Our Ref: 210202
Your Ref: N/A

30th April, 2021

Re: Informal Environmental Scoping Request for an Extension of Operation of Carnsore Wind Farm, Carnsore Point, Co. Wexford.

To whom it concerns,

ESB Generation & Trading, Renewables Operation and Maintenance (O&M) intends to apply to Wexford County Council (WCC) for planning permission to extend the operational period of the existing Carnsore Wind Farm (CWF) for an additional 15 years. The CWF is located approximately 8 kilometres (km) south of Rosslare Harbour and approximately 15km east of Kilmore Quay in County Wexford, as shown on Figure 1-1 attached.

The existing wind farm consists of a total of 14 No. turbines with a rated capacity of c.12 megawatts (MW) which became operational in 2002 and is connected to the national electricity grid by a medium voltage 38 kilovolt (kV) underground cable (1km) and overhead line (10km), which runs northwest from the wind farm to the Killinick 38kV substation.

The initial CWF 14 turbine development was first granted planning permission by ABP in 2000 (ABP Ref. PL26.116487) and subsequently developed by ESB and/or their agents. A later planning permission for minor works at the site was granted by Wexford County Council (WCC) in 2017 (Reg. No. 20161337). An Environmental Impact Statement (EIS) was prepared and submitted as part of the initial application. The wind farm has been owned, operated, and maintained by ESB since its commissioning in 2002, with the current planning permission set to expire in August 2022. Condition No. 2 of WCC Reg. No. 2016/1337 states that continued operation of the wind farm beyond the expiry date should be subject to further planning permission being granted.

Proposed Development

Planning permission is being sought from WCC to enable the existing wind farm to continue operating in its current form (with minor upgrades to the turbines and electrical components) for an additional 15 years. It is not proposed to alter the current 14 turbine layout or infrastructure and no significant ground works are required. Minor upgrade to some electricity infrastructure will be required and will be assessed in the Environmental Impact Assessment Report (EIAR).

The relevant classes/scales of development that require Environmental Impact Assessment (EIA) are set out in Schedule 5 of the Planning and Development Regulations 2001 to 2020. The relevant class

of development in this case relates to "installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts", as per paragraph 3(i) of Part 2 of Schedule 5. The proposed development exceeds 5 turbines and 5MW in scale, and therefore is required to be subject to EIA.

An EIAR, Appropriate Assessment Screening Report (AASR) and/or Natura Impact Statement (NIS) are required to be prepared and submitted as part of the new planning application.

McCarthy Keville O'Sullivan Ltd. (MKO) has been appointed as Environmental Consultants for the project and will prepare an Environmental Impact Assessment Report (EIAR) in support of the planning application. The EIAR will be prepared in accordance with the requirements of Schedule 6 of the Planning and Development Regulations 2001, as amended, Directive 2014/52/EU, amending Directive 2011/92/EU, relating to the information to be contained in an EIAR, and the Environmental Protection Agency (EPA) *'Draft Guidelines on the Information to be contained in Environmental Impact Assessment Reports'* (2017) The Environmental Impact Assessment (EIA) of the proposed development will be undertaken by Wexford County Council as the competent authority.

This Scoping Document provides details regarding the development and the subject site and sets out the proposed scope of work for the EIAR. Consultees are invited to contribute to the EIAR informing the planning process by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. We would welcome any comments you have at this stage of the process. The list of consultees to whom the Scoping Document has been circulated is provided in Appendix A, attached to this letter.

Brief Background and Description of the Development Site

The Carnsore Wind Farm (CWF) was one of Ireland's early onshore wind energy developments, first developed by Hibernian Wind Power, a subsidiary of ESB in 2002. The development site was identified as particularly suitable for wind power due to its consistent wind speeds, proximity to existing grid infrastructure, existing access roads, low population density and Local Authority designation as suitable for an energy project.

The CWF site is located on a coastal headland (Carnsore Point), 8km south of Rosslare Harbour, 10km south of Rosslare Town and approximately 15km east of Kilmore Quay, in County Wexford, as illustrated in Figure 1-1 (attached). The wind farm development lands cover approximately 80 hecatres (ha) with a development footprint of circa 4.5ha. The development consists of 14 no. Vestas 850 kilowatt (kW) turbines with a blade tip height of 75m (50m tower, 25m blades). The turbines are situated on the east and centre of the site, arranged in three lines following a general north-south configuration. Six of the turbines along the east and southern site boundary are located within 50m of the coastline. The site also incorporates a substation, control building and switchyard, approx. 3.7km of internal access roads and a meteorological mast.

The current development site incorporates 7 townlands in County Wexford, which are listed in Table 1 below.

Table 1 Townlands associated with Carnsore Wind Farm site.

No.	Townland Name
1	Nethertown
2	Bunarge Street
3	Vogues
4	Summertown
5	Shilmore
6	Shilmore Bush
7	Lady's Island

The site is low-lying and has a maximum elevation of 15 metres above ordnance datum (mAOD). The southern portion of the site is characterised by sand dunes, while the remainder of the site consists of arable land used for crops, pasture and rough grazing. No changes to the beneficial agricultural use of the site are proposed. There are no significant watercourses within the site boundary. There are a number of historic buildings on the wind farm site including the ruins of St. Vogues Church, a medieval stone church of regional archaeological significance.

Power from the turbines is transferred by a network of underground radial cables to the on-site substation, where it is transformed to 38kV, at which point it is exported from the site via overhead line, which connects to the Killinick 38kV substation, approximately 9.5km to the north-northwest (straight line distance). No alteration to the existing grid connection is proposed.

The surrounding area in general is characterised by low-lying good quality arable land with a substantial amount of one-off housing and tourist accommodation sites such as Carne Beach Caravan Park located 2km to the north. The surrounding area, and in particular the nearby beaches along the eastern and southern Wexford coastline are a popular tourist attraction. Rosslare Europort, located 8km north of the wind farm, is one of the busiest ports in the Country providing important links to the UK and EU.

Designated Sites

A number of designated sites (both national and EU Natura 2000 sites) are located within close proximity to the current wind farm development. Carnsore Point Special Area of Conservation (SAC) lies adjacent to the east and south of the site. Lady's Island Lake SAC, Special Protection Area (SPA) and proposed Natural Heritage Area (pNHA) is located approximately 1km west of the site. In addition, Tacumshin Lake SPA, St. Helen's Burrow pNHA and Wexford Slobs and Harbour pNHA lie within a 10km radius from the site.

Climate and Renewable Energy Policy

In March 2019, the Joint Committee on Climate Action Change published 'A Cross Party Consensus for Action' in which they encouraged the upgrading of existing onshore wind turbines where this will yield additional potential. While acknowledging that there are challenges in relation to securing additional on-shore wind generated renewable energy this report fully supports the increased provision of on-shore wind farm development at appropriate locations (such as that of the current

proposal) and acknowledges that on-shore wind has a pivotal role to play in achieving climate action targets.

The Programme for Government 2020 was published in June 2020. In relation to climate change the programme recognises that the next ten years are a critical period in addressing the climate crisis. It is an ambition of the programme to more than halve carbon emissions over the course of the decade (2020-2030). The programme notes that the government are committed to reducing greenhouse gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050. The programme also recognises the severity of the climate challenge as it clarifies that *"climate change is the single greatest threat facing humanity".*

With regards to energy the programme notes that the government will implement a new National Energy Efficiency Action Plan to reduce energy use, including behavioural and awareness aspects of energy efficiency such as building and data management. Further, the government are also committed to the rapid decarbonisation of the energy sector, along with this it is noted that the necessary steps will be taken to deliver at least 70% of renewable electricity by the year 2030.

Volume 10: Energy Strategy of The Draft Wexford County Development Plan (2021 – 2027) states that onshore wind is the main source of renewable energy in the County with 182.5MW installed capacity as of 2017. The WCC Energy Strategy also states:

> *"The Council is committed to achieving national renewable energy targets in order to transition to a low carbon economy, reduce greenhouse gas emissions and importation of fossil fuels and ensure a secure energy supply to meet the future requirement of a growing population."*

Wexford's Energy Strategy recognises the potential for the County to become a national leader in sustainable renewable energy generation and sets an ambitious target of *"100% of electricity consumption in the County to be from renewable energy sources by 2026."*

Requirement for EIA

European Union Directive 2011/92/EU (and amending Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment (the 'EIA Directive'), requires member states to ensure that a competent authority carries out an assessment of the likely significant effects of certain types of project, as listed in the Directive, prior to development consent being given for the project. Article 5 of the EIA Directive, as amended by Directive 2014/52/EU, provides that where an Environmental Impact Assessment (EIA) is required, the developer shall prepare and submit an Environmental Impact Assessment Report (EIAR).

The proposed development exceeds the relevant threshold for mandatory EIA requirement, i.e. more than 5 turbines and more than 5 MW, as described in Part 2, Class 3 (i) of Schedule 5 of the Planning & Development Regulations 2001, as amended, relating to the harnessing of wind energy. Under the requirements of Section 172 Part 1, it is therefore considered that EIA is mandatory for the proposed development.

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Scope of the Assessment

MKO will act as overall project managers, with responsibility for the preparation of the EIAR for this project. Input from a number of specialist sub-contractors will be required during the course of the project.

The purpose of the EIAR will be to document the current state of the environment and to assess what the future state would be if the existing development is decommissioned prior to August 2022, in an effort to quantify the likely significant effects, if any, of the development on the environment. The assessment process will serve to highlight any areas where mitigation measures may be necessary in order to protect the surrounding environment from any negative effects associated with the development. The objective of this process is to determine whether any significant negative effects to the environment are likely to result from the extended operation of the wind farm, and to facilitate the most efficient and positive design of any additional mitigation measures that may be necessary in order to ensure protection of the environment. As part of the assessment a "Do Nothing" alternative will be assessed under which the existing wind farm development would be decommissioned prior to August 2022.

The EIAR will assess the likely significant effects of the CWF, alone and cumulatively with other key projects, including the permitted Richfield, Richfield 2, Ballywater and Ballywater 2 wind farms as well as other types of projects and land uses.

The information to be contained in an EIAR is specified in Schedule 6 of the Planning and Development Regulations, 2001 and in the updated EIA Directive 2014/52/EU. The EIAR for the proposed development will use the grouped structure method to describe the existing environment, the likely significant effects of the development thereon and the proposed mitigation measures, under the headings as per Table 2.

Table 2 EIAR Proposed Topics and Roles

Ref	EIAR Sections	Author
1	Population & Human Health (including Shadow Flicker)	MKO
2	Biodiversity (Flora and Fauna)	RSK Ireland, Redwood House, 66 Newforge Ln, Belfast BT9 5NF.
3	Ornithology	Scott Cawley Ltd., College House, 71-73 Rock Rd, Blackrock, Co. Dublin A94 F9X9.
4	Land, Soils and Geology	MKO
5	Water (Hydrology and Hydrogeology)	MKO
6	Air and Climate	MKO
7	Noise and Vibration	Amplitude Acoustics, G2 The Steelworks, Foley St, Dublin D01 KP03.
8	Archaeological, Architectural and Cultural Heritage	MKO

9	Material Assets (includes Traffic and Transportation, Telecommunications, Aviation and Electromagnetic Interference)	MKO
10	Interaction of the Foregoing.	MKO
11	Background Planning Policy	MKO
12	Alternatives	MKO
13	Landscape and Visual Impact	MKO

Background information relating to the development, scoping and consultation undertaken and a description of the development will be presented in separate sections of the EIAR.

The EIAR will comply with the EIA Directive as amended by Directive 2014/52/EU. Industry-wide, best practice methodologies and standards will be used in preparation of the EIAR. The likely significant effects of the proposed development will be described using standard, best-practice terminology. In consultation with the project design team, appropriate mitigation measures will be proposed in the EIAR to reduce, remedy or eliminate any likely negative effects identified.

The EIAR will also include a Non-Technical Summary (NTS), which is a condensed and easily comprehensible version of the EIAR document. The NTS will be a concise statement of the significant findings and recommended actions presented in the EIAR.

Appropriate Assessment/Natura Impact Assessment

The proposed development will be subject to the Article 6(3) Appropriate Assessment (AA) process. An AA Screening Report (AASR) and a Natura Impact Statement (NIS), if required, will be prepared in accordance with the European Commission guidance document Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and the Department of the Environment's Guidance on the Appropriate Assessment of Plans and Projects in Ireland (December 2009, amended February 2010).

This assessment will be carried out in tandem with the EIAR of the proposed development. The AASR and NIS, if required, will be submitted to the Planning Authority as stand-alone documents as part of the planning application.

Conclusion

As part of the EIA process, we would welcome any comments that you might have in relation to the proposed project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

If you could return any comments or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Yours sincerely,

Eoin Hurst BE MSc DIC MIEI, Project Environmental Engineer

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