in Ireland'***, and in this regard, the NDP highlights that extensive consultation was undertaken to ensure that the plan adequately supports the implementation of climate action measures. Reflecting on the recent publication of the IPCC's 6th Assessment Report, the NDP notes that the Irish Government is fully committed to 'playing its part' to ensure that the worst climate change damage can be avoided, e.g. significant reductions in CO_2 and other greenhouse gas emissions as assisted by the achievement of both European and National renewable energy targets. Specifically, the NDP states that,

> ***"The next 10 years are critical if we are to address the climate crisis and ensure a safe and bright future for the planet, and all of us on it.***
>
> ***The investment priorities included in this chapter [Ch. 13] must be delivered to meet the targets set out in the current and future Climate Action Plans, and to achieve our climate objectives. The investment priorities represent a decisive shift towards the achievement of a decarbonised society, demonstrating the Government's unequivocal commitment to securing a carbon neutral future."***

Notwithstanding this, the NDP acknowledges that it is not its role to set out a specific blueprint for the achievement of Ireland's climate targets; but as noted above, facilitate capital investment allocations for the climate and environmental strategic priorities.

One of the NDP's strategic climate priorities in the need for low-carbon, resilient electricity systems; specifically, the plan commits to increasing the share of renewable electricity up to 80% by 2030. This is characterised by the NDP as an '*unprecedented commitment to the decarbonisation of electricity supplies*', which is certainly an ambitious and an explicit driver for the continued operation of renewable generators such as the Proposed Development. The focus of investment in renewable energy infrastructure is to contribute to a long-term, sustainable and competitive energy future for Ireland.

2.5.1.2 Project Compliance with the National Planning Policy

With regard to the above, it is considered that the proposed wind energy development is in line with and supported by the National Planning Framework and the National Development Plan.

The National Planning Framework projects a population increase of 1 million people by 2040 and therefore recognises the strain and demand this will put on Irelands energy system. In order to ensure Ireland delivers on our renewable energy and carbon emission reduction targets, the NPF recognises the need for increased renewable energy onto the national grid. This shift from fossil fuels is dependent upon schemes such as the one proposed to generate renewable energy. Given the projected population increase, it is considered that if the share of renewable energy onto the grid is not increased, Ireland will fail to reach the National and International targets on emission reductions. Should the Proposed Development be granted planning permission, the 11 no. wind turbines, with an electricity generation capacity of 25.3MW, will continue contribute to Ireland's national targets and support the country in meeting its renewable energy and carbon emission reduction goals at the EU level. The Proposed Development is directly supported by National Planning Objective 21, 54, and 55.

The National Development Plan 2021 - 2030 is clear in its priority to reach a low-carbon, climate resilient society over the lifetime of the plan. The Proposed Development, if permitted, will continue to provide clean, renewable electricity to the national grid, furthering development objectives of the NDP, namely the target to increase the share of renewable electricity up to 80% by 2030.

2.5.2 Regional Policy Context

Regional Spatial & Economic Strategy for the Southern Region

The Southern Regional Assembly (EMRA) was established in 2015, is part of the regional tier of governance in Ireland and is primarily focused on the preparation and implementation of Regional Spatial and Economic Strategies (RSES), integration of Local Economic and Community Plans (LECPs), management of EU Operational Programmes, EU project participation, implementation of national economic policy, and working with the National Oversight and Audit Commission.

The RSES seeks to achieve balanced regional development and full implementation of Project Ireland 2040 – the National Planning Framework. It will be implemented in partnership with local authorities and state agencies to deliver on this vision and build a cohesive and sustainable region.

> *"The RSES primarily aims to support the delivery of the programme for change set out in Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan 2018-27 (NDP). As the regional tier of the national planning process, it will ensure coordination between the City and County Development Plans (CCDP) and Local Enterprise and Community Plans (LECP) of the ten local authorities in the Region."*

The RSES is committed to the implementation of the Climate Action Plan 2019 (superseded by CAP 24) by playing its part in the development of wind, wave, tidal, solar, hydro, and bio energy. The

ambition is reflected in the Regional Policy Objectives (RPO's) which sets out the key regional policies for the 12-year lifetime of the plan. RPO 87: Low Carbon Future, states:

> *"The RSES is committed to the implementation of the Climate Action Plan 2019 by playing its part in the development of renewable energy. This is clearly reflected in the Regional Policy Objectives (RPO's) which sets out the key regional policies for the lifetime of the plan, from 2018 – 2030"*

With regards to climate change the RSES notes that:

> *"All global risks of climate change are risks to the Southern Region. The Southern Regional Assembly is committed to plays its role to put in place a high-level regional strategy for transition to a low carbon economy and society across all sectors."*

As noted and recognised by the RSES, Ireland and the EU are signatories to the Paris Agreement, a legally binding international agreement to restrict global temperature rises to below 2°C above pre-industrial levels, and to limit any increase to 1.5°C to significantly reduce the risks and impacts of climate change. It is further noted that *'Ireland's international commitments also extend to the UN's Sustainable Development Goal 13, to 'take action to combat climate change and its impacts."*

Chapter 5 of the RSES notes detail's the regions plans and objectives with regards to the environment. The RSES focus includes the following areas:

- Renewable Energy
- Energy Efficiency
- Sustainable transport
- Agriculture
- Forestry
- Climate resilience

The following Regional Policy Objectives have been listed with regards to climate change: ***RPO 87 Low Carbon Energy Future:*** *The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.*

RPO 88 National Mitigation Plan and National Adaptation Framework: *The RSES is committed to the implementation of the National Mitigation Plan and National Adaptation Framework: Planning for a Climate Resilient Ireland to enable the Region transition to a low carbon, climate resilient and environmentally sustainable economy. It is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.*

RPO 90 Regional Decarbonisation*: It is an objective to develop a Regional Decarbonisation Plan to provide a framework for action on decarbonisation across all sectors. The Regional Decarbonisation Plan shall include existing and future targets for each sector and shall be prepared with key stakeholders, including the Climate Action Regional Offices, and shall identify the scope and role of the Plan, the requirements for SEA, AA and the timescale for its preparation. Implementation mechanisms and monitoring structures for the Plan should also be established.*

The region has ample resources of wind, solar and ocean energy to provide a significant amount of renewable energy. Over the next ten years there is a predicted growth in electricity demand to align with the Climate Action Plan. Extra generating capacity will be required to accommodate this demand.

Wind energy is recognised as a major source of renewable energy generation capable of providing clean electricity to the grid and meeting the county's energy needs.

> *"The RSES recognises and supports the many opportunities for wind as a major source of renewable energy. Opportunities for both commercial and community wind energy projects should be harnessed, having regard to the requirements of DoHPLG Guidelines on Wind Energy. Wind Energy technology has an important role in delivering value and clean electricity for Ireland."*

The following Regional Policy Objectives have been listed with regard to renewable energy:

- ***RPO 95 Sustainable Renewable Energy Generation:*** *It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.*
- ***RPO 96 Integrating Renewable Energy Sources:*** *It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.*
- ***RPO 97 Power Stations and Renewable Energy:*** *It is an objective to support the sustainable technology upgrading and conversion of power stations in the Region to increase capacity for use of energy efficient and renewable energy sources.*
- ***RPO 98 Regional Renewable Energy Strategy:*** *It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.*
- ***RPO 99 Renewable Wind Energy:*** *It is an objective to support the sustainable development of renewable wind energy (on shore and off shore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.*
- ***RPO 100 Indigenous Renewable Energy Production and Grid Injection:*** *It is an objective to support the integration of indigenous renewable energy production and grid injection.*

Regional Policy Objectives 95 – 100 reflect the strong support for renewable energy throughout the RSES. The Proposed Development will continue to generate renewable electricity contributing to the objectives of the RSES. The Proposed Development is therefore in alignment with policy at a regional level.

The RSES also acknowledges the need to develop a strong grid to support the integration of renewable energy on to the national electricity grid. The RSES sets out a number of infrastructural RPOs, relevant to the Proposed Development which indicate that the Region's continued support and investment in renewable energy generation:

- ***RPO 220 Integrated Single Electricity Market (I-SEM):*** *It is an objective to support the Integrated Single Electricity Market (I-SEM) as a key priority for the Region and seek the sustainable development and reinforcement of the energy grid including grid connections, transboundary networks into and through the Region and between all adjacent Regions subject to appropriate environmental assessment and planning processes.*

- ***RPO 221 Renewable Energy Generation and Transmission Network: a. Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network; b. The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid. The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported, The RSES supports the Southern Region as a Carbon Neutral Energy Region.***

- ***RPO 222 Electricity Infrastructure: It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.***

2.5.2.2 Project Compliance with Regional Planning Policy

The Southern Regional Assembly states that its region has a crucial role to play in Irelands transition to a low carbon future. In continuing to utilise the wind energy resource at Castledockrell, the Proposed Development will directly contribute to the achievement of a sustainable, secure and resilient energy supply in a manner consistent with the proper planning and sustainable development of the area/region. In the region, a noticeable trend has emerged to recognise and take advantage of emerging opportunities related to the shift towards a decarbonized economy, particularly in the realm of renewable energy generation and therefore the proposal is considered to be in line with Regional Policy.

2.5.3 Local Policy Context

2.5.3.1 Wexford County Council

The Wexford County Development Plan 2022-2028 (CDP) was adopted by the Elected Members of Wexford County Council on Monday, 13th June 2022 and came into effect on Monday, 25th July 2022.

In Chapter 2 of the CDP, Wexford County Council outlines the council's vision to facilitate a transition to a low carbon economy. **Objective CA01** aims to enable '*the decarbonisation of the county's economy and reduces the county's carbon footprint in support of national targets for climate mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions*'. It is recognised that renewable energy developments play a key role in the County's transition to a low carbon economy. **Objective CA16** seeks '*to support change across business, public and residential sectors to achieve reduced greenhouse gas emissions in accordance with current and future national targets, improve energy efficiency and* ***increase the use of renewable energy*** *sources across the key sectors of* ***electricity supply****, heating, transport and agriculture*' (emphasis added).

Objective CA04 aims to '*implement the Energy Strategy contained in Volume 10 of the Wexford County Development Plan to facilitate the transition to a low carbon county*'. The vision of the Energy Strategy is *'to maximise Wexford's renewable energy potential and its transition to becoming a more energy secure, low carbon county in line with national energy targets whilst balancing the need to protect the environmental, social and heritage assets of the county'*. The provisions of the Energy Strategy are outlined in the following section.

Wexford County Council Energy Strategy

Volume 10 of the current CDP comprises an 'Energy Strategy' which details the policies and objectives for the County relating to renewable energy, including wind, for the period of the Development Plan. It includes an energy expectation for the County to 2027 which includes "***A reduction in demand for non-renewable energy sources, such as coal, oil and gas, and an increased demand for electricity from all sectors, leading to cleaner, more sustainable energy usage across the county.***" Onshore wind is noted as the main source of renewable energy within the County. The Strategy acknowledges the role repowering will play in meeting targets. The most pertinent objectives are as follows:

- **Objective ES07**: Ensure the security of energy supply by supporting the development of wind energy resources in County Wexford at appropriate scales and in appropriate locations, subject to compliance with normal planning and environmental criteria and the development management standards contained in Section 5.7.
- **Objective ES08:** Aim to achieve the target set out in the Renewable Energy Strategy, to enable County Wexford to make the initial steps toward a low carbon economy by 2027.
- **Objective ES09:** Facilitate wind energy development on appropriate sites in the county and work with the relevant agencies to encourage investment in research and technology associated with wind farms and other renewable energy technology.
- **Objective ES10**: Favourably consider proposals for the development of infrastructure for the production, storage and distribution of electricity through the harnessing of wind energy in appropriate sites and locations, subject to relevant policy, legislation and environmental considerations and the development management standards contained in Section 5.7.
- **Objectives ES15:** Consider the re-powering (by replacing existing wind turbines) and extension of existing wind farms. Applications on such sites will each be assessed on their merits, demonstrate that the equipment is upgraded to the best available technology and will be subject to the development management standards contained in Section 5.7 (see Table 8).

The Energy Strategy sets renewable energy targets based on the most likely energy scenario modelled in Ireland's National Energy and Climate Plan (NECP) 2021-2030. Installed capacity and future projects are also considered in the targets. It is noted that the targets are based on the national target for RES-E of 70% set in the Climate Action Plan 2019, which was in place at the time the analysis. The current RES-E target is 80%.

The relevant targets are as follows:

- RES-E: The Strategy sets a target of 100% renewable energy by 2031 which is to be met through a combination of renewable energy developments. To achieve this target, it is projected that county Wexford would need to have an installed onshore wind energy capacity of 193.09 MW by 244.22 MW by 2031. As of 2021, the county had an installed capacity of 182.46MW.

The Development Plan divides the County into the following three areas for the purposes of wind energy development: Acceptable in Principle, Open for Consideration and Not Normally Permissible. The Castledockrell Wind Farm site is currently zoned as ***'Not Normally Permissible'*** under the CDP. These areas are considered to be generally unsuitable for new wind farm development due to significant environmental, heritage and landscape constraints, housing density, distance from the grid and/or wind speed.

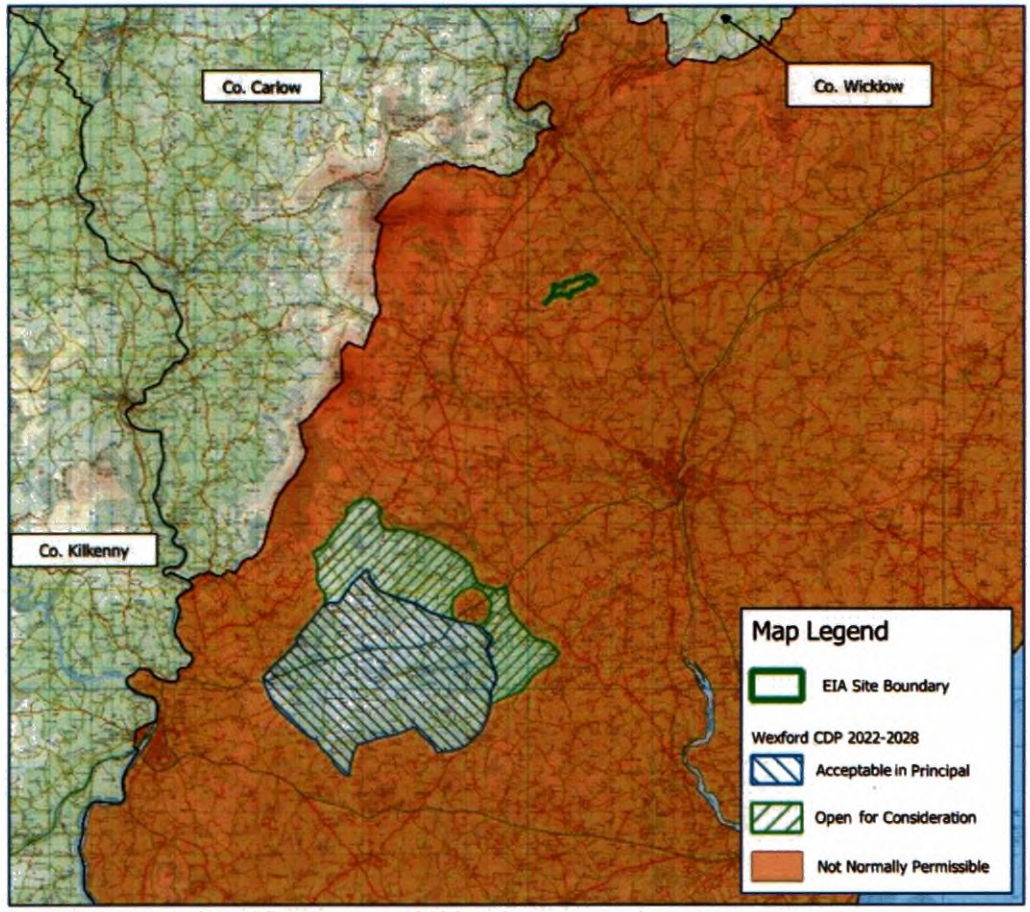

Figure 2-4: Castledockrell Wind Farm location and WCC wind energy zoning designations

The Wind Energy Methodology implemented by the Planning Authority in preparing their Energy Strategy included "*an analysis of key environmental, landscape, technical and economic criteria. GIS was utilised to examine a range of factors relating to wind energy development including wind energy potential (through the Wind Speed Atlas), grid infrastructure, natural heritage designations, urban settlements, landscape sensitivity and the location of existing and permitted wind farms. Each of these criteria were mapped and overlaid on GIS in order to determine the most suitable locations for wind farm development. The strategies of adjoining authorities were also examined to ensure consistency across boundaries.*"

In relation to existing wind farms, the Energy Strategy states that special cognisance has been taken of the existing operational and permitted wind farms and investments made by private developers, the ESB and EirGrid in terms of site access roads, electricity transmission and distribution infrastructure and appropriately sited substations.

In relation to the north of the County, where the Castledockrell Wind Farm is located, the Energy Strategy states that "*due to the number of existing wind farms, and having regard to the areas open for consideration for wind farm development in adjoining counties, it is considered that the north-west of the county has reached capacity in terms of wind farm development. Further wind farm development in this area may have potential adverse cumulative impacts. This area is also designated as 'Uplands' in the Landscape Character Assessment and is identified as having limited capacity to absorb development. The north-east of the county is also mainly designated as 'Uplands' and there are a number of settlements in this area which make it less suitable for wind farm development. The north of the county has therefore been included in the Not Normally Permissible area*".

With regards to the re-powering and the extension to existing Wind Farms in areas identified as *'Not Normally Permissible'*, the Energy Strategy states that applications will be assessed on a *'case-by-case basis'* and will be subject to the development management standards contained in Section 5.7 of the Energy Strategy. Further, the Energy Strategy states that '*any such applications should include details of how best available techniques are to be used to keep noise impacts to a minimum*'. It is demonstrated in Chapter 11 Noise, that Proposed Development is operating in compliance with Condition 8 of planning permission 2004/4702. Additional noise level monitoring at three further receptor locations, specifically considering AM concluded that with the inclusion of the applicable AM penalties to the measured overall noise levels from Castledockrell Wind Farm, compliance with the DoEHLG 2006 Guidelines with the methodology described in ETSU-R-97 and the IOA Good Practice Guide (i.e. background +5dB) was still demonstrated.

In the Planning Authority's assessment of repowering or extensions applications against the development management standards, the Planning Authority will have *'particular regard to the reasons why the area was identified as 'Not Normally Permissible'*. As outlined in the above, the main reason for the *'Not Normally Permissible'* zoning designation is the fact that the north-west of the county is deemed to have reached capacity in terms of wind farm development. As an existing wind farm, it is therefore submitted that the extension of operational life of the Castledockrell Wind Farm does not conflict with the *'Not Normally Permissible'* wind energy zoning designation and associated policy.

Wind Farm Development Management Standards

The following section provides an assessment of the Proposed Development against the wind farm development management standards set out in Wexford's Energy Strategy.

Pre-Planning Considerations
Engagement with Wexford County Council has been undertaken in the early stages of the preparation of application for the extension of operational life of the Proposed Development. The pre-planning meeting held with Wexford County Council is outlined in Section 3.2.2 below.

EIAR scoping was undertaken as part of the preparation of this EIAR. The bodies scoped as part of this exercise and the response received are provided in Section 3.1.2 below.

Consultation with the Local Community
Details of engagement with the local community are outlined in Section 3.2.1 below. Further details are provided in the Community Engagement Report in Appendix 2-2. The Proposed Development has been financially contributing to the groups and organisations in the local area since the wind farm's commissioning in 2011. It is intended to double the annual contribution made to the above organisations on receipt of this planning permission for the Proposed Development.

Duration of Permission
Planning permission is sought for an additional 20 years from the date of the expiry of the current planning permission. The turbines are serviced and maintained regularly under the terms of the manufacturer's maintenance contract. A report was commissioned by the applicant to predict the operational lifetime of the wind turbines at Castledockrell Wind Farm. The report concludes that with the replacement of a single component (blade bolts), the wind turbines should have a lifetime of approximately 35 years. It is therefore, considered that an extension of operational life of 20 years is acceptable.

Siting, Layout and Design
For properties within 500m of the Proposed Development, letters of support are provided from the residents (with the exception of 1 property in probate at the time of application). These letters are included in Appendix 2-2, the Community Engagement Report, and as an appendix to the cover letter which accompanies the planning application. As demonstrated in Chapter 11 Noise and vibration, the Proposed Development is operating in compliance with Condition 8 of planning permission 2004/4702. Additional noise level monitoring at three further receptor locations, specifically considering AM

concluded that with the inclusion of the applicable AM penalties to the measured overall noise levels from Castledockrell Wind Farm, compliance with the DoEHLG 2006 Guidelines with the methodology described in ETSU-R-97 and the IOA Good Practice Guide (i.e. background +5dB) was still demonstrated.

Boundaries and Fencing
Fencing is limited to the Substation compound and the entrance gate.

Access Roads
Existing internal access roads are constructed of consolidated gravel with an average running width of 4.5m and a total length of c. 3.8km. Further detail on the internal access roads is provided in Chapter 4 of this EIAR. No new access roads are proposed.

Ancillary Structures and Equipment
The planning application for the Proposed Development seeks to extend the operational life of the wind turbines and other essential infrastructure such as the substation and internal electrical cabling. There is no permanent met mast on the site.

Shadow Flicker
Shadow flicker mitigation is already in operation at the Proposed Development site and will continue throughout any proposed extended operational period. With mitigation in place, the Proposed Development will be capable of meeting all required guidelines in relation to the shadow flicker thresholds set out in the 2006 DoEHLG Wind Energy Guidelines and the Draft Revised Wind Energy Development Guidelines 2019. Further detail in relation to shadow flicker and mitigation is provided in Chapter 5 Population and Human Health of the EIAR.

Noise
As demonstrated by Chapter 11 - Noise and Vibration of the EIAR, the Proposed Development is found to be in compliance with Condition 8 of Wexford County Council Planning Permission 2004/4702 at all four noise measurement locations. DoEHLG 2006 Guidelines with the methodology described in ETSU-R-97 and the IOA Good Practice Guide (i.e. background +5dB) has been demonstrated to be compliant at all receptor locations around the Proposed Development. Additional noise level monitoring at three further receptor locations, specifically considering AM concluded that with the inclusion of the applicable AM penalties to the measured overall noise levels from Castledockrell Wind Farm, compliance with the DoEHLG 2006 Guidelines with the methodology described in ETSU-R-97 and the IOA Good Practice Guide (i.e. background +5dB) was still demonstrated.

Electromagnetic Interference
In Chapter 5 Population and Human Health of the EIAR, it is concluded that the Proposed Development will have impact on telecommunications.

Grid Connection
The grid connection is not included within the application for the Proposed Development. However, the grid connection has been assessed as a cumulative project.

Financial Contributions
It is noted that, if consented, Wexford County Council may attach a condition relating to the financial contribution towards the capital cost of providing infrastructure in accordance with the Development Contribution Scheme.

Landscape Impact Assessment
The landscape and visual impact of the Proposed Development is assessed in Chapter 13 of this EIAR. The Chapter concludes that the Proposed Development is seen as a spatially coherent wind farm and the turbines are viewed in a linear array across the undulating landscape. The existing turbines are suitably sited and scaled within the landscape. Considering the limited visual exposure of the existing

turbines and relatively limited number of sensitive landscape and visual receptors impacted within the LVIA Study Area, the Proposed Development is deemed to be acceptable from a landscape and visual perspective. The cumulative impact of the Proposed Development and other wind energy developments has been assessed over a radius of 20km from the existing Castledockrell turbines.

Archaeology
Chapter 11 Cultural Heritage of this EIAR concludes that, as the Proposed Development comprises the continued operation of the existing wind farm and no works are proposed at the operational stage, no direct or indirect effects to the archaeological, architectural or cultural heritage resource are identified. Similarly, no additional cumulative effects on this resource are identified as a result of the Proposed Development. No potential effect as a result of the proposed decommissioning phase of the Proposed Development are identified.

Architectural Heritage
No Protected Structures, NIAH structures or historic gardens are located within the existing Wind Farm or EIAR Site Boundary. The nearest Protected Structure comprises All Saints' Catholic Church at Mountfin Upper, Castledockrell (Ref. WCC1099), located approximately 1.7km from the existing turbines.

Forest Clearance
No forest clearance is required for the Proposed Development.

Traffic Management Plans
As there is no construction activities proposed, there is no potential for construction related impacts on traffic or transport. The majority of the maintenance works on the site will be completed by a two-person team travelling in a light goods vehicle. Maintenance crews will be required onsite to complete major component replacements on a sporadic basis, e.g., turbine component changes or onsite control building maintenance. Typically, there are no more than two trips per day to the site made by car or light goods vehicle.

Waste Management Plans
The creation of waste material is limited as no construction is proposed as part of the Proposed Development. The Operational and Environmental Management Plan (OEMP), included in Appendix 4.3 of this EIAR, does include measures to ensure waste during the operation of the Proposed Development is correctly disposed of.

Environmental Impact Assessment
The Proposed Development meets the threshold for EIA and therefore this EIAR accompanies the planning application.

Construction and Environmental Management Plans
As the Proposed Development does not include any construction, a Construction and Environmental Management Plan has not been produced. However, an Operational Environmental Management Plan was prepared and is included in Appendix 4-3 of this EIAR.

Bats and Birds
The impact on birds is assessed in Chapter 7 Ornithology and bats in the Bat Report included as Appendix 6-1, both assessments conclude that the Proposed Development, provided that it is operated and decommissioned in accordance with the design, best practice mitigation and detailed monitoring programme that are described within this application, significant individual or cumulative effects on the identified Key Ornithological Receptors or bats are not anticipated.

Designated Sites
A Natura Impact Statement (NIS) was prepared and is submitted with the planning application. The NIS provided concludes that, with mitigation measures in place, the Proposed Development,

individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

Habitat Mapping
Habitats were classified in accordance with the Heritage Council's 'Guide to Habitats in Ireland' (Fossitt, 2000). Habitat mapping was undertaken with regard to guidance set out in 'Best Practice Guidance for Habitat Survey and Mapping' (Smith *et al*, 2011). Habitats considered to be of ecological significance and with the potential to be impacted as part of the Proposed Development were identified and classified as Key Ecological Receptors (KERs). Habitat mapping is included as Figure 6-5 to 6-7 in Chapter 6 Biodiversity.

Invasive Species
During the multi-disciplinary walkover surveys, a search for non-native invasive species was undertaken. No species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 were recorded during the surveys.

Landslide Susceptibility
The Proposed Development does not involve any construction works, including excavations or otherwise, that may have the potential to impact local soils or underlying geology. Historically, groundworks, including excavations for turbine foundations, and trenching for laying of cables, formed part of the construction of the wind farm in 2010. During the site walkover on the 26th of September 2023, no evidence of any geotechnical incidents or residual impacts to the land, soils and geology of the site was observed.

Construction
No construction will take place as part of the Proposed Development.

Monitoring
Monitoring will be conducted where required by appropriately qualified professionals. Reports prepared will be submitted to Wexford County Council for approval.

Decommissioning
Decommissioning details, which if consented would take place in 2045, are set out in Chapter 4 Description of this EIAR. A Decommissioning Plan is presented in Appendix 4-4 of this EIAR. The final Decommissioning Plan will be prepared in line relevant guidance and agreed with the Local Authority at least three months prior to decommissioning of the Proposed Development.

Replacement, Re-powering and Redevelopment
The application for the Proposed Development seeks to extend the operation of 11 no. wind turbines at the Castledockrell Wind Farm and for the permanent continued operation of the Castledockrell 110kV Substation. While the Proposed Development is located in an area classified as 'Not Normally Permissible', the Proposed Development should be considered on its merits and the findings of the EIAR.

Cumulative Impacts of Wind farms
A cumulative impact assessment was undertaken as part of this EIAR. Further details of the plans and projects considered are provided in Section 3.3 below and in Appendix 2-3 of this EIAR.

2.5.3.2 Compliance with Local Planning Policy

Having regard to the above, it is clear there is strong policy support for wind energy development and associated infrastructure at a local level and a commitment to shift to a low carbon economy and away from using fossil fuels. The Proposed Development will continue to contribute to decarbonisation of energy and will further contribute to the national, regional renewable energy and emissions reduction targets. Furthermore, it is the policy of the Wexford County Council to assess applications for repowering/ extensions of existing wind farms on its merits. With regard to the designation of the area

as 'Not Normally Permissible', it is clear that the underlying reason for this designation is that the north-west of the county is deemed to have reached its wind energy capacity. Given the fact that the Castledockrell Wind Farm is an existing wind farm, there is no potential for new cumulative effects to arise. The Proposed Development also complies with the Wind Farm Development Management Standards set out in the Energy Strategy and furthermore letters of support from dwellings within 500m are also included with the application. Therefore, the Proposed Development is considered to be compliant with the relevant provisions of the Wexford County Development Plan 2022-2028.

2.5.4 Other Relevant Material Considerations

DoEHLG Wind Energy Guidelines 2006

In June 2006, the then Department of Environment, Heritage and Local Government (DoEHLG) published '***Wind Energy Development Guidelines for Planning Authorities***' (the Guidelines) under Section 28 of the Planning and Development Act, 2000 (as amended). The aim of these guidelines was to assist the proper planning of wind power projects in appropriate locations around Ireland. The Guidelines highlight general considerations in the assessment of all planning applications for wind energy. They set out advice to planning authorities on planning for wind energy through the development plan process and in determining applications for planning permission. They contain guidelines to ensure consistency of approach throughout the country in the identification of suitable locations for wind energy development.

Each wind project has its own characteristics and defining features, and it is therefore impossible to write specifications for universal use. Guidelines should be applied practically and do not replace existing national energy, environmental and planning policy. While the 2006 Guidelines remain the relevant guidelines in place, at the time of lodgement, decision makers (Planning Authorities and An Bord Pleanála) are not bound to their provisions and they can (and do) consider updated standards/requirements/specifications in assessing impacts and the proper planning and sustainable development of the area.

Draft Revised Wind Energy Guidelines 2019

The Department of Housing, Planning and Local Government published the ***Draft Wind Energy Guidelines*** (referred to as the Draft Guidelines) in December 2019. The Draft Guidelines were open to public submissions up until the 19th of February 2020. These submissions are now being considered by the Department. At time of writing, the guidelines in place remain the 2006 Guidelines pending the Department publishing a final version of any revised guidance.

The Draft Revised Guidelines clearly sets out the recognition that the proper planning and sustainable development of areas and regions must be taken into account when local authorities prepare their development plans and assess planning applications, irrespective of the significant role renewable energy has to play in tackling climate change.

The Draft Revised Guidelines note that potential impacts of wind energy development proposals on the landscape, including the natural and built environment, must be considered along with the legitimate concerns of local communities. With this in mind, and in line with the previously stated "preferred draft approach", the 2019 Draft Revised Guidelines primarily focus on addressing a number of key aspects including, but not limited to:

- Acceptable noise thresholds and monitoring frameworks;
- Visual amenity setback;
- Control of shadow flicker;
- Compliance with Community consultation and dividend requirements, as included within the obligatory Community Report; and

- **Consideration of the siting, route and design of the proposed grid connection as part of the whole project.**

The submission period for the Draft Revised Guidelines closed in February 2020. Under the consultation it was evident that a number of submissions made appeared to have observations surrounding similar points, these include but are not limited to themes such as noise, visual amenity set back and shadow flicker. With regards to noise, a number of the received submissions noted that the provisions put forward in the Draft Revised Guidelines were unworkable, as such it was considered that should the noise measures be implemented there is the potential for an on-going impact on the development of onshore wind energy in the future. In relation to set back distances there was strong criticism with regards to this distance being measured to the curtilage of a property due to this measurement being ambiguous and difficult to implement. Furthermore, questions were raised surrounding the strict measures which have been put in place surrounding shadow flicker, the Draft Guidelines put forward the provision that '*there will be no shadow flicker at any existing nearby dwelling or other relevant existing affected sensitive property*'. While the overall provision is possible a number of clarifications were sought to ensure that this provision could be implemented in a reasonable manner.

At time of writing the Draft Guidelines are not yet finalised and are not in force, with the relevant guidelines for the purposes of section 28 of the Planning and Development Act 2000 (as amended) remaining those published in 2006. Notwithstanding this, however, due to the timelines associated with the planning process for renewable energy projects it is possible that an updated version of the Draft Guidelines may be finalised during the consideration period for the current Proposed Development. On the basis of the details available in the Draft Guidelines, it is anticipated that the Wind Farm Site will be capable of adhering to the relevant noise and shadow flicker standards through the implementation of the mitigation measures, albeit without sight of the final, adopted Guidelines the processes by which this compliance can be achieved cannot be confirmed at this stage.

IWEA Best Practice Principles in Community Engagement and Community Commitments 2013

IWEA extended its guidance with the publication of this Best Practice in Community Engagement and Commitment. IWEA and its members support the provision of financial contributions by wind farm operators to local communities and have sought to formulate best practice principles for the provision of a community commitment. The document sets out IWEA's best practice principles for delivering extended benefits to local communities for wind farm developments of 5 Megawatts (MW) or above. Best Practice Principles of community engagement when planning the engagement strategy and preparing associated literature are also outlined in the document. The aim of these guidelines is to ensure that the views of local communities are taken into account at all stages of a development and that local communities can share in the benefits.

Further details on the community engagement that has been undertaken as part of the Proposed Development are presented below.

DCCAE Code of Practice for Wind Energy Development Ireland - Guidelines for Community Engagement 2016

In December 2016, the Department of Communications, Climate Action and Environment (DCCAE) issued a Code of Practice for wind energy development in relation to community engagement. The Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in adherence with the best industry practices, and with the full engagement of local communities. Community engagement is required through the different stages of a project, from the initial scoping, feasibility and concept stages, right through construction to the operational phase. The methods of engagement should reflect the nature of the project and the potential level of impact that it could have on a community. The guidelines advise that ignoring or poorly managing community concerns can

have long-term negative impacts on a community's economic, environmental or social situation. Not involving communities in the project development process has the potential to impose costly time and financial delays for projects or prevent the realisation of projects in their entirety.

2.6 Planning History

2.6.1 Planning Applications with the application site boundary

A planning search was carried out through Wexford County Council's online planning portal in October 2024 for relevant planning applications within the red line planning application site boundary. 2 no. planning permissions were identified within the red line planning application boundary. All planning applications relate to the existing Castledockrell Wind Farm. The planning applications within the red line boundary are outlined in the table below.

Table 2-2: Planning applications within the red line planning application boundary

Pl. Ref.	Description	Decision
Pl Ref. 2004/4702 ABP Ref. PL26.211725	Erect eleven wind turbines and ancillary buildings, incidental site works, including site roads, in the townlands of Carranroe e.d. Castledockrell, Ballynelahillan e.d. Castledockrell, Kilcullen e.d. Ballindaggin, Sroughmore e.d. Ballindaggin, Tomatee e.d. Ballindaggin & Knockduff e.d. Ballindaggin. The tower heights will not exceed 85m and the rotor diameters will not exceed 72m. The anticipated output from the eleven turbines will be 22mw. This development requires an EIS. An EIS report was submitted to the planning authority with the application.	Granted by Wexford County Council on 16/03/2005. Appeal and granted by ABP 11/08/2005.
Pl. Ref. 2005/3945	Construct a 110kV sub-station and perimeter fence and incidental site works (to service Castledockrell Wind Farm). It will consist of a compound measuring approximately 39m x 18m, and in addition to electrical equipment, will contain a general purpose building measuring approximately 9.64m x 7.14m.	Granted by Wexford County Council on 27/01/2006.

2.6.2 Wind Energy Developments within 25km

A planning search was carried out to establish permitted and operational wind farms within 20km of the subject site. The search was carried out using the relevant local authority planning portals in March 2025 for relevant planning applications. In total, 14 wind energy developments within 25km were identified:

Table 2-3: Wind Farm developments within 20km

Pl. Ref.	Applicant	County	Wind Farm	Description	Decision	Status	Turbine No.
2113, ABP Ref: PL01.318705	Coillte CGA	Carlow	Craoghaun	Permission to develop a wind farm and associated works. The proposed development will consist of: - Construction of up to 7 no. wind turbines with a maximum overall blade tip height of up to 178m; - Construction of turbine foundations and crane pad hardstanding areas; - Construction of new site tracks and associated drainage infrastructure; - Upgrading of existing tracts and associated drainage infrastructure where necessary including upgrade of entrance onto L2026; - All associated drainage and sediment control including the installation of new watercourse or drain crossings and the re-use or upgrading of existing internal watercourse and drain crossings; - Construction of 1 no. permanent onsite 38kV electrical substation to ESBN specifications including: Control building with welfare facilities; - Electrical infrastructure; - Parking; - Wastewater holding tank; - rainwater harvesting; - Security fencing; - All associated infrastructure, services and site works; - 1 no. temporary construction site compound and associated ancillary infrastructure including parking; - 1 no. on site borrow pit; - Tree felling to facilitate construction and operation of the proposed development; - Installation of medium voltage (20/33kV) and communication underground cabling between the proposed turbines and the proposed on-site substation and associated ancillary works; - Erection of 1 no. permanent meteorological mast to a maximum height of 100m above ground level; - Upgrade of existing forest tracks and paths that shall be re-purposed as recreational amenity trails for community use including signage; - All associated site	Case is yet to be decided by ABP	In planning	7

Pl. Ref.	Applicant	County	Wind Farm	Description	Decision	Status	Turbine No.
				development works; - A 10 year planning permission and 35 year operational life from the date of commissioning of the entire wind farm.			
13256	Ballon Meats	Carlow	Ballon Meats Wind Turbine	Erect a 500kw wind turbine 80 metre high with a blade diameter of 39 metre, a new access roadway connecting to existing private road with underground ducting connecting to existing ESB Substation, and all associated site works.	Granted - 14/03/2014	Operational	1
11/280	Kilbranish Windfarm Ltd.	Carlow	Kilbranish Windfarm	To erect a wind turbine, site roads, electricity substation, and ancillary works in the townland of Kilbrannish North, Bunclody, Co. Carlow. The turbine will have a maximum hub height of 80m and a maximum rotor diameter of 90m. The anticipated output will be 2.5mw.	Granted - 19/06/2012	Operating	1
20110504	Knocknalour Wind Farm Ltd	Wexford	Knocknalour	Permission to develop a wind farm of up to 4 wind turbine generators to export electricity with a hub height of up to 85 metres a rotor diameter of up to 82 metres the construction of a crane hardstanding for each turbine, an electrical substation, underground cabling, site roads, and ancillary services. The development is located in the townland of Knocknalour, Bunclody, Co. Wexford. Existing planning permission for a total of 4 wind turbines (planning ref: 20032204 and 20091392) with a hub height of up to 80m and a rotor diameter of up to 72m are current on this land and should this application be approved only 4 wind turbines as detailed in this application will be considered.	Granted – 22/07/2011	Operational	4
20091730	Ballycadden Wind Farm Limited	Wexford	Ballycadden	A windfarm of up to 9 wind turbine generators to export electricity with a hub height of up to 85 metres a blade length of up to 41 metres the construction of an electrical substation, site roads, meteorological mast and ancillary services. An existing planning permission for a wind farm (ref 20022904 and An Bord Pleanála ref. Pl. 26.201448) is current on this land and should this application be approved only one of the developments will be constructed. The Wexford wind strategy map show the development location is within policy area 1 uplands which is an area open to consideration for wind farms. An environmental impact statement (EIS) has	Granted – 15/03/2010	Operational	9

Pl. Ref.	Applicant	County	Wind Farm	Description	Decision	Status	Turbine No.
				been prepared in respect of this development and this EIS has been submitted with the planning application.			
20090266	Wexwind Ltd	Wexford	Gibbert Hill	Erect six wind turbines not exceeding 80 metres hub height with a rotor diameter not exceeding 90 metres, and ancillary buildings and roadways.	Granted – 16/11/2009	Operational	6
20071625	James Osborne	Wexford	Gorey Business Park	Erection of a chinook 75 wind turbine within the boundaries of Gorey business park as part of the phased introduction of a renewable energy program and green initiative encompassing wind, solar, geo-thermal and wood chip energy production with a proposed design capacity provision of 50% of total current energy requirement which currently runs at 1000kw. Turbine tower to have height of 32.0m and blade diameter of 15.0m. Permission to allow for all associated site works and services.	Granted – 30/10/2007	Operational	1
20070008	Ballindaggin Green Energy Ltd	Wexford	Bola More	Erect six wind turbines and ancillary buildings including an ESB substation and incidental site works including site roads. The tower heights will not exceed 85m and the rotor diameters will not exceed 82m. The anticipated output from the six turbines will be approximately 14MW. An EIS has been submitted with this application.	Granted – 28/02/2007	Operational	6
20033444	Kate McCarthy	Wexford	Ballynancoran	Erect a wind farm consisting of 2 wind turbines and service trackways on the site. The developer has also applied to erect an electrical transformer compound, control housing and anemometer on the same site.	Granted – 30/04/2004	Operational	2
20034003	Connor Brennan	Wexford	Ballyduff	Erect two wind turbines not exceeding 85 metres hub height with a rotor diameter not exceeding 80 metres, and ancillary buildings and roadways. The maximum output of the wind farm will not exceed 5 megawatts.	Granted – 16/04/2004	Operational	2
201000733	Kenneth Rothwell	Wexford	Ballaman	Erect a wind farm consisting of 3 wind turbines and service roadways. The developer has also applied to erect an electrical transformer compound, control housing and anemometer.	Granted – 02/12/2003	Operational	2

Pl. Ref.	Applicant	County	Wind Farm	Description	Decision	Status	Turbine No.
014273, ABP Ref PL27.125044	Tom & Eileen Ryan	Wicklow	Cronelea Upper Wind Farm	Ref 014273: Construct 3 turbine windfarm, 3 Vestas V52-850KW Wind Turbines, crane hardstands, access tracks, cable trenches, electrical control room. Cronelea Upper, Shillelagh, Co. Wicklow.	Granted by ABP - 14/03/2002	Operational	3
014805	Douglas & Linda Wilson	Wicklow	Cronelea Wind Farm	Ref 014805: 4 wind turbines with a tower height not exceeding 67m & a rotor diameter not exceeding 71m & ancillary buildings & incidental site works to improve & extend existing access.	Granted - 10/01/2002	Operational	4
065517 141956	Bearna Gaoithe Teo Wind Farm Ltd. Betty Hedderman	Wicklow	Cronelea Upper Wind Farm 2	Ref 065517: for development of 2 wind turbines with service roadways Ref 141956: to construct a single wind generator with a max output set at 500kw. The development will consist of: - a single turbine with a max hub height of sixty five meters, and electrical switch room, an access track, associated infrastructure and all ancillary site works.	Granted - 25/10/2006 Granted - 11/03/2015	Operational	2
08527	Joseph & Noel Deacon	Carlow	Greenoge/ Kilbranish	Construction of a 4 M. Watt wind farm	Granted - 07/01/2001	Operating	4

2.7 Scoping and Consultation

2.7.1 Scoping

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to Environmental Impact Assessment (EIA). This process is conducted by contacting the relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment with the potential to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIAR and the specific standards of information they require. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the Proposed Development and its potential effects on the environment and provides initial feedback in the early stages of the EIA process.

2.7.2 Scoping Responses

Table 2-5 lists the responses received from the bodies to the scoping document circulated in August 2023 and again in November 2023. Copies of all scoping responses are included in Appendix 2-1 of this EIAR. If further responses are received, the comments of the consultees will be considered in the construction and operation of the Proposed Development in the event of a grant of planning permission. The recommendation of the consultees has informed the project design and scope of assessments undertaken and the contents of the EIAR.

Table 2-4: Scoping List and Responses

Ref	Consultee	Date of Response
1	An Taisce	No response.
2	Bat Conservation Ireland	No response.
3	BirdWatch Ireland	No response.
4	Butterfly Conservation Ireland	No response.
5	Commission for Regulation of Utilities, Water and Energy	No response.
6	Department of Agriculture, Food and the Marine	31/08/2023
7	Department of Defence	No response.
8	Department of Housing, Local Government and Heritage	23/08/2023
9	Department of Communications, Climate Action and the Environment	23/08/2023
10	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No response.
11	Department of Transport	21/09/2023
12	EirGrid	No response.
13	Environmental Protection Agency	No response.
14	Failte Ireland	25/08/2023
15	Geological Survey of Ireland	23/08/2023, 31/08/2023, 29/11/2023
16	Health Service Executive	25/09/2023
17	Inland Fisheries Ireland	No response.
18	Irish Aviation Authority	23/08/2023, 29/08/2023,29/11/2023

Ref	Consultee	Date of Response
19	Irish Peatland Conservation Council	No response.
20	Irish Raptor Study Group	No response.
21	Irish Red Grouse Association - Conservation Trust	No response.
22	Uisce Éireann	No response.
23	Irish Wildlife Trust	31/08/2023
24	Office of Public Works	No response.
25	Sustainable Energy Authority of Ireland	No response.
26	The Heritage Council	No response.
27	Transport Infrastructure Ireland	No response.
28	Waterways Ireland	23/08/2023 24/08/2023 30/11/2023
29	Wexford County Council (Env)	No response.
30	Wexford County Council (Heritage)	23/08/2023
31	Wexford County Council (Roads)	No response.

Table 2-6 sets out the detail of Telecommunication consultation responses received. The responses received were fully considered and issues raised where followed up through contact with the respondent where clarification was necessary and addressed throughout the EIAR.

Table 2-5:Telecommunications Scoping and Responses

Ref	Consultee	Date of Response
1	ComReg	13/04/2022
2	Eircom Ltd	06/04/2022
3	Imagine Networks Services Ltd	05/04/2022
4	Ivertec Ltd	05/04/2022
5	Eir	06/04/2022
6	Meteor Mobile Communications Ltd	06/04/2022
7	Ripple Communications Ltd	No response,
8	Three Ireland (Hutchison) Ltd	05/04/2022
9	Viatel Ireland Ltd	No response.
10	Virgin Media Ireland Ltd	05/04/2022
11	RTÉ Transmission Network Ltd	05/04/2022
12	RTÉ/Saorview	05/04/2022
13	Vodafone Ireland Ltd	05/04/2022
14	Enet	05/04/2022
15	BT Communications Ireland	05/04/2022
16	ESB Telecoms	24/04/2022
17	2rn (RTÉ Transmission Network) RTÉ/Saorview	05/04/2022
18	Tetra Ireland Communications Ltd	05/04/2022
19	Towercom	28/04/2022
20	Virgin Media	06/04/2022
21	BAI	05/04/2022
22	Ajisko Ltd	05/04/2022
23	Beat 102	20/04/2022

	Irish Defence Forces	No response.
	JFK Communications Ltd	No response.
	JS Whizzy Internet Ltd	No response.

Table 2-7 below provides a summary of the details received from the consultees. The table also identifies the relevant chapter where the points raised by each of the consultees are addressed.

Table 2-6: Consultee responses and relevant chapters

Consultee	Points raised by consultee	Addressed in Chapter
Fáilte Ireland	Provided copy of most recent Fáilte Ireland 2023 EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects	Chapter 5: Population and Human Health
Geological Survey of Ireland	Recommend the use of the GSI 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.	Chapter 8: Lands, Soils and Geology
Health Service Executive	Provided an Environmental Health Service Submission Report outlining key considerations in relation to potential impacts of the Proposed Development to be assessed in the EIAR,	Chapter 4: Description Chapter 5: Population and Human Health Chapter 8: Lands, Soils and Geology Chapter 9: Hydrology and Hydrogeology Chapter 10: Air and Climate Chapter 11: Noise and Vibration
2rn (RTE Transmission Network) RTÉ/Saorview	Requested a protocol signed between the developer and 2rn should the Proposed Development go ahead	Chapter 14: Material Assets
Tetra Ireland	Requested that the Proposed Development is reviewed by Eir.	Chapter 2: Background

2.8 Other Consultations

2.8.1 Community Engagement

Prior to the lodgement of this application, the applicant engaged with the surrounding community with regards to the Proposed Development. Community consultations comprised one newsletter drop,

between 25 May 2024 and 7 June 2024, to dwellings within a 2km radius of the wind farm advising of the forthcoming planning application to be made to Wexford County Council. The newsletters outlined the aim of the application for the Proposed Development and the next steps involved. The newsletter included contact details for the project team. Each respondent was personally engaged or offered engagement. A community report was prepared in line with the Guidelines set out below and is included in Appendix 2-2 of this EIAR.

The Wind Energy Development Guidelines (2006) (the Guidelines) state that:

> *"While it is not a mandatory requirement, it is strongly recommended that developers of a wind energy project should engage in active consultation and dialogue with the local community at an early stage in the planning process, ideally prior to submitting a planning application".*

This was further addressed in the Preferred Draft Approach to Wind Energy Development in Ireland (June 2017) which stated the following with respect to planning applications for wind farms:

> *"Planning applications must contain a Community Report prepared by the applicant which will specify how the final proposal reflects community consultation. The Community Report must also outline steps taken to ensure that the proposed development will be of enduring economic benefit to the communities concerned".*

The Draft Revised Wind Energy Guidelines (Department of Housing, Planning and Local Government, 2019) (the draft Guidelines) has retained this position stating the following:

> *"In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report".*

The Proposed Development will provide an enduring economic benefit to the communities surrounding the Proposed Development as outlined in Appendix 2-2 of the EIAR, through the community benefit package for residents and community groups, employment during the construction and operation of the Proposed Development and through the annual rates payable to the local authority.

2.8.2 Pre-Planning Meeting

2.8.2.1 Wexford County Council

The prospective applicant and members of the design team met with Wexford County Council in relation to the Proposed Development prior to the submission of this planning application. The pre-planning meeting took place on 22th August 2023 via MS Teams and included representatives from Wexford County Council, Castledockrell Wind Group Ltd and MKO. The team gave a PowerPoint presentation as an introduction to the site and development proposals.

Those invited and in attendance at the meeting were as follows:

- James Lavin – Wexford County Council
- Brendan Cooney (absent) – Wexford County Council
- Clarke Allen – Castledockrell Wind Group Ltd.
- Henry Chamney – Castledockrell Wind Group Ltd.
- John Willoughby – MKO
- Niamh McHugh – MKO

Matters discussed included:

- Site location and wind energy zoning classification
- Principle of development with regard to the national, regional and local policy context
- The permanent extension of lifetime of the onsite 110kV substation
- Noise and shadow flicker requirements
- Extension of operational life timeframe
- Impacts on biodiversity

Following the pre-planning meeting, the applicant engaged further with Brendan Cooney, a representative from the Environmental Section of Wexford County Council. Two meetings took place (17/06/2024 & 30/09/2024) to discuss the noise monitoring approach at the Proposed Development site. The advice and recommendations provided by Wexford County Council at the meetings has been considered and the noise monitoring approach has been amended in response.

2.9 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short-, medium-, and long-term, permanent, and temporary, positive and negative effects of the project (all of which are considered in the various chapters of this EIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIAR process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.9.1 Methodology for the cumulative Assessment of Projects

The EIA Directive includes a requirement to consider '*a cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.*' The methodology for the cumulative assessment has been informed by the relevant Guidance documents and by the nature and scale of the Proposed Development.

The potential cumulative impact of the Proposed Development and combined with the potential impact of other projects or plans has been carried out with the purpose of identifying what influence the Proposed Development will have on the surrounding environment when considered collectively with approved and existing projects, projects pending a decision from the planning authority, projects in the public domain such as those Strategic Infrastructure Development (SID) at pre-consultation with An Bord Pleanála, and land-uses in the vicinity of the Proposed Development site location.

The cumulative impact assessment of projects has three principle aims:

- To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Development.