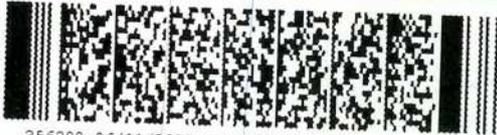




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256398-06/11/2025-EIAR Appendix 2.1 Community
Engagement Report



APPENDIX 2-1

COMMUNITY ENGAGEMENT REPORT

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Planning and
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Consultants

Environmental Impact Assessment Report

Curraglass Wind Farm, Co.
Cork

Community Engagement Report

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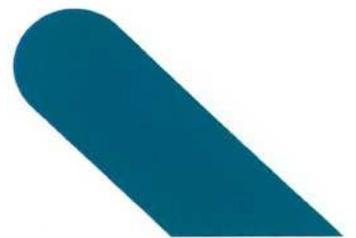
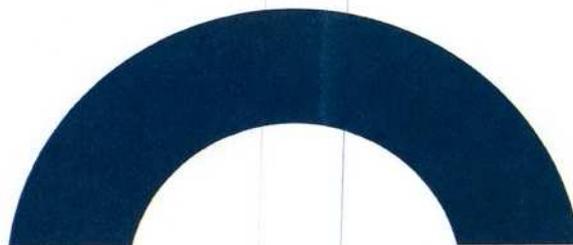
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DOCUMENT DETAILS

Client: **Wingleaf Limited**

Project Title: **Curraglass Wind Farm, Co. Cork**

Project Number: **240614**

Document Title: **Environmental Impact Assessment Report**

Document File Name: **Community Engagement Report**

Prepared By: **MKO**
Tuam Road
Galway
Ireland
H91 VW84



Planning and
Environmental
Consultants

Rev	Status	Date	Author(s)	Approved By
01	Draft	21/05/2025	JB	SC
02	Draft	03/06/2025	JB	SC
03	Final	19/08/2025	JB	SC

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1. INTRODUCTION

1.1 Introduction

This report has been prepared to document the consultation carried out with the local community in respect of the proposed Curraglass Wind Farm, Co. Cork. Wingleaf Ltd, is an associate company of Enerco Energy, which has been created exclusively for the Proposed Development. Enerco Energy Ltd. has led the community consultation process in relation to the Proposed Development with local residents and interested parties in the wider community. The objective of the consultations was to ensure that the views and concerns of all interested parties were considered as part of the Proposed Development design and Environmental Impact Assessment (EIA) process.

The Proposed Development has the potential to have significant benefits for the local economy, by means of job creation, landowner payments and commercial rate payments. An important part of any renewable energy development, which the Applicant has been at the forefront of developing, is its Community Benefit Package. The concept of directing benefits from wind farms to the local community is promoted by the National Economic and Social Council (NESc) and the Wind Energy Ireland (WEI) among others. While it may be simpler and easier to put a total fund aside for a wider community area, Wingleaf Ltd. is endeavouring to develop new ways to direct increased gain towards the local community with particular focus on those living closest to the Proposed Development.

The Guidelines (DoEHLG, 2006) 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 Ireland¹ (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 Guidelines (DoHPLG, 2019) 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”.

This report outlines the consultation and community engagement initiatives undertaken by the Applicant prior to the submission of the planning application. It also outlines the main issues identified during this process, how the final proposal reflects community consultation and the steps taken to ensure that the Proposed Development will be of enduring economic benefit to the communities concerned.

¹ The Department of Communications, Climate Action and Environment and Department of Housing, Planning, Community and Local Government, Information Note Review of the Wind Energy Development Guidelines 2006 “Preferred Draft Approach”, 2017, p.8

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2. CONSULTATION WITH THE LOCAL COMMUNITY

2.1 Introduction

Engagement with the local community forms a key part of the development process for renewable energy projects. The purpose of this appendix is to outline the consultation measures undertaken in relation to the Proposed Development and to demonstrate how community input has been encouraged and facilitated throughout the planning process.

It is noted that wind energy has been part of the local landscape for a considerable period of time, with the Kealkill Wind Farm already present in the area. As such, the local community is familiar with wind energy infrastructure and its operation. This longstanding presence has contributed to a degree of local awareness and understanding of wind energy projects at the Site, which has informed the approach to community consultation undertaken for this Proposed Development.

2.2 Notification of the Local Community

To inform local residents about the 2020 Application, a project Community Liaison Officer (CLO) was appointed, and an introductory information pack was delivered via door-door consultation to all householders within a c.2km radius of the area of the site, between 8th January 2020 and 7th April 2020. The information distributed to each household consisted of:

- Dedicated contact details (name, phone and email) for the community liaison officer (CLO) in relation to the project.
- A company brochure, which provided an overview on Enerco Energy and some general information about wind energy.
- An information leaflet detailing the biodiversity within the study area.

The community consultation effort was led by Enerco Energy Ltd on behalf of Wingleaf Ltd. which is a project specific company.

2.2.1 Community Interactions

Following the initial notification of the proposal to the local community, the CLO liaised with interested parties in helping them to understand the proposal and respond to any queries or concerns raised. As more project information became available, further consultations were organised, with the CLO attending in-person meetings with individuals to answer queries relating to the Proposed Development.

The following paragraphs provide an outline of the consultation effort, with further detail provided in the following sections below:

In January 2020, the first round of public consultation for the 2020 Application was carried out, via door-to-door visits by the CLO. A brochure with information about Enerco Energy and general information about wind energy was handed out on this initial round of consultation. Two additional visits were planned, one in February and one in April, however only the February visit was carried out due to the limiting regulations and restrictions of COVID-19. A biodiversity brochure outlining the relevant flora and fauna was handed out on this second round of consultation. Furthermore, a Public Information Exhibition (PIE) could not be held before the 2020 Application was submitted due to COVID-19 restrictions.

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A dedicated project website (www.curraglassinfo.com) was launched in June 2020. The public was made aware of the website, and all previous publicly shared information was uploaded and made available there. All subsequent further information and project updates have been shared on the project website.

The community was provided with a project update in February 2022, following An Bord Pleanála's, now referred to as An Coimisiún Pleanála (ACP), decision to grant permission in January 2022. This update came in the form of a letter that was handed out by the CLO to all initial houses, as well as additional houses picked up from previous visits and discussion with the community.

In December 2024, another letter was delivered door-to-door, notifying the community of the recent decision by ACP to refuse permission following judicial review and to introduce the revised proposal that Wingleaf Ltd. intended to apply for.

In February 2025, correspondence was circulated, notifying the community about the dates and times of the first Public Information Exhibition (PIE) to be held February 26th, in Béal Átha'n Ghaorthaidh GAA Clubhouse in Ballingeary.

Throughout the lengthy consultation period the CLO has continued to liaise with any interested parties and answer any questions as promptly as possible.

2.2.1.1 January 2020

Initial door-to-door visits were made by the appointed CLO to houses 1 to 47 identified on the map, as well as Cappabue National School. These had been selected for the public consultation process due to their proximity to the Site, within an approximate 2km zone. Introductions were made and a brief outline of the proposal was given. Residents were each shown the location of their house on the map in relation to the proposed renewable energy development area. An Enerco Energy (the driver behind Wingleaf Ltd) leaflet was left with them, outlining information on a range of topics, including wind energy in Ireland, the development process and community involvement, as well as contact details for the CLO.

This was an opportunity to further validate the sensitive receptors that had previously been identified, with a few new ones added and others confirmed as derelict properties.

In the event that nobody was home through-out this period, a leaflet was left in the post box and contact details were sought from nearby neighbours in an attempt to ensure that contact was made.

A number of Irish and international phone calls were also made to the owners of houses that were identified as holiday homes or seasonal dwellings. In this instance, the project was discussed over the phone and a postal address was requested, to enable the aforementioned leaflet to be sent.

Meetings were arranged for dates and times that suited those residents who were unavailable at the time of calling, or who wished for other family members to be present for the discussion.

Of the 47 houses, direct contact was made with 42. The remaining five were lived in seasonally and phone numbers could not be sourced from neighbours. Information leaflets were left at these houses with contact details.

2.2.1.2 February 2020

A second round of door-to-door visits was made. This was predominantly to answer any questions that had arisen following the previous round of visits, as residents would have had a chance to discuss the proposal with family members and neighbours. Additional information was provided in the form of a biodiversity leaflet, produced by environmental consultants MKO, which contained local ecology information resulting from the surveys that were ongoing at the time.

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Where residents were not home during this period, a leaflet was left in their post box, and several attempts were made to reach them by phone where possible. Contact was made with 32 of the 47 houses, while a copy of the biodiversity leaflet with contact details was left at the remainder.

Overall, the general reception was positive. The Public were satisfied with the continued consultation and with the general flow of information. General queries related to turbine heights, noise levels, overhead lines and the potential impacts of construction traffic and were all satisfactorily addressed as they arose. As turbine height had yet to be finalised, residents were informed that this detail would be confirmed at a later stage.

2.2.1.3 April 2020

Due to the advancing COVID-19 pandemic, the planned door-to-door visit was cancelled, as it was not reasonable to be calling to houses during this period. In place of this, phone calls were made to residents to explain the situation, outline further developments in the project and answer any queries they may have. Details of the number of turbines and their proposed maximum tip height were given.

Contact was made with 31 of the 47 houses. Of those who were contacted, they were encouraged to communicate the latest information to their neighbours. Of the remainder, 5 had been uncontactable from the beginning, another 5 had not provided contact numbers, while the remainder did not answer after several attempts were made at varying times over the duration of the consultation period.

The general feedback from those who were spoken to over the phone was that the correct decision had been made in avoiding door-to-door contact. Again, people were happy with the continued consultation that communication lines remained open for any queries they might have. Some residents questioned the tip height, as they felt the turbines were quite tall. It was explained that this was a maximum proposed tip height and that the final height would be decided upon by the availability of turbine models if/when that stage of the project was reached. There were multiple queries relating to the community benefit fund, predominantly how best to go about applying for it. It was reiterated that if suggestions were emailed or posted in, they would be filed for consideration, and it would be best if members of the community could reach some level of consensus on this.

Due to the COVID-19 restrictions, it was decided that it would not be appropriate to hold a public meeting to display the details of the project to the local community. The dedicated project website was used to display the relevant information to the local community and those closest to the Proposed Development were contacted to inform them that the information was available, www.curraglassinfo.com.

2.2.1.4 March 2022

The information pack issued to the usual mailing list in February 2022 provided an update on the project status. This letter was sent following An Bord Pleanála's decision to grant permission after the refusal decision by Cork County Council was appealed. It included a letter outlining the decision by ACP, discussing the current Renewable Energy Support Scheme (RESS) and the Community Benefit Fund and asking for feedback from the community. It also included a map with the houses, turbine positions and 1k and 2km setbacks from the turbines marked to help provide the community context for the distance the turbines were from the houses.

2.2.1.5 December 2024

An update letter was hand delivered to the community noting the ACP refusal and introducing the revised proposal to the community. The letter outlined developments since the granted permission that was detailed in the previous letter and what steps had occurred leading to the decision to ultimately be refused. The letter also introduced the Proposed Development (detailing a revised 3 turbine proposal) being prepared by MKO.

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Contact was made with 29 of 87 dwellings and 1 national school within 3km of the 2020 Application (this extends to include the proposed turbine component turning area). This approach is considered to be appropriate in the context of the limited works proposed at the turbine component turning area. The update letter was left in the post box or a similar location for the remainder of the dwellings. This was another opportunity to validate the sensitive receptors that had previously been identified, verify any new ones added since the 2020 Application and confirm others that were marked as derelict properties.

2.2.1.6 February 2025

In February 2025, correspondence was circulated, notifying the community about the dates and times of the Public Information Exhibition to be held February 26th, in Béal Átha'n Ghaorthaidh GAA Clubhouse in Ballingeary.

Contact was made with 27 of the 87 dwellings and 1 national school when hand delivering and for the remainder of the dwellings, the letter was left in the post box or a similar location. Those who were met were encouraged to attend the upcoming PIE, and if they could not attend to reach out to the CLO with any queries they had on the Proposed Development.

2.2.1.7 Public Information Exhibition

PIE Advertisement

On February 12th, 2025, a letter was circulated to the mailing list notifying them of the Public Information Exhibition to be held February 26th, in Béal Átha'n Ghaorthaidh GAA Clubhouse in Ballingeary. An advert was also placed in the Southern Star on February 13th to notify the wider community of the upcoming PIE.

PIE Details

Béal Átha'n Ghaorthaidh GAA Clubhouse, Ballingeary (26/02/2025) (approx. 50 attendees)

The Public Information Exhibition was attended primarily by people who live in the locality of the Proposed Development. The exhibitions comprised several graphic and information boards positioned for the public to read. Members of the project team including the prospective Applicant were in attendance to answer any queries and discuss the project details. The information presented included:

- > Detail on the wind farm and grid connection sites
- > Consultation undertaken
- > Application process Site constraints
- > Development design
- > The chapters to be included in the Environmental Impact Assessment Report
- > Environmental benefits
- > Community benefits
- > Next steps and how to get in touch
- > Selection of photomontages

Members of the public were invited to submit comment, concerns, and opinions regarding the Proposed Development through a feedback form at the event. The project website address, www.curraglassinfo.com, and the contact details of CLO were on display for the attendees.

All information that was displayed at the Public Information Exhibition was made publicly available for interested parties to view in their own time, and the website includes a contact page which facilitates any feedback or queries from the community.

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PIE Feedback

The main queries raised during the Public Information Exhibitions, were:

1. Visual Impact;
2. Community Gain Scheme;
3. Number of turbines;
4. Tip Height;
5. Noise and Vibration;
6. Impact on Biodiversity;
7. Tourism Impacts;
8. Hydrological Impacts;
9. Turbine Foundations;
10. Shadow flicker;
11. Planning process.

Following the Public Information Exhibition, the CLO followed up with any queries raised at the events. Feedback received at and since the public information evenings has been noted by the CLO and relayed to the design team. This feedback has continued to inform all refinements to the project design, and all concerns have been fully addressed in the EIAR and NIS that accompany this planning application.

Dedicated Contact Details

Since the 2020 Application was first introduced to the community in February 2020, and throughout when the Proposed Development was introduced in December 2024, dedicated project contact details for the Proposed Development have been provided to the community, including a dedicated phone number and email address. To date, these channels have facilitated several enquiries about the Proposed Development.

Project Website

In June 2020, a dedicated project website was launched, www.curraglassinfo.com. The website is an additional communication channel to keep members of the public informed about the Proposed Development. All information that was made available to the community has been uploaded to the website throughout the consultation period.

Following subsequent site layout amendments, the information hosted on the website was updated in line with the various rounds of consultation. This allowed members of the public to access the latest information at all times. The website will be updated as any new information becomes available.

Community Liaison Officer

In January 2020, a dedicated Community Liaison Officer (CLO) was appointed for the 2020 Application to facilitate on the ground engagement with the local community. As part of this consultation, the CLO introduced the project to the local community in February 2020, as outlined in detail above. The CLO remained available following the introduction of the Proposed Development in December 2024. Throughout the community consultation process the CLO has been available to liaise with all interested parties in the community to address any concerns raised. To date, having a single point of contact for the community has proved successful in addressing any concerns raised. The CLO will continue to be available to address any queries or concerns that may be raised by the community in relation to the Proposed Development.

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3. **ENDURING ECONOMIC BENEFIT**

3.1 **Economic Benefits – Community Benefit Fund**

Throughout the public consultation process, residents were informed about the availability of a community benefit fund, in the event of a grant of planning for the Proposed Development. Examples were given of how this fund could be utilised to help provide a loose framework of what it can contribute to the community. It was highlighted that this fund could be used, for example, as funding for a range of youth, sport and community facilities, schools, educational and training initiatives, and wider amenity, heritage, and environmental projects.

Initial local suggestions for use of the fund included grants for the local GAA clubs, Cappabue National School, water-mains connections for residents who relied on river water, local enterprise schemes, riparian planting of native species, energy retro-fitting of houses (PV, Heat Pumps, Triple Glazing etc.) and contributions to electrical bills.

3.1.1 **Short Term Economic Benefits**

During the construction phase, it is estimated that at peak construction approximately 40 jobs will be created. This in turn will have a knock-on effect of the local economy through the supply of services to the workforce. While at a regional level additional employment will be created in the region through the supply of services and materials (such as stone and concrete) to the Proposed Development.

Additionally, the payment of a development contribution to Cork County Council in respect of public infrastructure and facilities will potentially provide benefits to the local community through schemes such as the refurbishment, upgrading or replacement of roads, car parks and car parking places; sewers and wastewater facilities, drains or water mains; provision of open spaces/parks, community facilities, amenities and landscaping works etc.

3.1.2 **Long Term Economic Benefits**

The Proposed Development will provide many long-term economic benefits to the communities in the surrounding areas, as outlined in the following sections.

3.1.2.1 **Employment**

It is estimated that approximately 40 jobs will be created during the construction, operational and maintenance phases of the Proposed Development.

3.1.2.2 **Rates**

Annual rates paid by the Proposed Development to Cork County Council will potentially support the provision of local services.

3.1.2.3 **Community Benefit Fund**

Throughout the community engagement on the Proposed Development, the Renewable Energy Support Scheme (RESS) 2 guidelines have been used to demonstrate what benefits the community would receive should the project be developed under RESS. The RESS 2 T&C's have since been updated in RESS 5 and will likely change again before the Proposed Development is built. As such, the fund will be adjusted accordingly depending on what RESS iteration is relevant when the Proposed Development becoming operational.

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Based on RESS 2 guidelines it is expected that for each megawatt hour (MWh) of electricity produced by the wind farm, the project will contribute €2 into a community fund for the first 15 years of operation of the Proposed Development.

Should the Proposed Development be developed under the RESS 2 T&C's, as a 14.4MW development it would attract a community contribution in the region of almost €88,000/year for the local community (estimated based on an average energy yield). The value of this fund would be directly proportional to the electricity generated by the wind farm. Under the RESS 2 T&Cs, the following is the recommended breakdown of the fund:

- **Direct payments** – to those living closest to the Proposed Wind Farm. A minimum €1,000 payment per annum for houses within 1km of the Proposed Development.
- **Energy Efficiency** – A minimum of 40% per year would be available for the development of energy initiatives to benefit people living in the local area.
- **Administration costs** – a maximum of 10% per year will be made available for the administration and governance costs of the fund.
- **Support for local groups** – The remaining balance of this community benefit fund would be available for local groups, clubs and not for profit organisations that provide services in the local area. This would include services for the elderly, local community buildings, and the development of sporting facilities such as all-weather playing pitches etc.

The Community Benefit Fund belongs to the local community. The premise of the fund is that it should be used to bring about, significant, positive change in the local area. To make this happen, the first task will be to form a benefit fund development working group that clearly represents both the close neighbours to the project as well as nearby communities. The group will then work on designing the governance and structure of a community entity that would administer the Community Benefit Fund.

Should the Proposed Development not be developed under RESS, the Applicant is committing that for each megawatt hour (MWh) of electricity produced by the wind farm, the project will contribute €1 into a community fund for the entire operational life of the Proposed Development. This would equate to an estimated annual fund of approximately €44,000 (using the same formula as above), which across the 35-year operational lifespan would result in funding in the order of €1.5 million to the local community which is a substantial contribution.

The number and size of grant allocations will be decided by a Community Fund liaison committee with various groups and projects benefiting to varying degrees depending on their funding requirement.

3.1.2.3.1 **Community Gain Examples**

➤ **Support for local groups**

- Astro turf pitches;
- Walking/running tracks;
- Floodlighting;
- Upgrade of clubhouse facilities;
- Improved accessibility of local community facilities
- Provision of ramps
- Disabled parking spaces;

- Installation of heat pumps
- Retrofitting of insulation
- Fitting of triple-glazed windows
- Retrofitting of boilers
- Fitting of advanced ventilation

Energy Efficiency

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- Fitting of Solar PV panels
- Monetary contribution towards energy bills

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4. CONCLUSION

Active engagement and consultation with the local community has taken place from an early stage during the pre-application phase of the previous proposal and the current Proposed Development. The consultation process has been an extremely valuable exercise and has provided a detailed, and enhanced understanding of the key issues and concerns of the local community, which have ultimately shaped the final project proposal. There is currently on-going consultation with the local community, and it is the intention of the applicant to continue with the consultation for the entire lifespan of the Proposed Development.

The development of the proposed Curraglass Wind Farm will provide an enduring economic benefit to the communities surrounding the Proposed Development as outlined above, through the potential 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.

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NATIONAL ENVIRONMENTAL HEALTH SERVICE
Health Service Executive South West
Elmwood House
Lurriga
Skibbereen
Co. Cork P81 FC83
Tel:028-51456

Natasha Morley,
MKO,
Tuam Road,
Galway,
H91 VW84
info@mkoireland.ie or nmorley@mkoireland.ie

Date: 19th March 2025
Name: Natasha Morley, MKO, Tuam Road, Galway, H91 VW84
Consultant's reference: Project Number 240614
Re: EIA Scoping
Proposed development: Derreendonee and Curraglass, Co. Cork
Applicant: Wingleaf Limited
EHIS Reference: 4637

Dear Ms Morley,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 13th February 2025.

- HSE South Emergency Management – David O'Sullivan
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O' Moore/ Ina Kelly
- REO South West – Andy Phillips

If you have any queries regarding this report please contact Mr. Adrian O'Sullivan, PEHO, West Cork (adrian.osullivan@hse.ie) in the first instance.

Yours sincerely

Adrian O'Sullivan
Principal Environmental Health Officer

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HSE EIA Scoping

National Environmental Health Service Submission Report

Date: 19th March 2025

Our reference: EHIS 4637

Report to: Natasha Morley, MKO, Tuam Road, Galway, H91 VW84

Type of Consultation: EIA Scoping

Proposed development: Renewable energy (3 no. turbine windfarm) and all associated infrastructure and works.

Location: Derreendonee and Curraglass, Co. Cork

Applicant: Wingleaf Limited

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Proposed Development:

Wingleaf Limited intends to apply to Cork County Council for planning permission for a proposed wind farm development. The proposed development will "comprise approx. 3 no. wind turbines, existing access roads and entrance(s), borrow pits and spoil management areas, internal electrical cabling, temporary construction compounds and a permanent meteorological mast. All wind farm cabling will be laid underground." (taken from cover email)

The site is located at Curraglass and surrounding townlands, located approx. 5.6km northeast of Kealkill, 5.5km southwest of the village of Ballingearry, and 16km northeast of Bantry. The proposed site covers an area of approx. 267 hectares in total that is described in the scoping document as consisting of mixed forestry and peat bogs.

It is noted that the site previously operated as a renewable energy development from 2005 to 2018 with 10 no. turbines when decommissioned in June 2018. A planning history is referenced in the scoping document including refusal for a 7 no. turbine windfarm under Planning Reference 20/00350.

It is further noted that the proposed development proposes to utilise the existing windfarm infrastructure, including the existing on-site substation and existing access roads.

No data was found to indicate the anticipated period of the construction phase, the operational phase or decommissioning phase of the proposed development.

General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in Environmental Impact Assessment Reports (2022), EPA.
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanala_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

<http://www.epa.ie/pubs/consultation/reviewofdraftteisguidelinesadvicenotes>

Climate Action Plan 2024 CAP 2024 Govt. of Ireland, May 2024

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Circular Economy and Miscellaneous Provisions Act 2022

Generally, the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

- a) Description of the receiving environment;
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;
- d) Proposed mitigation measures;
- e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the National Environmental Health Service (NEHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and well-being are considered in a proportionate manner when considering the EIA including climate change.

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed. For example the potential for health gain should also be assessed, particularly in the context of climate action.

The HSE will consider the final EIAR accompanying the Planning application and will make comments to Cork County Council on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted, the cover letter dated 13th February 2025 and the Environmental Impact Assessment Scoping Document.

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

- Public Consultation
- Population and Human Health including Opportunity for Health Gain
- Climate Change
- Siting and location of turbines
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Geological Impacts
- Ancillary facilities
- Cumulative impacts

Some comment on selected criteria for inclusion are provided below.

Public/Community Consultation

The scoping document references Community Consultation and highlights that a Community Liaison Officer is available as a point of contact for the proposed development and will remain in place throughout the entire project timeline.

The full EIAR should demonstrate that the public have been consulted about the proposed development and that the efforts to consult the public are inclusive, to ensure participation, from all sections of society, potentially affected by the proposed development. In practical terms this should include using a range of communication methods (hard and digital methods) to ensure all sections of the community participate in the process at each stage, construction, operations and decommissioning.

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 EIAR.

Strategic Planning Context

Section 3 of the Scoping Report details the strategic planning context at European, National and more Local Level. A number of other documents could be included in the full EIAR, most notably the National Adaptation Framework 2024 and the more local Cork County Council Climate Action Plan 2024 – 2029.

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Population and Human Health including Opportunity for Health Gain

The National Environmental Health Service (NEHS) recommends that potential impacts on human health are assessed in each of the three phases of the proposed development, construction, operations and decommissioning.

The EIAR should further assess the potential health gains the proposed development offers. For example does the development intend to create recreational space for the local population providing health and well-being benefits? Will the development enable locals and staff to engage in active travel thereby impacting positively on cardio vascular health?

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines.

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The NEHS expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR.

Details of the foundations for the wind turbine including depth, quantity and material to be used should be included in the EIAR.

Specific to Decommissioning

The EIAR should detail the eventual fate of the wind turbines and associated material i.e. will the material be recycled or how will it be disposed of in the context of a circular economy.

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.

Climate Change

“Climate Change poses the greatest threat to global health this century” (World Health Organisation) and therefore should be considered in the context of Population and Human Health.

The EIAR should clearly illustrate how the development contributes to obligations under the Climate Action and Low Carbon Development Act 2015 and amendment of 2021 and the most recent Climate Action Plan 2024. It should also illustrate a link to National Planning Objective 54 under Chapter 9 – Realising our Sustainable Future within the National Planning Framework (Project Ireland 2040).

Under Mitigation of Green House Gas emissions the NEHS recommends that the EIAR assess, in the context of carbon budgets, the quantity of GHGs from the proposed development at every phase, construction, operations and decommissioning. The construction phase is likely to generate the most emissions and the EIAR should demonstrate how the construction phase will aim to minimise green-house gas emissions. Minimisation of green-house gas emissions should extend to ‘green procurement’ and embodied carbon.

The outline on Climate in the scoping report makes no reference to Adaptation to Climate Change or in other words the vulnerability of the proposed development to the effects of climate change. As referenced elsewhere a Flood Risk Assessment may form part of a wider Climate Change Risk Assessment (CCRA) but other potential hazards such as windstorms and dry spells (which may include the risk of forest fires) for example may also pose a risk. Risks extend beyond Severe Weather Events and may include other “slow-onset” risks linked to vector borne illnesses for example (tick bore and mosquito borne for example).

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It is suggested to utilise the Sendai Framework for Disaster Risk Reduction 2015 – 2030 in terms of assessing the risks to the proposed development and how to build resilience not just from the effects of climate change but more broadly also. As referenced elsewhere this section should also utilise the National Adaptation Framework 2024, Planning for a Climate Resilient Ireland.

This may be linked to the section of the EIAR that will address Major Accidents and Natural Disasters.

Noise & Vibration

The potential impacts for noise and vibration from the proposed 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 back ground levels.

In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed windfarm development must be undertaken which details the change in the noise environment resulting from the proposed development. This should include changes in the noise environment for day, evening and night time periods.

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/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

Shadow Flicker

A specific section on this in the scoping document was not found.

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

Reference to air quality in the scoping report fails in a number of areas and will require substantial improvement in the EIAR.

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The EIAR should identify the air pollutants of public health concern such as particulate matter and nitrous oxides for example in each of the three phases of the proposed development. The construction phase in particular is likely to generate air quality issues including the generation of dust and potential impact on sensitive receptors close to the site and during trackout.

A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust mitigation measures.

The topic of carbon emissions may be better suited to assessment under the Climate Chapter.

Reference literature missing under the Air Quality section of the Scoping Report include the WHO Air Quality Guidelines 2021 which offer quantitative health based recommendations on air quality. Others include the Clean Air Strategy for Ireland 2023 and the TA Luft Air Quality Standard specific to dust.

Water - Surface and Ground Water Quality

The proposed 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 National Environmental Health Service (NEHS) 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 a result of the construction of the underground cables should be identified and addressed in the EIAR.

Reference is made in the Scoping Report to the undertaking of a Flood Risk Assessment under this heading. As described in others parts of this submission Flood Risk Assessment should form a part of a wider Climate Change Risk Assessment. The Flood Risk Assessment should utilise historical data as well as predictive modelling up to and maybe beyond the intended operational lifespan of the proposed project.

Geotechnical and Peat Stability Assessment

A specific section in the scoping document on this issue was not found. In the context of a site described as containing peat bogs an assessment is required in this area.

A detailed assessment of the current ground stability of the site for the proposed windfarm development and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion.

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Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information.

Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on 13th November 2020 which may have been linked to construction activity at Meenbog Wind Farm. Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels.

The NEHS recommends that a detailed Peat Stability/Geotechnical Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf>

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Ancillary Facilities

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of waste and wastewater and the provision of a potable water supply to the site canteen.

Cumulative Impacts

All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

The impact on sensitive receptors of the proposed development combined with any other wind farm/renewable energy developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed windfarm development.

Niall Roche

Niall Roche

Oifigeach Sláinte Comhshaoil - Environmental Health Officer

Timpeallacht/Athrú Aeráide, Aonad Tacaíochta Líonra - Environment/Climate Change, Network Support Unit (NSU)

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WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)

GIVE THE FOLLOWING INFORMATION

This is: _____ Eircode _____
(Name, Telephone Number and Eircode Address of site)

An incident has occurred at this site - standby for ETHANE message

E	
	Exact location of the incident
T	
	Type of incident, e.g.; fire, explosion, gas leak, etc
H	
	Hazards – current and potential
A	
	Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP)
N	
	Number of casualties and their condition – specify adult / children if known
E	
	The emergency services present and required

N.B. If you require another emergency service stay on the line and repeat the steps again

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**Fáilte
Ireland**

**Turasóireacht Náisiúnta
An tÚdara Eorbartha**
National Tourism
Development Authority

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EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



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An tÚdaráis Náisiúnta Forbartha Turasoireachta
Áras Fáilte, 88-95 Sráid Amiens
Baile Átha Cliath 1
D01 WR86
Éire

National Tourism Development Authority
Áras Fáilte, 88 - 95 Amiens Street
Dublin 1
D01 WR86
Ireland

Phone 1890 525 525
or +353 1 884 7700
Email info@failteireland.ie
www.failteireland.ie

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1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed **9.7 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Ireland's role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

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Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to provide 'An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects' to 'a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

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- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breath and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

Screening

Through EIA Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

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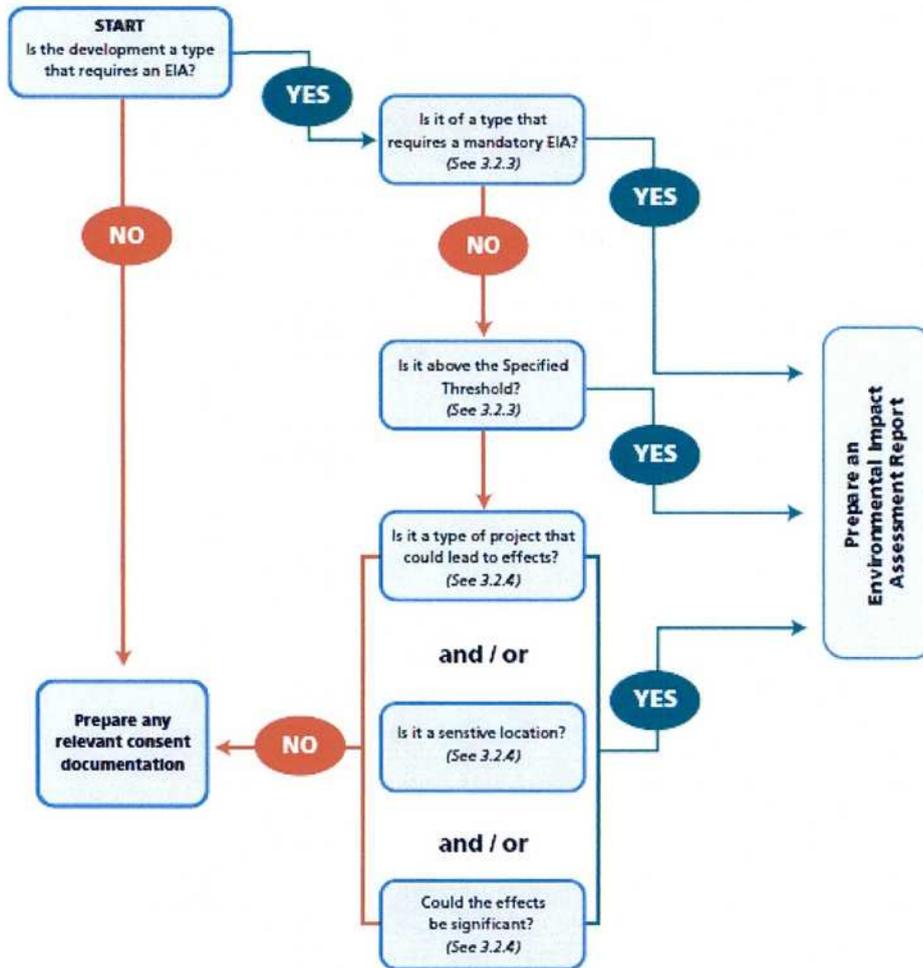
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Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised above in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there may still be a requirement for an EIAR for that development (subject to EIA Screening assessment).

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EIAR Scoping

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

4. Assessing Tourism

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is "*Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities*". This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

Projects which involve a tourism element

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious – walking/cycling/forest trails, greenways, blueways, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element can have potential for particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

Projects which may have an impact upon tourism

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture

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- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by 'competent experts'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (e.g. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

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- 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.

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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.

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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.

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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.

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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.



**Fáilte
Ireland**

**Turasóireacht Náisiúnta
An tÚdara Eorbartha**
National Tourism
Development Authority

MKO Ireland.
Tuam Road,
Galway,
H91 VW84

03rd March 2025

By Email: nmorley@@mkoireland.ie

Re: Submission by Fáilte Ireland to the EIA Scoping Document for a Proposed Renewable Energy Development, in the townlands of Derreendonee and Curraglass, Co. Cork.

Dear Natasha,

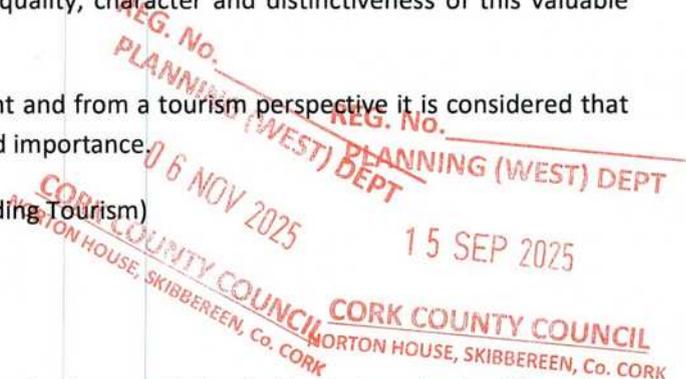
This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the invitation to make a submission in relation to EIA Scoping Document for a Proposed Renewable Energy Development.

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected.

We have reviewed the EIA Scoping Document and from a tourism perspective it is considered that the following areas are of most relevance and importance.

- Population and Human Health (including Tourism)
- Landscape and Visual
- Cultural Heritage

The site of the proposed Curraglass Wind Farm development is located in the townlands of Cappaboy Beg, Derreendonee and Curraglass and is situated in West Cork. The proposed development would be situated in a mountainous and scenic area of West Cork within the Wild Atlantic Way Region. While the immediate catchment of the WAW is the coastal zone, the route itself acts as a calling card to gain the attention of the visitor and acts as a device to entice people to the west of Ireland. Once there, visitors are encouraged to further explore and engage with tourism experiences and communities in a wider geographical area. In this instance, Gougane Barra offers such experiences, the Gougane Barra National Forest Park, lake, St. Finbarr's Oratory, accommodation offerings and





the numerous walking and cycling the area offers such experiences with walking trails including a section of the long distance Beara Breffni Way – which has been identified by Fáilte Ireland as a signature visitor experience with the potential to be an internationally motivating activity experience of scale for holidaymakers looking to engage with Ireland’s cultural landscape on quiet and off-road trails.

The impact of the development needs to be fully considered because of the important tourism amenities in the area. Key tourism amenities like walking/hiking trails and tourism attractions should be considered and be included in the EIAR having regard to the proximity of these to the proposed development.

Tourism and the Environment

There are two interactions between tourism and the environment - impacts caused by tourism projects and impacts affecting tourism. Regarding electricity transmission planning and development, it is anticipated that the majority of the interactions would occur as impacts affecting tourism.

Fáilte Ireland carries out annual visitor attitude surveys. Fáilte Ireland’s Overseas Holidaymakers’ Attitudes to Ireland identifies the following, as the reasons tourists visit and enjoy Ireland:

- Interesting history and culture (84%)
- Plenty to see and do (89%)
- **Beautiful scenery (91%)**
- **Natural, unspoilt environment (82%)**
- **Natural attractions (84%)**

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It is noteworthy that beautiful scenery and natural attractions score highly as reasons for visiting Ireland. These factors are environmental and relate particularly to our landscape, coastal and rural areas.

Beautiful scenery – Particular attention needs to be given to effects on views from existing purpose-built tourism facilities, as well as views from touring routes, walking trails, scenic viewing points, greenways etc. have the potential to be particularly affected by infrastructure related developments which are located within viewing distance from the coast. Indeed, scale and sighting of individual and cumulative developments must also be taken into consideration.

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Natural attractions – It is important to avoid any effects that may negatively impact local attractions and experiences.

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects (Separately attached)

The purpose of these guidelines is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines. A copy of these has been attached to this submission.

Additional Comments

Key tourism and amenity resources

A list of attractions, activities and tourism experiences can be found at

[Plan Your Trip to Beautiful County Cork with Discover Ireland](#)

[Walking | Sport Ireland](#)

[Things To Do | Pure Cork](#)

Additional Studies & Guidance that may be useful as part of the EIAR Scoping process

West Cork Coast Destination and Experience Development Plan

[Fáilte Ireland - West Cork Coast | | Visitor Experience Development Plan | The Wild Atlantic Way](#)

Conclusion

Fáilte Ireland recognises the importance of developing the State's renewable energy sector and transition to a low carbon energy. It is the policy of Fáilte Ireland to support the sustainable development of electricity generation by sustainable and renewable sources and support its contribution towards a sustainable energy supply at appropriate locations and in accordance with proper planning and sustainable development.

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We trust that the above will provide additional insights which will ensure that tourism and the potential impacts on tourism are adequately considered in the future steps/phases of the project. We thank you for your time and consideration of our submission. Please do not hesitate to contact us if you have any further queries to discuss our submission and/ or provide further information.

Yours sincerely,

Shane Dineen

Manager of Environment and Planning, Fáilte Ireland

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