

CONSULTANTS IN ENGINEERING, ENVIRONMENTAL SCIENCE & PLANNING

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED COOM GREEN ENERGY PARK, COUNTY CORK

VOLUME 2 – MAIN EIAR

CHAPTER 5 – EIA SCOPING CONSULTATION AND KEY ISSUES

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5. INTRODUCTION

5.1 Introduction

Consultation is an important part of the Environmental Impact Assessment (EIA) process. This chapter describes the consultation process and EIAR scoping that was undertaken in order to identify key effects from the proposed Coom Green Energy Park (CGEP) project to be included in the EIAR. The consultation process carried out for the project has been a lengthy, detailed and thorough process. A number of points and submissions were raised as part of the consultation process which have informed the project design and this EIAR.

This chapter presents the key points that arose through the consultation process and how these points were assessed in the EIAR. The consultation process, scoping and pre-application consultation undertaken in respect of the proposed development are set out in this chapter.

Through the consultation process, specific regard has been taken to the *Code of Practice for Wind Energy Development in Ireland – Guidelines for Community Engagement* published on the 21st December 2016 by the Department of Communications, Climate Action and the Environment. *"This Code of Good Practice is intended to ensure that wind energy development in Ireland is undertaken in observance with the best industry practices, and with the full engagement of communities around the country"*. Coom Green Energy Park Limited had regard throughout the pre-planning process of the practical steps that renewable energy promoters should comply with, in engaging with communities as set out in this Guidance.

Initial design of the project provided 39 no. turbines, however, through site investigation and analysis this number was reduced to 27 no. turbines and published as Design Iteration 1. Following consultation, the layout of the wind farm was reduced from 27 turbines to 22 turbines. This has resulted in a minimum setback distance of 750m for all dwellings and reducing potential impacts of noise on local residents. The consultation process also resulted in the battery storage provision reducing from 2 locations to 1 location. The overall area of the wind farm has been scaled down from the original design, reducing potential impacts on habitats and species in the area. The applicant has also committed to zero shadow flicker at residences, so far as possible, where turbines will be programmed to cease operating when there is potential for shadow flicker.

5.2 Scoping

The purpose of the EIA scoping process is to identify the key points and issues which are likely to be important during the environmental impact assessment (EIA) and to eliminate those that are not. The scoping process identifies sources or causes of potential environmental effects, the pathways by which the effects can happen, and the sensitive receptors, which are likely to be affected. It defines the appropriate level of detail for the information to be provided in the EIAR. In essence, the primary focus of scoping is to define the most appropriate assessment of significant effects related to the proposed development.

A scoping request letter which included a description of the proposed development, draft of the preliminary site boundary and preliminary table of contents was forwarded to consultees on the 16th of August 2018. The recipients included the Local Authority, Government Departments, non-governmental organisations (NGOs), interested parties and key stakeholders. A more detailed scoping report was issued to the same consultees on the 25th of June 2019 detailing the second design iteration.

Table 5.1 over details the list of consultees who were issued a copy of the scoping document. A copy of the scoping request and scoping report are included in Appendix 5.2.



Table 5-1: List of Consultees

Type of Stakeholder	Body / Department
Compotent Authorities	Cork County Council
Competent Authorities	An Bord Pleanála
	Department of Business, Enterprise and Innovation
	Department of Justice and Equality
	Department of Agriculture, Food and the Marine
	Department of Culture, Heritage and the Gaeltacht (NPWS, NIAH & SMR)
Government Departments	Department of Communications, Climate Action and the Environment
	Department of Defence
	Department of Housing, Planning, and Local Government
	Department of the Environment, Community and Local Government
	Department of Transport, Tourism and Sport
	An Taisce
	Birdwatch Ireland
	Fáilte Ireland
	Teagasc
	EPA
	Southern Regional Assembly
	Irish Farmers Association
	Irish Peatland Conservation Council
	The Heritage Council
	Sustainable Energy Authority of Ireland
	Inland Fisheries Ireland
	Irish Red Grouse Association
NGOs and Stakeholders	National Trails Office
	Irish Wildlife Trust
	Bord Gais
	Irish Sports Council
	The Heritage Service
	Commission for Energy Regulation
	Geological Survey of Ireland
	Health Service Executive
	Health and Safety Authority
	Office of Public Works
	Transport Infrastructure Ireland
	Bat Conservation Ireland
	Irish Raptor Group



Type of Stakeholder	Body / Department
	Gas Networks Ireland
	larnród Éireann
	Marine Institute
	Irish Water
	IBEC
	Dublin Chambers of Commence
	The Arts Council
	National Museum of Ireland
	Biodiversity Ireland
	Irish Environmental Network
	Transport Infrastructure Ireland
	Dublin Transport Office
	National Roads Authority
	National Transport Authority
	CIE
	Irish Landscape Institute
	Irish Wind Energy Association
	Irish Planning Institute
	Royal Town Planning Institute
	Royal Institute of Architects of Ireland
	Institute of Geologists of Ireland
	The Mining Heritage Trust of Ireland
	National Building Agency
	Geographical Society of Ireland
	Údarás na Gaeltachta
	Waterways Ireland
	Environmental Sciences Association of Ireland
	An Garda Siochána
	Irish Creamery Milk Suppliers Association
	Bord Na Mona
	Forest Service
	Coillte Teoranta
	Railway Procurement Agency
	Irish Coast Guard
	The Irish Meteorological Service
	The National Anglers
	Mallow Trout Anglers Club
	Mountaineering Ireland



Type of Stakeholder	Body / Department
	Carraig Na Bhfear GAA Club
	Irish Aviation Authority
	Nova Telecom
	Skylink Communications
	Irish Broadband/Imagine
	Munster Broadband
	Digiweb Dublin Offices and Data Centre
	Ripplecom
	Magnet Networks
Telecommunication / Aviation	BT Communications Ireland Ltd
relecommunication / Aviation	Cork Airport Authority
	RTE/2RN
	Now Virgin Media Ireland
	Eir
	Vodafone (Netshare)
	Three
	ESB Telecoms
	TETRA Ireland Ltd.
	TowerCom Ltd.

Full details of the scoping responses received are set out in Appendix 5-1. A summary of the consultation responses received are presented in Table 5.2 over.



Table 5-2: List of Scoping Responses

Consultee	Date of Response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
An Bord Pleanála	22 August 2018	Acknowledge receipt by letter. No comments provided.	N/A
Department of Agriculture, Food & the Marine	3 July 2019	Letter with comments on tree felling and reforestation	Chapter 8 - Biodiversity Chapter 9 - Land Soils & Geology Chapter 10 - Hydrology & Water Quality
Department of Culture, Heritage and the Gaeltacht (NPWS, NIAH & SMR)	21 September 2018	Letter with comments on archaeology	Chapter 14 - Archaeology, Architectural and Cultural Heritage
Department of Justice and Equality	23 August 2018	Acknowledge receipt by letter	N/A
Department of Business Enterprise and Innovation	4 July 2019	Acknowledge receipt by letter	N/A
Department of Communications, Climate Action and the Environment	18 August 2018	Acknowledge receipt by letter	N/A
Development Applications Unit, Department of Culture, Heritage and the Gaeltacht	17 August 2018	Acknowledge receipt by email	N/A
Department of Housing, Planning, Community and Local Government	21st August 2018	Housing Agency holds no property, lands or other interests in the vicinity of the proposed wind farm indicated on the maps supplied	N/A
Health & Safety Authority	17 August 2018	Acknowledged Receipt and forwarded to suitable person	N/A
Health Service Executive	28 August 2019	Letter with comments on health gain and emergency protocol and response.	Chapter 11 - Population and Human Health
Geological Survey of Ireland	28 June 2019	Acknowledged Receipt and forwarded to suitable person	N/A



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Environmental Protection Agency	27 June 2019	Acknowledge receipt by Email	N/A
The Irish Meteorological Service	20 August 2018	Acknowledge receipt by Email	N/A
The Mining heritage Trust of Ireland	15 July 2019	Acknowledge receipt by Email	N/A
Transport Infrastructure Ireland	4 July 2019	Response by letter detailing general guidance for EIAR preparation which may impact on national roads.	Chapter 11 - Traffic & Transport Chapter 15 - Landscape and Visual
Waterways Ireland	17 August 2018	Response received by email. No remit for any area near Cork	N/A
Department of Defence	17 September 2018	Response received – Air Corps Policy in respect of windfarms	Chapter 16 - Telecommunications and Aviation
An Garda Síochána	23 August 2018	Acknowledge receipt by email	N/A
Cork County Council	23 August 2018	Response recommending liaising with An Bord Pleanála in the first instance as it is a Strategic Infrastructure Development	N/A
Fáilte Ireland	4 July 2019	Response received by email with Fáilte Ireland's EIS & Tourism Guidelines.	Chapter 11 - Population and Human Health
Ripplecom	9th July 2019	No radio infrastructure located at the site. One link located near the development. Coordinates provided.	Chapter 16 - Telecommunications and Aviation
2RN	19 th August 2019	Potential interference to television signal. Requested that protocol be signed.	Chapter 16 - Telecommunications and Aviation
Eir	21 August 2018, 22 July 2019	Response stated that there is a link in the vicinity. Coordinates provided. No risk associated.	Chapter 16 - Telecommunications and Aviation
THREE	27 August 2018	Number of links in the region traversing the site. Coordinates provided.	Chapter 16 - Telecommunications and Aviation
Vodafone (Netshare)	17 August 2019	Vodafone Microwave located near a proposed turbine locations. Coordinates were provided.	Chapter 16 - Telecommunications and Aviation



Consultee	Date of Response	Response / Key Points Raised	Chapter of EIAR where Key Points Raised are Addressed
Nova Telecom	02 December 2019	Potential impact to publicly available telecommunications services. Base stations nearby, operating fixed wireless broadband and telephony services for both residential and business customers.	Chapter 16 – Telecommunications and Aviation
Irish Aviation Authority	16 June 2019	Assurance requested that IAA systems are not affected and that flight procedures do not have to be redesigned.	Chapter 16 – Telecommunications and Aviation

5.2.1 Key issues Raised During Scoping Process

The scoping process proved beneficial to the identification of issues and potential issues in relation to the proposed Coom Green Energy Park. Responses from the consultees identified a range of observations which have been taken into consideration in the preparation of the respective chapters of this EIAR.

Issues raised during the scoping process were as follows:

Department of Agriculture, Food and the Marine

The Department advised that if felling of trees is required, a Felling Licence must be obtained before the trees are felled or removed. The Department advised that the contents of Felling and Reforestation Policy document be taken note of. When the Forest Service is considering an application to fell trees, the following applies:

- The interaction of the proposed works with the environment locally and more widely, in addition to • potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise;
- Where a tree felling licence application is received, the Department will publish a notice of the ٠ application before making a decision on the matter.
- Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence.

The Forestry Act 2014 and the Forestry Regulations 2017 (SI 191/2017) set out the provisions for licensing for afforestation, forest road applications, aerial fertilisation licensing and felling licences.

As it is proposed to fell approximately 62.8ha of coniferous forestry for the proposed Coom Green Energy Park development, replant lands of the same area are required. The replacement replanting of forestry can occur anywhere in the State subject to licence. Potential replanting sites have been identified at Moneygorm, Co. Cork and Ballard, Co. Wicklow. The replant lands are assessed in Appendix 3.3.



Department of Culture, Heritage and the Gaeltacht

The Department recommends that an Underwater Archaeological Impact Assessment of any watercourses within the footprint of the proposed development should be undertaken by a suitably qualified and experienced archaeologist. The UAIA shall be licensed by the Department of Culture, Heritage and the Gaeltacht.

If any watercourse proves too deep to facilitate wading survey, then an underwater archaeological dive assessment will be required.

Chapter 13 – Archaeology, Architectural and Cultural Heritage considers impact on watercourses with respect to the footprint of the site and works necessary for cable route and turbine delivery route. All watercourse crossings were inspected, and no surface traces of potential unrecorded archaeological sites or architectural features were noted. Directional drilling will be utilised to avoid impact on watercourses.

Transport Infrastructure Ireland

Recommendations from TII for the preparation of the EIAR are as follows:

- The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
- Consultations should be had with the relevant local authority/National Roads Design Office with regard to locations of existing and future national road schemes.
- In relation to cabling and potential connection routing, the scheme promoter should note locations of
 existing and future national road schemes and develop proposals to safeguard proposed road schemes.
 In the context of existing national roads, alternatives to the provision of cabling along the national road
 network should be considered in the interests of safeguarding the investment in and the potential for
 future upgrade works to the national road network.
- Clearly identify haul routes proposed (construction and operation stages) and fully assess the network to be traversed. In this regard, specifically include considerations of duration of likely impacts. Separate motorway crossing, structure approvals/permits and other licences may be required in connection with proposed haul routes, including temporary modification to the road network may be required. Consultation with the relevant PPP Companies and MMaRC Contractors may also be required. All structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
- TII Traffic and Transport Assessment Guidelines (2014) including the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
- Have regard to any Environmental Impact Statement and all conditions and / or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.
- Assess visual impacts from existing national roads.
- Assessment and design and construction and maintenance standards and guidance are available at TII
 Publications that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual
 of Contract Documents for Road Works (MCDRW).



- The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular:
 - a) Include specific assessment of the visual impact of the construction and operation of the proposed development on the M8 and N20 national road and its users.
 - b) TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006).
 - c) The EIAR should consider the Environmental Noise Regulations 2006 (S.I. 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1st Rev, National Roads Authority, 2004).

Chapter 13 - Traffic and Transportation was compiled in light of TII observations and recommendations. TII guidelines were used where relevant and recommendations such as the requirement for a Road Safety Audit and Road Safety Impact Assessment were taken on board in the preparation of the chapter. Horizontal directional drilling is proposed where the cable route meets the M8 motorway to safeguard the national asset and avoid impacts on future expansion as set out in the advice note. Visual impact has been assessed from national routes in Chapter 15 - Landscape and Visual.

Department of Defence

The Department of Defence issued a copy of their Draft Air Corps Policy in respect of windfarms. This policy details situations where the Air Corps are opposed to tall structures. It comprises lands underlying military airspace used for flying activity; areas where military flying occurs at low level; areas within 3 Nautical Miles of certain national roads and motorways. It should be noted that this policy has no statuary footing and is provided as guidance only. The guidance has been considered and taken into account in this EIAR with respect to aviation safety.

The guidance recommends that in all locations where windfarms are permitted it should be a condition that they meet the following lighting requirements:

- 1. Single turbines or turbines delineating corners of a windfarm should be illuminated by high intensity obstacle lights.
- 2. Obstruction lighting elsewhere in a windfarm will be of a pattern that will allow the hazard to be identified and avoided by aircraft in flight.
- 3. Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-red (IR) range of the electromagnetic spectrum specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.

Chapter 16 - Telecommunications and Aviation has considered the guidance set out by the department of defence and incorporated it into mitigation measures as set out in Section 16.3.4 of this EIAR.



Three

Three have a number of links traversing the area of the development. Three would typically require a 100m buffer from these links to ensure stability of service.

Mitigation measures have been set out in Chapter 16 - Telecommunications and Aviation in order to avoid any impacts on Three services.

<u>Eir</u>

Eir outlined that there is a transmission path in the vicinity of the site and that a 100m buffer would be required so as not to impact on Meteor/Eir Mobile sites.

The EIA process included an investigation into the transmission path as indicated by Eir. The link is located 1.5 km from the site and transmits in an opposite direction from the site. It was concluded that this link would not be impacted upon.

Netshare (Vodafone)

There is a Vodafone Microwave link near the proposed turbine locations and it is requested to avoid a direct line of sight impact of this link when considering the final turbine locations and to maintain a reasonable exclusion zone from the point to point microwave link. Coordinates were provided by the consultee.

Mitigation measures have been set out in Chapter 16 - Telecommunications and Aviation in order to avoid any impacts on Netshare services.

Ripplecom

A response from the procurement section of Ripplecom indicated that there would be no impact on radio infrastructure in the CGEP area, however, one link was identified, located in between T16 and T21. Coordinates are provided. Ripplecom confirmed that the link would not be impacted by the proposed project.

The response from Ripplecom was considered in Chapter 16 - Telecommunications and Aviation in order to avoid any potential impacts on the link as identified.

Competent Authorities

Cork County Council responded and recommended liaising with An Bord Pleanála in the first instance as the development appears to be in the SID category as per the 7th Schedule of the Act. Separate consultations were held with Cork County Council as discussed in Section 5.3 below.

An Bord Pleanála (ABP) were issued a copy of the scoping document and acknowledged receipt. Separate consultations were held with ABP pursuant to the Strategic Infrastructure Development pre-application consultation process. Two meetings were held with ABP before it was acknowledged that the project constitutes Strategic Infrastructure. Further details on this are included in Section 5.3 below.



Fáilte Ireland

In response to the scoping request, Fáilte Ireland provided a guideline on tourism and environmental impacts, published in 2011, entitled 'Guidelines on the Treatment of Tourism in an Environmental Impact Statement'. Of note from Fáilte Ireland's Guidelines is in respect of the assessment of potential effects arising from a proposed development on tourism, the following has been considered:

- Indicate the numbers of premises and visitors likely to be affected directly and indirectly.
- Identify and quantify, where possible, their potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.
- Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.
- Indicate any commercial tourism activity which is likely to be directly affected, with resultant environmental impacts.

This document has been considered, as recommended by Fáilte Ireland. Chapter 11: Population, Human Health and Material Assets describes the potential impacts on recreation, amenity and tourism as a result of the proposed development and in consideration of Fáilte Ireland's guidance.

Irish Aviation Authority

The IAA raised potential aviation safety concerns regarding potential impact on flight calibration and flight plan processing. The IAA requested that their systems would not be affected and that flight procedures would not have to be re-designed as a result of the proposed development. Subsequently, a risk assessment was commissioned by the applicant and conducted by Pager Power. This assessment is included in appendix 16.3. A telephone meeting was held between the applicant and IAA on the 26th July 2019 outlining further assessments required for the satisfaction of the IAA. Following the provision of requested information, the IAA confirmed that they have no objection to the proposed development. The redesigned elements of the project for DI4 were sent to the IAA in correspondence on the 08th of September 2020. No response was received.

Consultation with IAA has shaped the assessment of potential impacts on aviation, as detailed in Chapter 16 of this EIAR.

Nova Telecom

In their initial response, Nova Telecoms identified a number of base stations in the area of the proposed development which operate fixed wireless broadband and telephone services for residences and businesses. Potential impact on services was identified. FT engaged with Nova Telecom between 13 January and 6 March 2020 and again in October and November 2020 along with a Telecommunication specialist AI bridges to ascertain what impact if any would result from the proposed development. Nova Telecom indicated that a small percentile of customers will be affected particularly south facing.

Standard mitigation options were presented which would involve a detailed pre-construction study and design of a bespoke technical solution in agreement with Nova Telecom. Mitigation measures include the installation of a relay base station that will be deployed at a suitable location in the vicinity of the proposed development that would provide additional coverage to service subscribers from one of Nova Telecom's Primary Transmitters in the area.



Relay Base station infrastructure has already been deployed in the vicinity of the proposed development area. All mitigation works will be carried out in consultation with the service provider to ensure any interruption to service will be mitigated against.

5.3 Consultation with Key Stakeholders

5.3.1 First Meeting with Cork County Council

As the local authority responsible for the area, Cork County Council (CCC) were consulted in a pre-planning style meeting in order to inform the authority of the project and to receive observations regarding design and potential environmental impacts.

The meeting took place on the 15th November 2018, at Cork County Hall. Those in attendance were:

- Noel Sheridan Senior Planner Cork County Council
- Enda Quinn Planner Cork County Council
- John Redmond Planner Cork County Council
- Tom O'Donnell Brookfield Renewable Ireland
- Claire Deasy Brookfield Renewable Ireland
- Keith Neary Brookfield Renewable Ireland
- Jim Hughes Fehily Timoney and Company
- Trevor Byrne Fehily Timoney and Company.

The meeting was focused on Design Iteration 1 (DI1). The agenda of the meeting included the presentation of the project and description of stakeholders involved, a description of the work carried out to date, presentation of the project with respect to policy objectives and the intention to apply for the Strategic Infrastructure Development process.

Key feedback from CCC included landscape and visual impact on the Blackwater Valley and presentation and methodology of the landscape visual impact assessment (LVIA), including the need for a greater number of representative viewpoints from a greater scope of positions. The scale and extent of the DI1 was also discussed.

CCC raised concerns about biodiversity including the need to consult with the CCC heritage unit. The maturity and harvesting of the commercial forestry of the area was also raised. Noise with respect of the Wind Energy Guidelines was discussed and reference to the forthcoming guidelines was made, along with a description of the methodology for noise limit scenarios. Transport aspects such as delivery and cable route were presented. CCC recommended contacting the area engineers.

Following this meeting, the CCC heritage officer was contacted in relation to biodiversity and the CCC roads department was contacted in relation to traffic and transport and general civil engineering issues.

Feedback from this meeting contributed to the refinement of the project and informed Design Iteration 2 which was presented to CCC at a follow up meeting. In particular the layout was amended to avoid significant landscape impacts on the Blackwater Valley.



5.3.2 Second Meeting with Cork County Council

A second meeting was held with Cork County Council on the 19th June 2019 to present the updated layout, taking into consideration feedback from the first meeting and addressing the recommendation of An Bord Pleanála to consult with Cork County Council with regard to Landscape Policy.

Those in attendance were:

- Niall O'Donnabhain Senior Planner Cork County Council
- Noel Sheridan Senior Planner Cork County Council
- Sharon O'Connell Planner Cork County Council
- James Dineen Brookfield Renewable Ireland
- Claire Deasy Brookfield Renewable Ireland
- Kieran O'Malley Coillte
- Jim Hughes Fehily Timoney and Company
- Richard Barker Macro Works.

The history of the project was outlined including the consultations that have taken place since the previous meeting in November 2018. The reduction in the number of turbines and the removal of turbines from the Nagle Mountains ridgeline was discussed.

The attendees were shown a number of photomontages of the development and feedback was requested from Cork County Council with regard to the interaction of the project with the Cork County Development Plan landscape policy, in particular the scenic route in proximity to the proposed development. Following the meeting, no further response was received from Cork County Council apart from the response to the scoping letter as set out in Section 5.2.1.

5.3.3 Meeting with Cork County Council Road Engineer and Senior Engineer

Meetings took place on the 18th June 2019 at Fermoy Town Hall, and the 1st of July 2019 at the Cork County Council offices, Mallow. In attendance were:

18th June 2019

- Brendan O'Gorman Cork County Council
- James Redmond Fehily Timoney and Company
- David Walsh Fehily Timoney and Company

1st of July 2019

- Aidan Weir Cork County Council
- James Redmond Fehily Timoney and Company

The aim of the meetings was to discuss potential impact on the surrounding road network in the vicinity of the proposed CGEP, with particular focus on the proposed turbine delivery routes and grid connection routes serving the development.



Following a presentation of the plans and work to date, points raised by CCC included the different municipal areas which the CGEP falls within, future improvements to the N72, provision of pre and post road condition surveys as a condition of planning permission, attention to water crossings on the TDRs, maintaining sightlines at site entrances and directional drilling which may impact on CCC lands. CCC also indicated that Road Opening Permission must be acquired from the RMO to carry out site investigation works within the public road corridor. Issues raised were noted and incorporated into Chapter 13 – Traffic and Transportation.

Recommendations were made to contact certain members of CCC including CCC Property Section for access to council lands and for letters permitting development and planning applications over council owned lands, CCC Roads Department regarding information on future N72 improvements, and Transport Infrastructure Ireland, who had been previously contacted in relation to the project. Recommendations were noted.

5.3.4 Pre-application Consultation Meeting with An Bord Pleanála

An initial pre-application consultation meeting took place with An Bord Pleanála (ABP) on the 5th of June 2019 at the ABP offices, Marlborough Street, Dublin. The meeting was in relation to an application for Strategic Infrastructure Development for the CGEP.

In attendance were:

- Brendan Wyse An Bord Pleanála
- Karla McBride An Bord Pleanála
- Ellen Morrin An Bord Pleanála
- Fergal Kilmurray An Bord Pleanála
- James Dineen Brookfield Renewable Ireland
- Claire Deasy Brookfield Renewable Ireland
- Kieran O'Malley Coillte
- Sinead O'Malley Coillte
- Jim Hughes Fehily Timoney and Company
- Trevor Byrne Fehily Timoney and Company.

The meeting began with a presentation including an introduction to the applicants, a description of the proposed development at Design Iteration 2 (DI2), description of the development of the project from initial concept through to the 22 turbine DI2 layout, and information on surveys and studies completed to date.

The Board representatives indicated that their preliminary view of the proposed development was that it constitutes strategic infrastructure development. The Board representatives then advised on subject matter to address during the application process and potential impacts associated with the proposal. Main issues included:

- Visual impacts
- Recorded monuments and Architectural Conservation
- Alternative grid connections
- Peat stability and water management
- Freshwater Pearl Mussel Catchment



- The road network
- Community gain
- Issues arising from consultations.

The Board's representatives concluded the meeting, indicating that a record of the meeting would be forthcoming, and that the Board will wait for the prospective applicants to revert for a second meeting. A record of this meeting is included in Appendix 5.3, along with additional correspondence from An Bord Pleanála.

5.3.5 Further Pre-application Consultation Meeting with An Bord Pleanála

A second pre-application consultation meeting took place with An Bord Pleanála (ABP) on the 7th of August 2019 at the ABP offices, Marlborough Street, Dublin. The meeting was in relation to an application for Strategic Infrastructure Development for the CGEP. In attendance were:

- Brendan Wyse An Bord Pleanála
- Karla McBride An Bord Pleanála
- Ellen Morrin An Bord Pleanála
- Fergal Kilmurray An Bord Pleanála
- James Dineen Brookfield Renewable Ireland
- Claire Deasy Brookfield Renewable Ireland
- Kieran O'Malley Coillte
- Richard Barker Macro Works
- Jim Hughes Fehily Timoney and Company
- Trevor Byrne Fehily Timoney and Company.

The applicants presented progress made on the proposal since the initial meeting. This was focussed on issues raised by the Board's representatives in the first meeting. Visual impact assessment was presented including up to date photomontages. With respect to recorded monuments and architectural heritage, a description of the studies to date along the turbine delivery route was presented and impacts assessed.

The applicant identified the preferred grid route options and outlined the advice issued by Eirgrid regarding substation capacity in the area. The applicant presented site investigation information with respect to peat stability and associated hazards. The limited areas of peat deposits were outlined and the inclusion of an outline drainage design, stormwater management and soil management plan were specified to be included as part of the planning application.

The Freshwater Pearl Mussel was discussed. Aquatic ecological surveys concluded that the CGEP catchment which includes the designated River Bride does not support the species.

Hydrological pathways to the River Blackwater was mentioned, however, it was noted that the Freshwater Pearl Mussel is no longer listed as a Qualifying Interest for the Blackwater River SAC. Notwithstanding, the applicant set out that through design measures and effective mitigation the species and habitat would not be impacted.

With regard to the road network, the applicant set out best practice measures which the planning application will adhere to with regard management of transport infrastructure, turbine delivery, upgrades and reinstatement.



A description of public and stakeholder consultation to date was outlined and the anticipated community benefit scheme as detailed in the forthcoming Renewable Energy Support Scheme was set out. Finally, the applicant described the bat and bird surveys undertaken to date.

The representatives of the board concluded by setting out requirements and procedures for the Strategic Infrastructure Development process and issued meeting minutes which are included in Appendix 5.3.

On the 4th November 2019, ABP issued their correspondence confirming that the project represents Strategic Infrastructure Development and the application should be made directly to ABP. A list of prescribed bodies to be notified of the application for the proposed development was also included. A copy of same is included in Appendix 5.3.

5.3.6 Consultation with Inland Fisheries Ireland

A meeting was held on site with Inland Fisheries Ireland (IFI) on the 21st of August 2019 during which inspections took place of water crossing points, both on the public road and within the development site associated with the proposed grid connection cable route and the proposed internal access road network. Crossing points were inspected, and preferred design solutions and construction methodologies were agreed for both the examined crossing points and generally throughout the site.

The applicant was represented by the CGEP project manager from Brookfield Renewable Ireland, senior project team members from Fehily Timoney & Company and Inis Environmental Consultants.

5.3.7 <u>Consultation with National Parks and Wildlife Service</u>

Inis Environmental Consultants made contact with the Development Applications Unit (DAU) of the National Parks and Wildlife Service (NPWS) in November 2017 requesting comments on the proposed project. Receipt was received on the 18th of December 2017 stating that in the event of observations, the applicant will receive a co-ordinated heritage-related response by email from DAU. The reference number issued by the NPWS for the project is "G Pre00256/2017". A request was then sent to the DAU for a pre-planning consultation meeting 8th of January 2018. Receipt of the correspondence was issued by the DAU stating that in the event that the NPWS is in a position to facilitate your meeting request, you will receive a co-ordinated heritage-related response by email from Unit (DAU) on behalf of the Department.

Inis Environmental Consultants issued correspondence to the NPWS on the 13th of February 2019 requesting that consultation take place between the project ecologists and the NPWS Division Ecologist prior to submission of the planning application for the CGEP. The NPWS Division Ecologist responded stating that due to a waiting list of priority cases until mid-March, the NPWS will be unable to attend any pre-planning meetings. A further request was made for a meeting to be facilitated following this period, however, the NPWS Division Ecologist stated that a meeting could not be guaranteed due to increasing workloads.

Inis Environmental Consultants issued further correspondence to the DAU on the 26th of March 2019 and the 13th of January 2020 requesting observations regarding biodiversity and the proposed CGEP, however, no response was received.

On the 7th of September 2020, FT issued correspondence to the DAU detailing information around the redesigned elements of the project as part of Design Iteration 4, as detailed in section 5.3.8. A request for comments on the redesigned elements of the project was included. No further correspondence was received from the DAU.



5.3.8 Prescribed Bodies

As part of the SID application process, an Bord Pleanála have issued a list of prescribed bodies considered relevant to the project. The list is included below. FT had previously issued correspondence to these organisations as part of the scoping process; however, further correspondence was issued to the prescribed bodies on the 7th of September 2020 in order to inform of the redesigned elements of the project as part of Design Iteration 4. FT invited comments on environmental issues surrounding the redesigned elements.

Correspondence was received from Transport Infrastructure Ireland (TII) who provided general guidance on potential impact on the national roads network and provided reference to relevant TII guidance that should be considered in the assessment of the project. A response was also received from the Felling Section of the Department of Agriculture, Food and the Marine which reiterated previous correspondence regarding the felling and removal of trees.

Telecommunication companies were also contacted at this time where previous potential impact to telecommunication service was identified during the scoping phase. The companies were asked to comment on the redesigned elements of the project in order to identify potential impacts to service. Nova Telecom, in consultation with FT and Telecommunication specialists AI Bridges, were presented with mitigation solutions where a small number of customers would potentially be impacted by the proposed project. All mitigation works will be carried out in consultation with the service provider to ensure any interruption to service will be mitigated against. Further details of communication with Nova Telecom is included in Chapter 16: Telecommunication and Aviation.

Correspondence received in late 2020 regarding Design Iteration 4 is included in Appendix 5.5.

The list of prescribed bodies as recommended by an Bord Pleanála includes the following:

- Cork County Council
- Minister for Housing, Planning and Local Government
- Minister for Culture, Heritage and the Gaeltacht (DAU)
- Minister for Agriculture, Food and the Marine
- Minister for Communications, Climate Action and Environment
- Minister for Transport, Tourism and Sport
- Inland Fisheries Ireland
- Transport Infrastructure Ireland
- Environmental Protection Agency
- The Heritage Council
- An Taisce
- An Chomhairle Ealaíon
- Fáilte Ireland
- Irish Aviation Authority
- Health and Safety Authority
- Irish Water



5.4 Community Consultation and Public Information Events

In line with the Code of practice for Wind Energy Development in Ireland, the developers of the project appointed a Community Liaison Officer (CLO) to engage with the public throughout the development of the project. The CLO was responsible for communication between the public and the developer's team. The CLO's role included door to door consultation with community members within 2km of the proposed development, distribution of project materials to community members, follow up meetings with community members where requested, liaison between local residents and the project team, communication of any project updates and circulation of information regarding upcoming public events.

Project information was distributed by leaflet drop to houses within a 5km radius of the proposed development. Furthermore, community information events and technical workshops were held to provide information about the project, to discuss the details of the project with the public and to inform the design of the project through feedback from the community. A dedicated project website was set up which presented updates on the project and hosted a platform for the downloading of project information. The project website also included an email address to relay any queries and the phone number of the CLO. The website was utilised further for consultation during the COVID-19 pandemic restrictions in 2020, as detailed in Section 5.4.6. The website address is as follows:

https://www.coomgreenenergy.com/

5.4.1 Door to Door Community Engagement

The CLO commenced their role in March 2018 with door to door community consultation. The CLO was accompanied by a technical expert with experience of wind farm development. All dwellings within 2km of the proposed turbines were visited with the intention of meeting all households to inform them of the project and relay feedback to the development team in order to inform the design process of the project. This included follow up calls to community members who may have missed the initial visit.

Further door to door consultation took place in September 2018 where the community members were presented with a project information leaflet, a map of DI1 and contact information for the CLO. Follow up door to door visits were conducted in February and March 2019 in order to meet with any households within 2km of the development who had not yet been engaged with.

A final round of door to door community consultation took place in June, July and August 2019. All dwellings within 2km of the proposed development were visited and a printed map of DI2 and an updated project information leaflet was presented to each household. Each household was informed of further public information events and the expected timeline for a planning submission was also set out. Where respondents were not at home, a printed map of DI2 and a project information leaflet was left in each letterbox.

The project information leaflet set out contact details for respondents to organise a call-back meeting if they wanted to discuss any aspect of the project. A number of call-back meeting requests were received and meetings were arranged for each one.

5.4.2 Engagement with Community Councils

The CLO was responsible for communication with a number of local Community Councils in the area. Community Councils are voluntary organisations, providing a forum to raise and deal with any issues of possible importance to the community.



They advise, petition, influence and advocate numerous causes and cases of concern on behalf of local communities and were therefore considered a significant stakeholder in relation to the CGEP project.

Initially in July 2018 the Community Councils of Glenville and Mourneabbey were contacted as these communities are located in proximity to the development. Further meetings were held with Community Council Representatives in September 2018. Representatives from the Community Councils who agreed to meet the project team included Glenville, Mourneabbey, Carrignavar, Whitechurch and Ratchduff, covering the majority of the greater area of the proposed development. Contact information for each Community Council was sought for circulation of information regarding future public events.

5.4.3 <u>Community Information Events November/December 2018</u>

Three community information events were held in November and December 2018. These events took place at Glenville (28th November 2018), Mourneabbey (30th November 2018) and Whitechurch (5th December 2018). The objective of these workshops was to inform the local communities of the proposed development, to provide information pertaining to the proposed development and to seek feedback from the local community in terms of local knowledge in order to inform the design process and highlight issues that need to be addressed in the EIAR.

Technical experts were in attendance focusing on noise, civil engineering, transport, ecology, landscape, community benefit and the planning process. Project information was presented including maps and photomontages. A map of the initial design iteration, DI1, was provided for each attendee as well as a leaflet of general project information.

The community engagement events were advertised locally, in The Corkman Newspaper on 22nd November 2018 and in The Avondhu Newspaper on the 22nd November 2018. Advertisements for the events were also posted on notice boards in local shops and community centres. C. 70 people attended the event at Glenville, c. 70 people attended the event at Mourneabbey and c. 45 people attended the event at Whitechurch.

Feedback forms were available to attendees and a total of 56 feedback forms were completed from the three public events.

The main issues documented included:

- Lack of detailed information provided
- Communication prior to events was poor
- A request for technical workshops
- More engagement with the community
- Potential devaluation of property
- Noise
- Shadow flicker
- Visual impact
- Ecological concerns
- Traffic impact
- Health impacts
- Community benefit.





Plate 5-1: Photographs of Community Engagement Event at Glenville, 28th of November 2018

The information gathered at the event was circulated to the team producing the EIAR in order to inform assessments and studies. This resulted in a more in-depth focus on areas of concern to the public. Relevant topics raised during the engagement have been addressed in detail throughout the EIAR.

The information gathered also informed DI2 which was issued following the public's input. This included a design change to remove 5 no. turbines as well as the re-siting of a number of turbines to reduce potential impacts on nearby receptors. An alternative cable route was also considered on foot of this engagement, to reduce potential impacts on the local road network as a result of construction works. This resulted in an alternative route which brings much of the cable through private lands in and around the CGEP site area.

5.4.4 Technical Workshops April/May 2019

5 no. technical workshops were organised during May 2019. The workshops took place in the Blarney Woollen Mills Hotel. The 5 no. workshops were intended to focus on a specific topic and to include attendees who lived in the locality who may be specifically impacted by the topic or who showed a specific interest or concern regarding the topic. Invitations were sent out to approximately 30 households as well as representatives of the community councils with the intention of engaging in discussion to inform further design changes and provide technical expertise to those who wished to avail of it.

The 5 no. respective topics included the following:

- Noise
- Engineering: Grid/Construction/Transport/Storage
- Community Benefit
- Ecology
- Visual impact.

The initial workshop, which took place on the 9th of May 2019, focused on noise and included a technical expert who presented information regarding noise and wind turbines. The presentation included methodology of assessment, including the measurement of background noise and computer modelling. EPA noise guidelines and Irish noise standards were discussed and potential mitigation processes were set out.



The presentation was followed by a discussion between the c. 90 attendees and the applicant's panel which included the project management team, the technical expert and a chairperson. Consensus from the feedback received was that the workshop was too technical and many attendees were unable to understand many points raised.

The second workshop, which took place on the 14th of May 2019, focused on the engineering aspects of the proposed development and followed the same format as the previous, including a presentation by a technical expert followed by a discussion. In light of the feedback received from the initial workshop, a less technical approach was employed. The second workshop was attended by c. 90 members of the public. Consensus from the feedback received was that the information provided was too general and specifics were not stated such as turbine type. The remaining 3 no. technical workshops were cancelled in agreement with the attendees. It was concluded that the format of the workshops combined with the over subscription of attendees did not result in the desired outcome and proved unworkable in both informing the public and gaining insightful knowledge for the design and EIAR processes.

Following assessment of the notes taken during each workshop and the feedback received, a detailed set of Q and A style information sheets were presented on the project website to inform the public of any knowledge gaps that occurred at the events, and to attempt to describe the content in a less technical manor.

5.4.5 Community Information Events October 2019

Two public information events were held in October 2019. These events were intended to present the final design iteration and technical assessment results to the public which was a result of consultation feedback and environment assessment which took place over the two-year development period. The events took place on Tuesday, October 8th, 2019 at Mourneabbey Community Hall and Thursday, October 10th, 2019 at the Holy Family Centre, Glenville. The events were advertised in The Corkman and The Avondhu Newspapers prior to the event and flyers were posted on notice boards in local shops and community centres.

Correspondence was sent directly to local community groups and a list of residents who requested to be notified of the events. A copy of the newspaper advertisements and flyers are contained in Appendix 5.4.

The events were presented by the project team which included members from Brookfield Renewable, Coillte and technical experts from Fehily Timoney and Company, Inis Ecology and Macro Works, who were available to answer queries. The event was presented as an open public information session with display boards presenting project information and maps. Pano-pods were used to show panoramic images of the proposed development in the existing landscape. The event in Mournabbey was attended by approximately 66 attendees. The event in Glenville was attended by approximately 87 attendees.





Plate 5-2: Photographs of Community Engagement Event at Glenville, 10th of October 2019

5.4.6 Virtual Exhibition November 2020

Due to the government restriction in place for gatherings and indoor events as a result of the COVID-19 epidemic it was not possible to hold a live public engagement event in 2020. In order to overcome this difficulty a website was launched in November 2020 to create a virtual exhibition providing information on the main energy park design. The virtual exhibition could be accessed from the main project website www.coomgreenenergy.com.

The content included poster style information boards which provided further information on the various design disciplines for the development including project layout, Community Benefit, Transport and Turbine Delivery Grid Connection and Energy Storage, Ecology and Biodiversity, Landscape and Visual Amenity. Powerpoint presentations were available from Noise and LVIA experts. Members of the public were informed of the virtual exhibition via posters in local shops, leaflet drop to nearby households and email communication for those requesting to be notified of events directing people to the www.coomgreenenergy.com website where the virtual exhibition could be accessed. In the first week the website was live there were 114 visits to the site. The virtual exhibition will remain live for a minimum of 2 months after the planning application is submitted.

An image of the online exhibition is included below in Plate 5-3.

CLIENT: Coom Green Energy Park Limited Coom Green Energy Park - Volume 2 – Main EIAR Chapter 5 – EIA Scoping, Consultation and Key Issues PROJECT NAME: SECTION:





Plate 5-3: **Screenshot of Online Virtual Exhibition**



5.4.7 **Consultation Summary**

Table 5-3: Summary of public and stakeholder consultation for the CGEP

Summary of public and stakeholder consultation for the CGEP					
2018	March	Door to door community consultation commenced			
July		Local community groups consultation commenced			
	August	Scoping request letter issued to statutory and non-statutory consultees			
	November	Pre-application consultation meeting with Cork County Council			
	December	Community engagement events held on DI1			
2019	February	Door to door community consultation			
	May	Two technical workshops held on Noise and Engineering			
	June	Door to door community consultation on DI2			
	June	Scoping report issued to statutory and non-statutory consultees			
June Pre-ap		Pre-application consultation meeting with An Bord Pleanála			
	June	Second pre-application consultation meeting with Cork County Council			
	July	Meeting with Cork County Council Roads Engineers			
	July	Door to door community consultation on DI2			
	August	Second pre-application consultation meeting with An Bord Pleanála			
	August	Meeting with Inland Fisheries Ireland			
	August	Door to door community consultation on DI2			
	October	Community engagement events held on DI3			
2020	November	Virtual exhibition created on the project website for DI4			
	November	Leaflet drops to local households and email communications distributed			
	November	Posters placed in local shops informing of virtual exhibition for DI4			

5.5 **Key Issues**

5.5.1 Key Issues Raised During Scoping and Pre-Application Consultation

Overall, the feedback collected during scoping and consultation process for the CGEP development project was beneficial in identifying public concerns which informed the design of the project, established areas of assessment, established appropriate assessment methodologies and identified gaps in knowledge which benefitted the environmental assessment of potential impacts of the CGEP on the environment. Responses from consultees identified a range of observations which have been taken into consideration in the preparation of the respective chapters.



A number of the consultee responses received as part of the EIA scoping exercise raised concerns regarding the potential impacts of the scheme. A summary is provided below of the primary concerns raised during the scoping process.

- In terms of potential impact to telecommunication, consultation responses from Eir, Netshare, Ripplecom and Three described the potential effects on transmission links in the vicinity of the CGEP and identified the position of the links by providing GPS coordinates. This information was considered in the design of the project and resulted in the consideration of mitigation measures as set out in Chapter 16, Telecommunication and Aviation.
- A consultation response received from the Department of Agriculture, Food and the Marine referred to tree felling and reforestation. Following this response, it was acknowledged that a replanting appraisal should be carried out as part of the EIAR. An appraisal of replant lands is included in each chapter where relevant.
- A consultation response received from the Department of Arts, Heritage and the Gaeltacht referred to the assessment of underwater archaeology. Chapter 14, Archaeology, Architectural and Cultural Heritage details the inspection and assessment of watercourse crossings and potential impact on protected structures and records of monuments and places. No works within watercourses are proposed. No surface traces of potential unrecorded archaeological sites or architectural heritage features other than the road bridges were noted.
- A consultation response from Transport Infrastructure Ireland detailed many considerations and methodologies to follow in the assessment of the impact on the road network. These recommendations were taken on board in Chapter 13, Traffic and Transport. Furthermore, consultation with Cork County Council engineers took place in order to further consider local matters with respect to transport infrastructure.
- A consultation response received from the Health Service Executive indicated opportunities for health gain as part of the proposed project and set out recommendations for emergency planning. These aspects informed the assessment included in Chapter 11, Population, Human Health and Materiel Assets.

With regard to the issues raised during the pre-application consultation, An Bord Pleanála representatives set out a range of observations, including visual impact, architectural conservation, alternative grid connections, peat stability and community gain and consultation. This is detailed in section 5.3.3. These issues were considered following the initial pre-application meeting, and detailed assessments and solutions were presented to the Board's representatives at the second pre-application meeting, as detailed in section 5.3.4. It should be noted that the purpose of the pre-application consultation is for An Bord Pleanála to determine whether or not the proposed development is regarded as strategic infrastructure development.

The representatives of the board may provide advice on the prospective application. It is not the purpose of pre-application consultations for An Bord Pleanála to conclude on the merits of a case.

Consultation with Cork County Council focused on the Cork County development plan with visual impact at the forefront of the discussion with regard to the Blackwater Valley. Following the first pre-application consultation the scheme was amended with the removal of turbines from the ridge line of the Nagle Mountains. Assessment methodology was discussed, and photomontages of the proposed project were presented as part of the meetings. Biodiversity and transport were raised as concerns and resulted in further consultation with the County Heritage Officer and Cork Roads Office with respect to assessment methodologies.



5.5.2 Key Issues Raised During Public Consultation

During the public consultation process many concerns were raised by the local community both during public meetings and during door to door calls. The Community Liaison Officer and project team were active in addressing all concerns the public had.

This involved follow up meetings and call backs to specific households who required further information.

All reasonable requests for information were followed up on including delivery of maps and specific information that had been requested by a household. The following is a summary of the main issues and concerns arising during the public consultation process.

<u>Noise</u> – Noise proved to be one of the most contentious issues raised during the public consultation process. As a result, a technical workshop was held to focus on the issue which provided information from a technical expert in the field. Facts and information were provided on the project website and a technical expert on noise was present at each of the public consultation events. The public were assured that the proposed development will comply with the relevant noise limits as set out in the Draft Revised Wind Energy Development Guidelines (2019). The increased setback distance of 750m from dwellings also mitigates against noise intrusion at dwellings.

<u>Shadow flicker</u> – Many members of the public were concerned that their residence would potentially be impacted by shadow flicker. In response to this the developer has committed to zero shadow flicker, in line with recommendations of the Draft Revised Wind Energy Development Guidelines (2019). Mitigation has been proposed to reduce shadow flicker so far as possible, as set out in Chapter 12: Shadow Flicker which will result in zero hours of shadow flicker at nearby residential receptors.

<u>Visual</u> - A concern brought up throughout the consultation process from the local and greater community was visual impact. The developer has chosen to reduce the overall density of wind turbines while maximising the potential energy production of the proposed turbines. This aims to reduce the overall visual impact on residents in close proximity to the development but will cause greater impacts from certain views from a distance. DI2 removed 4 no. turbines from the ridgeline of the Nagle Mountains in order to reduce visual impact of the overall development and a 750m setback distance was applied to protect residential amenity.

<u>Traffic</u> - Concerns were raised by members of the public whose dwellings are located along the proposed grid route. Potential for disruption during the construction and installation of sections of the underground ducting may impact on local access. This issue was considered and taken into account in the CEMP for the project. Furthermore, an alternative grid route was provided for in DI2 and subsequent design iterations which removes a large section of the route from the public road, reducing potential impact on local access during construction.

<u>Battery Storage Safety</u> - Concerns were raised regarding fire safety and the proposed battery storage units. In relation to Irish regulations, pursuant to the Building Regulations 197-2013, The containers and substation building will be required to have obtained a Fire Safety Certificate as outlined in SI 496, prior to operation.

Pursuant to the Fire Services Act 1981 and 2003, there is a requirement to provide adequate active and passive Fire Safety Management Systems. Under Clause 18(2) of this legislation the owners/ management of the facility have a duty of care to provide a safe premise with respect to Fire Safety. Developments of this type typically incorporate the following best practice safety features:

- Full fire safety risk analysis; of the battery packs, the storage container, the surrounding substation and woodland.
- Fire wall installation throughout the facility to limit thermal runaway.



• Integration of a fixed fire suppression system.

Initially two battery storage facilities were included as part of the project. This was reduced to one following the consultation input to the design of the project.

Feedback on proximity and set-back distance - During the consultation process many people expressed a desire to have the distance between turbines and houses increased.

At an early stage in the project the developer committed to a setback distance of at least 750m between proposed turbines and dwellings. This resulted in the removal of T1 which was located within 750m of a dwelling (measurement from turbine location to the main dwelling structure). The 750m setback exceeds the existing minimum setback distance regulation of 500m as set out in the Wind Energy Development Guidelines (2006). It also exceeds the setback requirements set out in the Draft Revised Wind Energy Development Guidelines (2019) which states that turbines should be set back 4-times the tip height distance from the nearest point of the curtilage of any residential property in proximity to the proposed development, subject to a mandatory minimum setback of 500 metres. The proposed CGEP achieves this by providing four times tip height (676m) and a minimum of 74m to allow for curtilage.

5.6 Conclusion

Consultation was sought from a number of stakeholders, including Cork County Council, An Bord Pleanála. Government departments, Non-Governmental Organisations, telecommunications providers, aviation organisations, local councillors, community groups and local residents. Their comments and feedback were incorporated into the design iterations and subsequently into the EIAR as identified in this chapter.

Pre-planning consultation was held with both Cork County Council and An Bord Pleanála to determine the key points and potential impacts of the proposed development and to inform the assessment methodology.

Public consultation was facilitated over a 2-year period by having a dedicated Community Liaison Officer on the ground by way of door to door house calls and leaflet and letter drop to ensure locals were made aware of the details of the project and processes involved. A dedicated phone line and email address were provided with circulated materials so members of the public could directly contact the project team. This process was commenced as early as possible in order to inform the design of the project and to inform the EIA process. A dedicated website was also set up to allow for further open communication between the applicant and community throughout the iterative design process and run-up to the application submission.

Beyond the work of the Community Liaison Officer, public information events were organised to engage with the greater community and present detailed information. Focused workshops were held with the aim of providing information on technical subjects that require detailed explanation and to encourage discussion.

Observations and issues that arose during the scoping and consultation process have informed the design, assessment and mitigation measures proposed as part of this project. Of significance here is the reduction in the quantum of turbines from 39 no. to 22 no. during the design evolution, the commitment to providing a greater set-back distance of at least 750m between turbines and dwellings (main dwelling structures) and the commitment to zero shadow flicker at dwellings in proximity to the CGEP.



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