

SUBMISSION OF DRAFT/DIRECTED ORDER

01.24.439

RD,

Draft/~~Directed~~ Order giving effect to ~~recommendation/direction~~ to ~~grant/refuse/use~~ ~~S139/dismiss/split decision~~ is attached for consideration.

SECRETARIAT

Enter decision code:

4	1
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Split Decision:

✓

Residential Developments (grant of permission only)

Enter No. of Units Apts

--

Floor Area

--

sq.m

Houses

--

Floor Area

--

sq.m

Total Development Area (floor area)

--

sq.m

Please issue notification as follows:

P.A.: (BP100n/BP100an/BP100an/103n/special letter):

Clark Co Co

Appellant(s)/Agent(s): (BP100n/100an/100an/101n/103n/1031n/10312n/102n/special letter):

Clb Noonon Linehan Carrall

Applicant(s)/Agent: (BP 100n/101n/103n/102n/BP100n/BP103n/special letter):

Hol Co Kehily Timoney + Co

Observers and others: (BP 104n/100n/special letter):

Public Representatives: (BP 104n/100n/special letter):

Comments:

Drafted:

02002

Date:

27.05.15

Typing & Letters Checked:

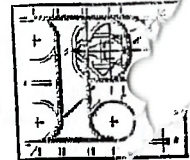
02002

Date:

27.05.15

Cleared S.E.O./S.A.O.:

Date:



Inspector's Report Discharge Form

File No: PL04.244439.

(6) Habitats Directive

Is the integrity of a European site likely to be negatively affected?

Yes ☐ No ☒

Has AA, or screening for AA, previously been carried out by the EPA, and if so, has regard been had to this?

Yes ☐ No ☐ N/A ☒

(7) EIA Development (including sub-threshold)

Does this application relate to an activity for which an IPPC or Waste Licence (or review of a Licence) is required from the EPA?

Yes ☐ No ☒

If an EIS was submitted, was the EPA notified and observations sought/received?

Yes ☐ No ☐ N/A ☒

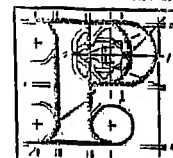
In the case of sub-threshold development where the submission of an EIS has not been sought, has the EPA been notified of this view and observations sought/received?

Yes ☐ No ☐ N/A ☒

INSPECTOR A. Cassidy

Date 19/5/15

Inspector's Report Discharge Form

e No: PL04. 244439

Please complete all relevant sections – (whether recommendation is to grant or to refuse)

(1) New Issues Yes ☐ No ☒

If 'Yes', provide brief description:

(2) Residential Development

(i) Number of dwellings: _____ as per my recommendation (enter...none...if refusal)

No. of Apts: _____ No. of Houses: _____ Total No. of Units: 44

(ii) Part V, Social and Affordable Housing

Section 96, Part V condition applies: Yes ☐ No ☒

(3) Development Contributions (s. 48, s. 48(2) (c) and s.49)

Section 48 Development Contribution Scheme condition applies:

Yes ☐ No ☒

Section 48 (2) (c) Special Development Contribution condition applies:

Yes ☐ No ☒

Section 49 Supplementary Development Contribution Scheme condition applies:

Yes ☐ No ☒

(4) Material Contravention of Development Plan

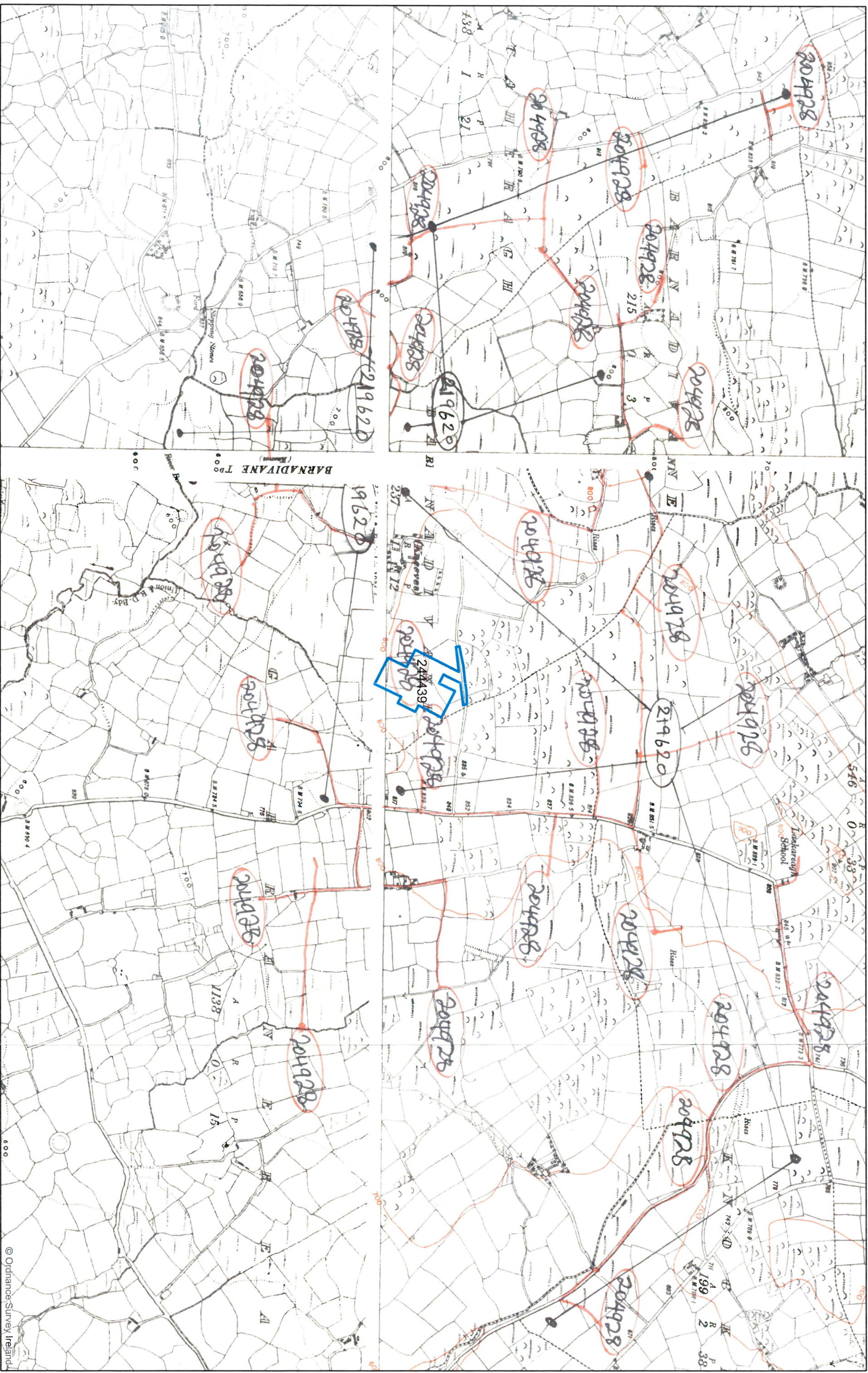
Section 37(2)(b) provisions apply:

Yes ☐ No ☒

(5) Statutory Notices (e.g. s.131/s.132)

Have all statutory notice periods expired?
If 'No', the file should not be discharged.Yes ☒ No ☐

PTO



Cork CDP
2014

9.2 Renewable Energy

Background

- 9.2.1 Renewable energy can be defined as energy developed from sources that are constantly replenished through the cycles of nature and, unlike fossil fuels, are not finite.
- 9.2.2 The development of renewable energy sources is central to overall energy policy in Ireland. Renewable energy reduces dependence on fossil fuels, improves security of supply, and reduces greenhouse gas emissions, protecting against climate change while delivering new jobs to the economy.
- 9.2.3 This Plan aims to support the sustainable development of renewable energy sources.
- 9.2.4 In order to highlight the benefits of a move towards reduced greenhouse gas emissions the Council will require all renewable energy developments to indicate clearly the overall net carbon benefit arising from their proposed developments.
- 9.2.5 Through the delivery of a low carbon energy framework, the County Council aims to attract inward investment to the County and the wider South-West Region. County Cork is well positioned to become self-sufficient in renewable energy.
- 9.2.6 Ireland's National Renewable Energy Action Plan (NREAP), 2010, sets out the contribution envisaged from renewable energy in each of the three sectors - electricity, heating and transport with the electricity sector playing the most significant role. The target is that 16% of the national gross final consumption of energy should be from renewable sources by 2020. The Government plans that by 2020 this overall target will be delivered by approximately:
- 40% consumption from renewable sources in the electricity sector,
 - 12% of energy consumption in the heat sector from renewables and
 - 10% of transport energy from renewables.

9.2.7 It is important therefore that Cork County sets out its ambitions with regard to renewable energy in this context and shows its ability to help contribute to achieving these national targets. This would build on successes to date in the provision of renewable energy from hydro power and onshore wind energy generation.

9.2.8 Wind (onshore and offshore), hydro and solar photovoltaic are used to generate electricity, wave and tidal have potential to do so in the future. Geothermal and biomass (Anaerobic Digestion AD) can be harnessed to contribute to both heat and electricity. Thermal solar energy is generally used for water and space-heating. Biomass is particularly useful for the heat sector and can also be used to generate electricity. Biofuels and biodiesel can contribute to the transport sector.

9.3 On-Shore Wind Energy

Background

- 9.3.1 This section of the Plan sets out a plan led approach to on-shore wind energy development in County Cork and identifies suitable areas for sustainable wind energy development.
- 9.3.2 The current County Development Plan Wind Energy Policy has been largely unchanged since its inception in 2001. Since then two important documents have been published; The Wind Atlas of Ireland, 2003 and The Wind Energy Guidelines, 2006 (DoECLG) both of which form the basis of this Wind Energy Policy. Therefore, a review of the previous policy was considered appropriate.
- 9.3.3 The Wind Energy Guidelines 2006 are the current statement of government policy on on-shore wind energy. They aim to offer advice to Planning Authorities on planning for wind energy through the Development Plan process and in determining planning applications.
- 9.3.4 The guidelines set out a step-by-step approach to ensure that all the relevant considerations can be given an appropriate weight in the formulation of a policy that should identify the following areas:

- Areas of strategic importance for wind energy development;
- Areas where wind energy projects are not normally encouraged; and
- Areas where wind energy projects can be considered and assessed in relation to relevant criteria.

County Development Plan Objective

ED 3-1: National Wind Energy Guidelines

Development of on-shore wind shall be designed and developed in line with the 'Planning Guidelines for Wind Farm Development 2006' issued by DoELG and any updates of these guidelines.

County Development Plan Objective

ED 3-2: Wind Energy Projects

On-shore wind energy projects should focus on areas considered 'Acceptable in Principle' and Areas 'Open to Consideration' and generally avoid "Normally Discouraged" areas in this Plan.

County Development Plan Objective

ED 3-3: Wind Energy Generation

Support a plan led approach to wind energy development in County Cork and identify areas for wind energy development. The aim in identifying these areas is to ensure that there are no significant environmental constraints, which could be foreseen to arise in advance of the planning process.

Wind Energy Development in County Cork

9.3.5 County Cork has the largest wind energy capacity in the Country at present with 283MW from 20 wind farms which is approximately 13.8% of Ireland's overall wind energy production.

9.3.6 The wind farms are currently concentrated in three main locations in the county; south of Millstreet in the Derrynasaggart Mountains; east of Millstreet in the Boggeragh Mountains and South of Dunmanway.

9.3.7 There is considerable potential for additional wind energy capacity if all the granted and pending wind farm developments are constructed. See Table 9.1.

Table 9.1 Onshore Wind Energy Planning Applications in County Cork

Application Status	No. of Wind Farm Applications	Total Power /Capacity MW
Commissioned	19	283MW
Granted	23	308MW
Pending	10*	143MW
Total	52	720MW
* These pending applications are now granted		



Methodology

- 9.3.8 Using the guidance provided in the “Planning for Wind Energy Development Guidelines 2006” and the SEAI Manual ‘A Methodology for Local Authority Renewable Energy Strategies’ April 2013’ the Council in a step by step approach identified the key policy considerations which would inform the development of a new wind energy strategy. This approach is set out in detail in the ‘Energy’ Background Paper Nov 2012 and “Planning for Cork County’s Future”, Section 11 Consultation Document, January 2013.

Key Policy Considerations

- 9.3.9 A number of key policy considerations were identified and taken into account in the development of the Wind Energy Strategy Map (Figure 9.3) and associated objectives. These considerations were:
- The approach taken by other adjoining Local Authorities (Kerry, Limerick, South Tipperary and Waterford) to Wind Energy in their respective County Development Plans. Of particular importance are the instances where adjoining Counties have adopted a policy discouraging wind energy projects.
 - The location of all existing and proposed wind energy developments and their cumulative impacts.
 - The pattern of population distribution, so that the main centres of population can be avoided.
 - Accessibility to the electricity distribution grid.
 - Important or high value landscapes.
 - Nature conservations sites and in particular Natura 2000 sites (SPA and SAC).
 - The Water Framework Directive and River Basin Management Plans for the County, so that impacts on the rivers, lakes and other water-bodies of the County could be avoided.
 - The Sustainable Energy Ireland (SEI) Wind Atlas, 2003 was utilised to identify areas with viable wind speeds.

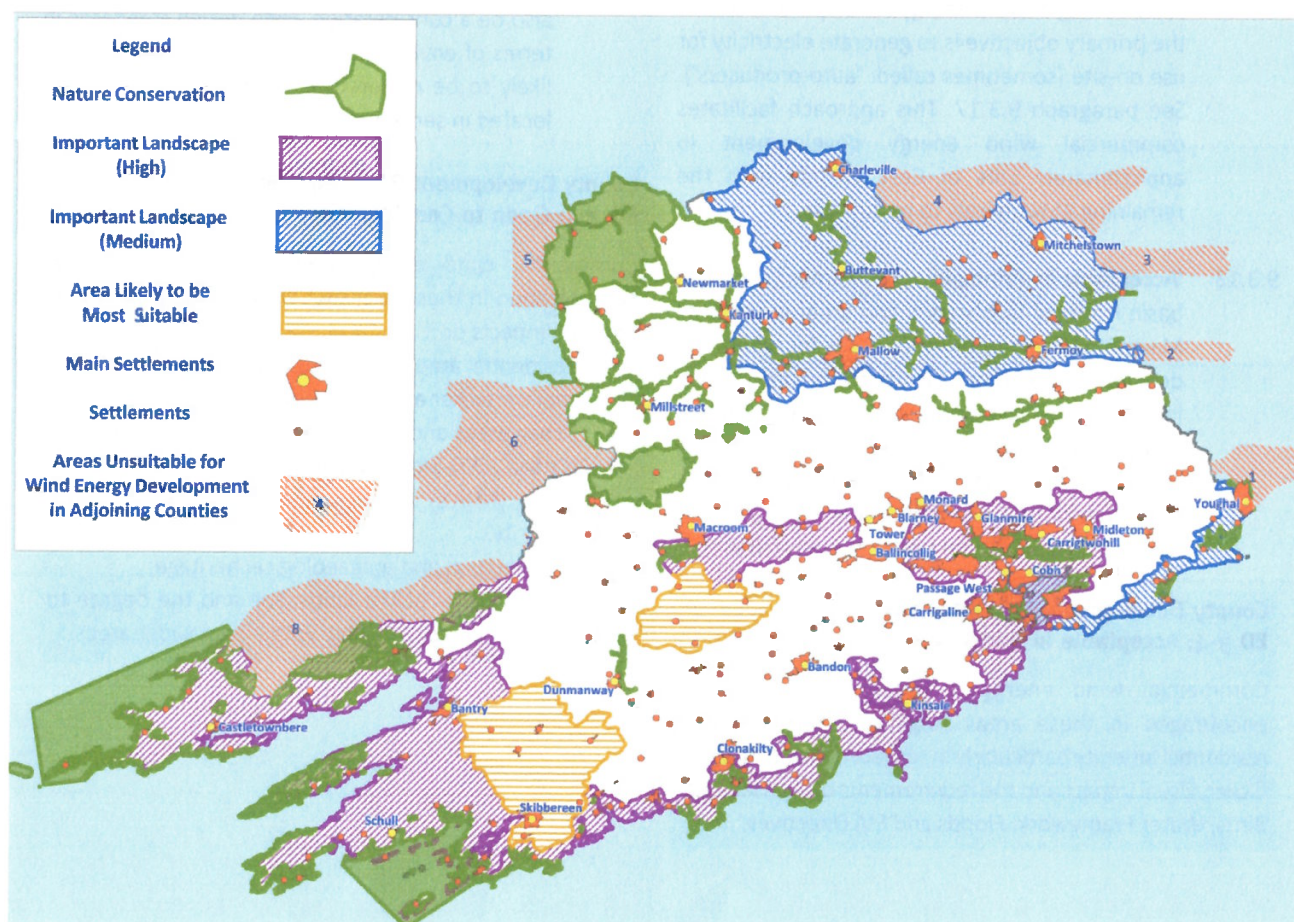


Figure 9.2 Policy Considerations for Wind Energy Projects

Wind Deployment Areas

9.3.10 The on-shore wind energy strategy set out in this plan has been prepared taking account of the key policy considerations. It identifies three categories of 'Wind Deployment Area' for large scale commercial wind energy developments See Figure 9.3 Wind Energy Strategy Map.

9.3.11 These are as follows:

- "Acceptable in Principle",
- "Open to Consideration"; and
- "Normally Discouraged".

9.3.12 In this plan, commercial wind energy developments are those wind energy developments where the primary purpose is to generate electricity for connection to the grid irrespective of their scale. Other policies apply to the planning of wind energy developments where the primary objective is to generate electricity for use on-site (sometimes called: 'auto-producers'). See paragraph 9.3.17. This approach facilitates commercial wind energy development in approximately 55% of Cork County with the remaining 45% unlikely to be suitable.

9.3.13 **'Acceptable in Principle'**: These areas (River Ilan basin north of Skibbereen and an area south of Macroom) are in optimal locations for wind farm development without significant environmental impacts. They have viable wind speeds (>7.5m/s) and good proximity and access to the grid. These areas exclude urban areas and town green belts, avoid Natura 2000 Sites (SPA and SACs), high value landscapes and Natural Heritage Areas (NHA's).

County Development Plan Objective ED 34: Acceptable In Principle

Commercial wind energy development is normally encouraged in these areas subject to protection of residential amenity particularly in respect of noise, shadow flicker, visual impact and the requirements of the Habitats, Birds, Water Framework, Floods and EIA Directives.'

9.3.14 **'Open to Consideration'**: This area comprises almost 50% of the County area. Within these areas there are locations that may have potential for wind farm developments but there are also some environmental issues to be considered. This area has variable wind speeds and some access to the grid. Urban areas, metropolitan/town green belts, and Natural Heritage Areas (NHA's) within this area are not generally considered suitable for wind farm developments. The area excludes Natura 2000 sites. Any proposals within Freshwater Pearl Mussel Sub Basin Catchments or in other sensitive catchments must be able to demonstrate that they have been designed in a manner which prevents any risk of peat slippage or erosion; and ensures the ongoing protection of water quality and the maintenance of natural hydrological processes. The cumulative effect of wind energy developments with regard to landscape and visual impacts and also impacts on Natura 2000 sites will also be a consideration. High design standards in terms of environmental protection measures are likely to be required to be included in projects located in sensitive catchments.

County Development Plan Objective ED 35: Open to Consideration

Commercial wind energy development is open to consideration in these areas where proposals can avoid adverse impacts on:

- Residential amenity particularly in respect of noise, shadow flicker and visual impact;
- Urban areas and Metropolitan/Town Green Belts;
- Natura 2000 Sites (SPA and SAC), Natural Heritage Areas (NHA's) or adjoining areas affecting their integrity.
- Architectural and archaeological heritage;
- Visual quality of the landscape and the degree to which impacts are highly visible over wider areas.

- 9.3.15 **“Normally Discouraged”:** These areas (coastal areas, some areas in North Cork, Cork Harbour and the Lee Valley) are normally not suitable for commercial wind farm developments due to their overall sensitivity arising from ecological, landscape, amenity, recreational and settlement, considerations.

County Development Plan Objective ED 3-6: Normally Discouraged

Commercial wind energy developments will be discouraged in these areas which are considered to be sensitive to adverse impacts associated with this form of development (either individually or in combination with other developments). Only in exceptional circumstances where it is clear that adverse impacts do not arise will proposals be considered.

- 9.3.16 The area shown as “Normally Discouraged” on Figure 9.3 includes provision for a buffer of 800m around coastal and inland wetland SPAs (Ballymacoda Bay, Cork Harbour, Clonakilty Bay, the Gearagh SPAs) and 500m around upland SPAs (Stack’s to Mullaghareirks, West Limerick Hills and Mount Eagle Bog SPA and Mullaghanish to Mushermore Mountain SPA).

Other Wind Energy Developments

- 9.3.17 Proposals for the generation and consumption of electricity in a single premises will be considered on their merits in all areas of the County including the Strategic Employment Areas around Cork Harbour.
- 9.3.18 Many small scale renewable energy generation installations for domestic, agricultural and some industrial activities are generally ‘exempted development’ and may not require planning permission. However in some circumstances particularly where proposals are located within or on a site or feature of ‘heritage or environmental’ value such proposals will be de exempted and will therefore require planning permission. (See Planning and Development Regulations 2001-2012). Further information on these exempted developments is available by contacting Cork County Council or the Department of Environment, Community and Local Government.

County Development Plan Objective ED 3-7: Other Wind Energy Development

The Council will consider proposals where it can be shown that significant impacts on;

- Residential amenity particularly in respect of noise, shadow flicker and visual impact;
- Urban areas and Metropolitan/Town Green Belts;
- Sites designated for nature conservation, protected species and habitats of conservation value;
- Architectural and archaeological heritage and;
- Visual quality of the landscape and the degree to which impacts are highly visible over wider areas can be avoided.

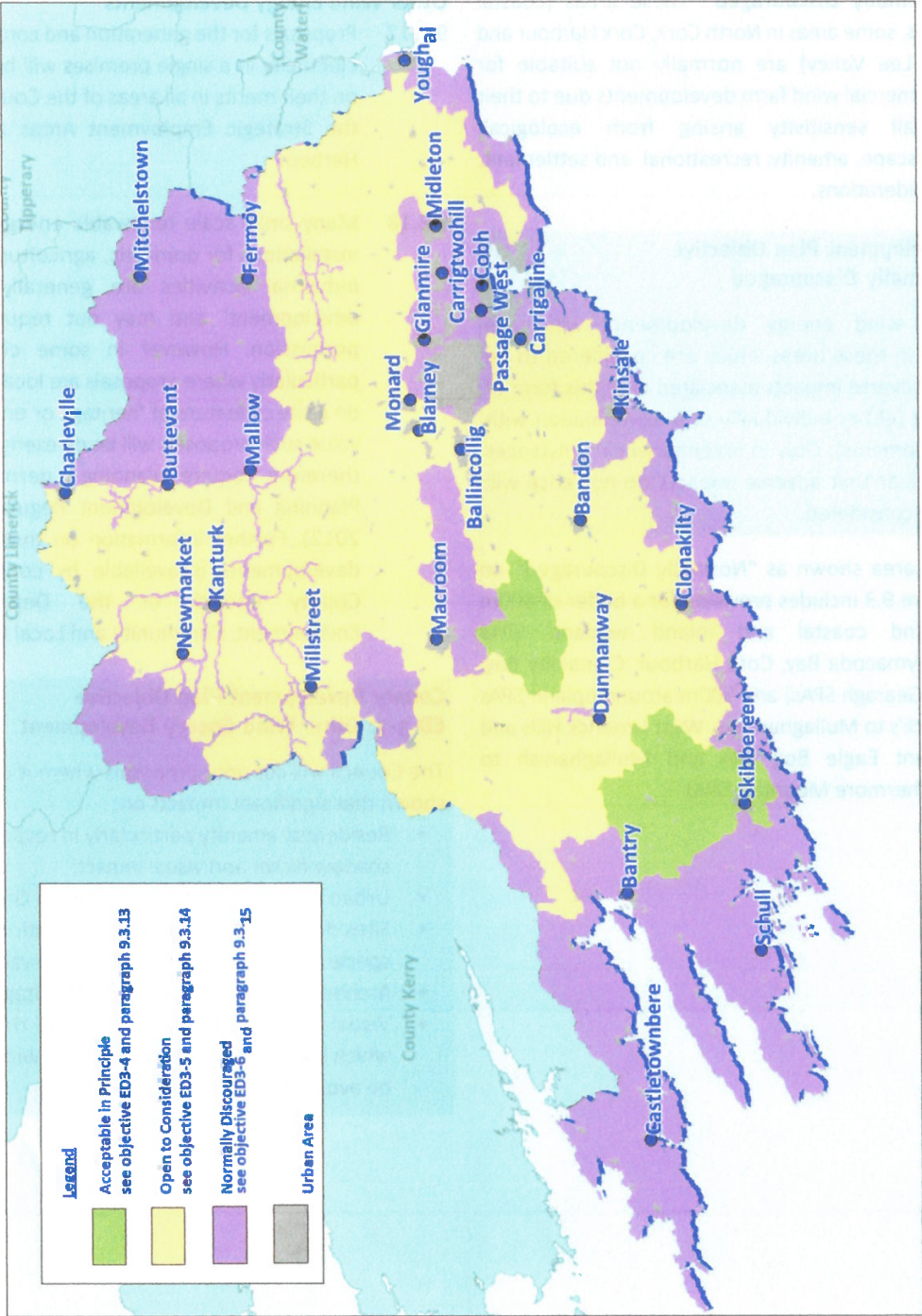


Figure 9.3 Wind Energy Strategy Map (includes SACs and buffers around SACs and SPAs)

any initial economic or market factors, sample zones of theoretical visibility, etc.

It is strongly recommended that the planning authority consult with the Development Applications Unit of Department of the Environment, Heritage and Local Government at the earliest planning and design stages in relation to wind energy developments that may have a potential impact on the built and natural heritage. Good research and wide consultation by all parties at the site selection stage can avoid unnecessary time delays and expense in considering unsuitable sites.

4.2 Wind Measuring Masts

Planning applications for wind anemometers and measuring masts are generally sought for a limited period only. Permissions should be granted for approximately a two-year period, in consultation with the developer, to allow a wind resource analysis to be carried out. It would be inadvisable for the planning authority to grant planning permission for a wind measuring mast in an area where there is a presumption against wind energy development in the development plan. In a case where a developer wishes to extend the period of the permission an application must be made to the planning authority to retain the wind measuring mast; otherwise the developer should be required to remove it.

4.3 Access to the Electricity Grid

In addition to consultation with planning authorities and statutory bodies, wind energy developers should consult with the relevant electricity transmission or distribution grid operators who have responsibility for access to the local grid system in relation to the nature and location of proposed grid connections.

Where the works required to connect the wind energy development to the local electricity transmission/distribution network are not exempt, it will be necessary to submit a planning application to the planning authority. Best practice would suggest that an integrated planning application that combines grid interconnection information together with details of the wind energy development

should be submitted to the planning authority. However, if this is not possible, then the planning authority should agree in advance with the developer the information on the grid connection that they consider necessary to enable them to fully assess a planning application for the wind energy project, and which the developer is in a position to furnish.

Detail of indicative and feasible options for grid interconnection lines and facilities should in general be adequate for a planning authority to consider a wind energy application as the precise capacity required for connection will not be known until planning permission is obtained. Suggested content for these indicative and feasible options include (a) the general direction of connection, (b) connecting line capacity (e.g. 38 kV, 110 kV) and (c) line supporting structure (e.g. single pole, twin pole, lattice tower).

The planning authority should note that it may not be possible, due to reasons outside the applicant's control, to provide information on indicative grid connections at the pre-planning consultation or planning application stage of the wind energy development.

It is therefore inappropriate for the planning authority or An Bord Pleanála on appeal to attach conditions to planning permissions for wind energy developments in regard to the location of the connection to the grid. In these instances, a separate application for the grid connection will be necessary.

However, where such information is available and is submitted as part of a planning application, it would be appropriate, if considered necessary, to attach conditions in regard to the grid connection.

In order to minimize project development risks and to ensure appropriate grid infrastructure which takes account of potential impact on the built or natural heritage, wind energy developers and electricity companies should consult with the planning authority and with the Development Applications Unit of the Department of Environment, Heritage and Local Government in regard to the submission of a separate application for a grid connection.

- Where possible, after construction is completed, vegetation should be reinstated on banks and margins of roads that are constructed to accommodate the passage of construction machinery and trucks. This is especially critical where cut and fill has been required.

6.11 Landscape Impacts of Associated Development

The elements associated with wind energy developments other than turbines include the roads and tracks, power poles and lines, the control building, the wind measuring mast and the compound. Individually and collectively, these elements should be considered, located and designed to respect the character of surrounding landscape.

6.11.1 Control Building and Substation Compound

- A high standard of design should be applied to all structures associated with the substation, and should not only take account of its function but also of its aesthetic quality, in order to minimise any sense of intrusion.
- The development should incorporate colour harmony and adequate screening of the control building and substation compound. Should the surrounding landscape include trees and/or shrubs, such material can be used for screening. In sensitive landscapes, consideration should be given to screening the control buildings and compound by earth berms as well as re-sodding with local vegetation in order to mitigate their visual impact.
- The control building, where practicable, should be located in a dip or a hollow but away from ecologically sensitive areas or features. In the case of coastal locations it should not be located on promontories, unless comprising a special design appropriate to the setting.
- Control buildings should be designed to respect the character of buildings typically found in the surrounding landscape.

- Urban/industrial contexts could also accommodate building design, which corresponds more specifically to the contiguous building(s).

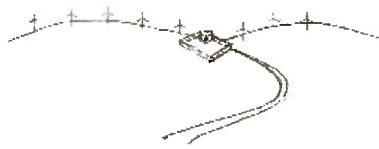


Fig 28: Visually exposed control building and angular compound draw attention to the wind energy development while creating visual disharmony.

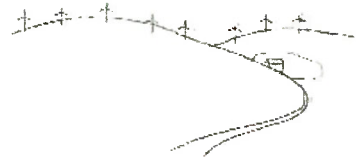
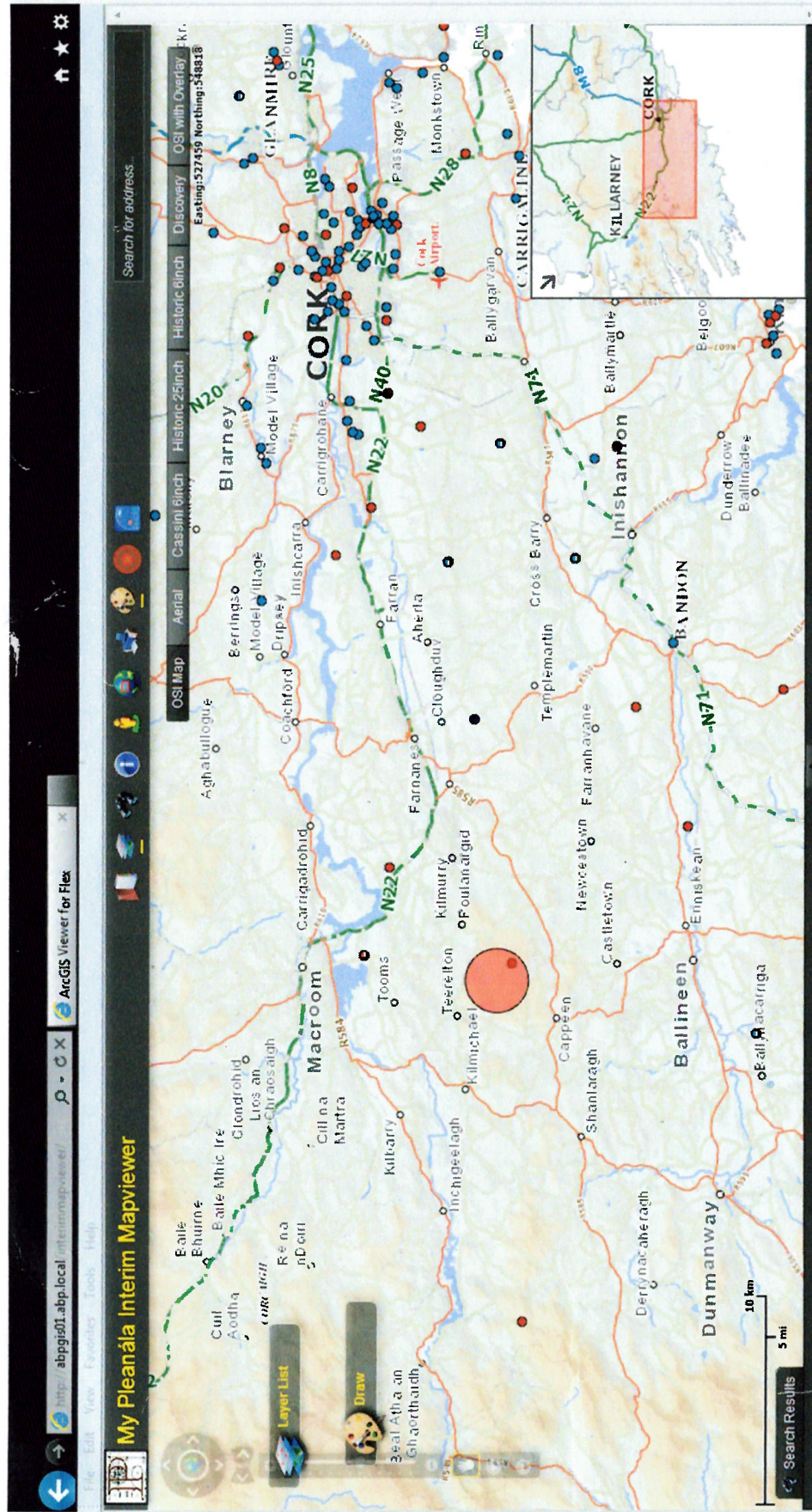


Fig 29: Screened/partially screened control building and rounded shape of compound is more sympathetic to the landscape.

6.11.2 Fencing

- Fencing should be limited to the substation compound area.
- Chain link is preferred over palisade fencing as it is more transparent.
- Fencing should not encompass the entire wind energy development, as this would unnecessarily compromise access to the countryside as well as the sense of simplicity intrinsic to the aesthetic quality of turbines. Extensive areas of fenced ground would also limit grazing which could result in variations in the colour of vegetation.
- Temporary fencing (e.g., electric fencing) may be required to keep grazing animals off bare soils while vegetation cover re-establishes or scraghs root in.
- Consideration should be given on Mountain Moorland hilltops to creating a curvilinear shape for the compound as defined by fencing, as the more conventional rectilinear shape may jar with the openness and sense of the open natural setting.

Site Location Map.



6 7 8 9 10

Key map

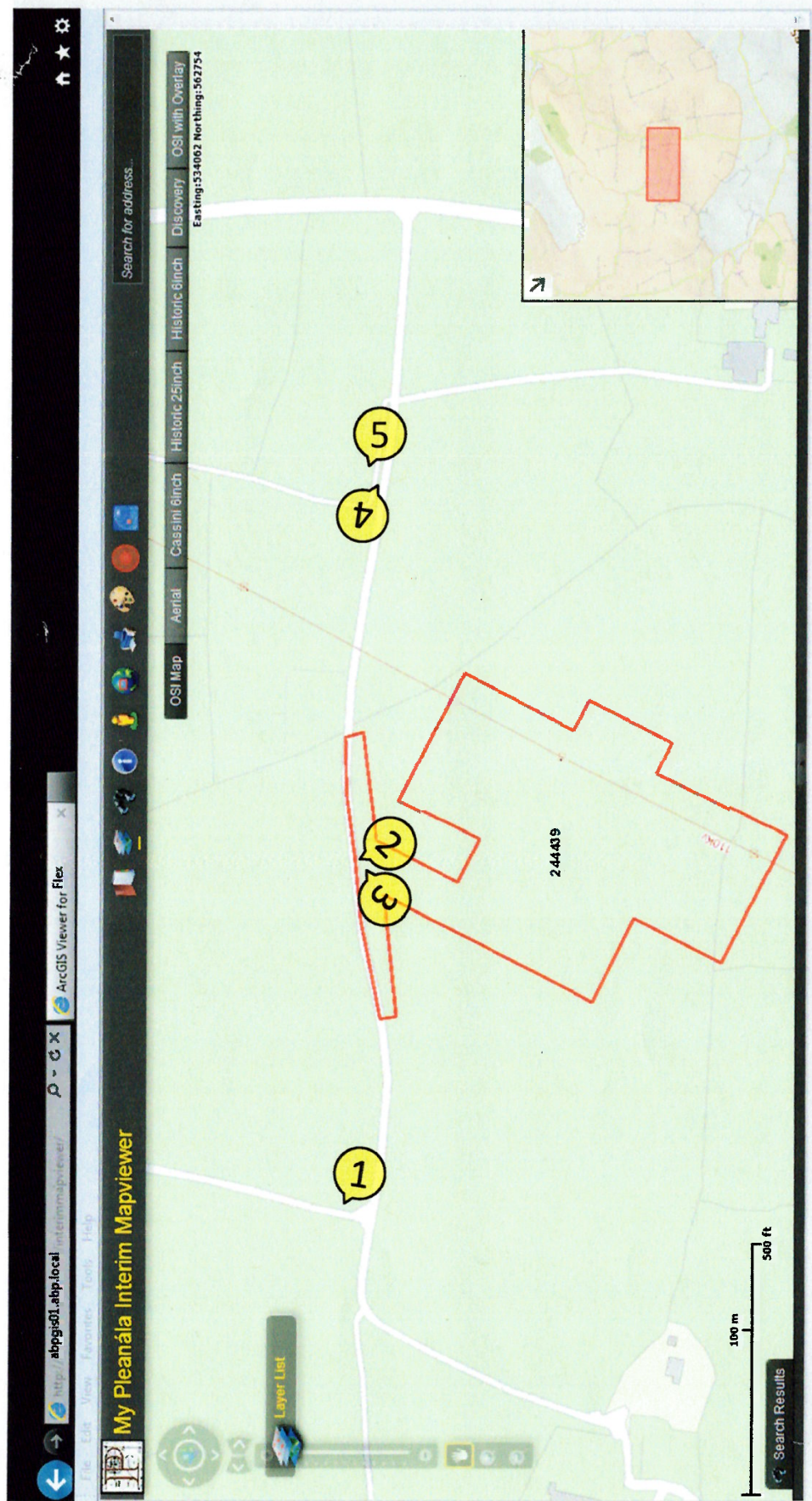


Photo 1: View towards site from west looking east

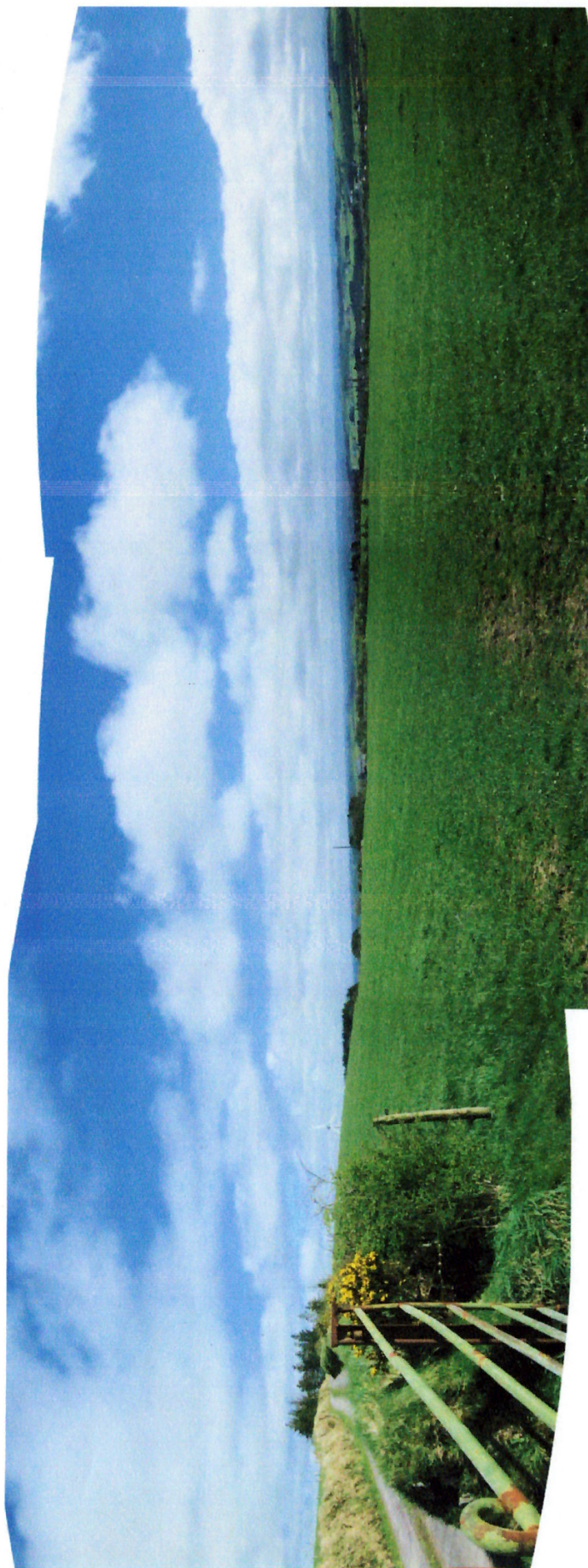


Photo 2; View into site from entrance looking east / south



Photo 3: View into site from entrance looking south / west



Photo 4: Access road to site looking west



Photo 5: Access road to site looking east towards main road



9 10



Key map

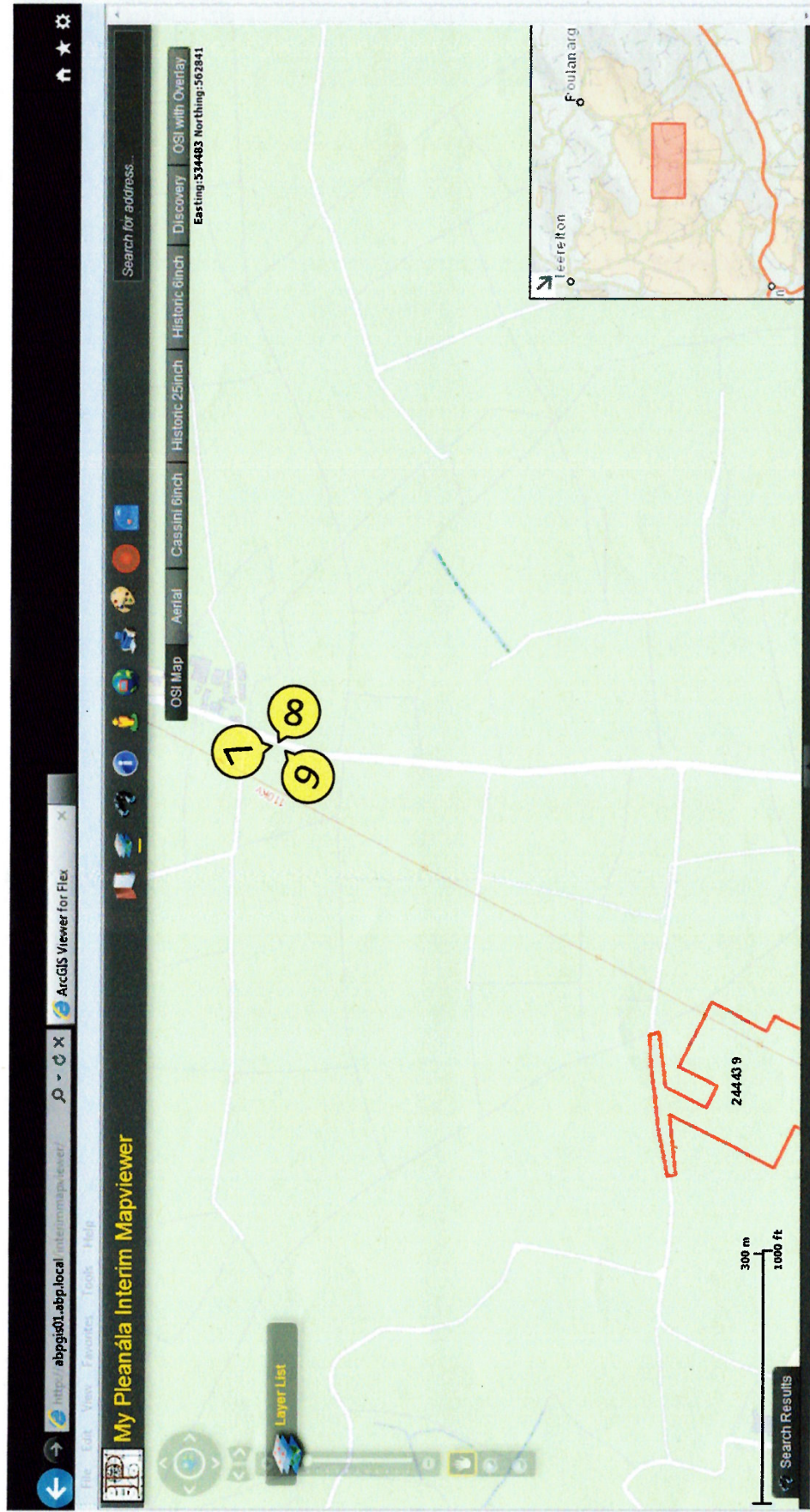


Photo 6: View of permitted location for substation under PL04.219620 looking south / west

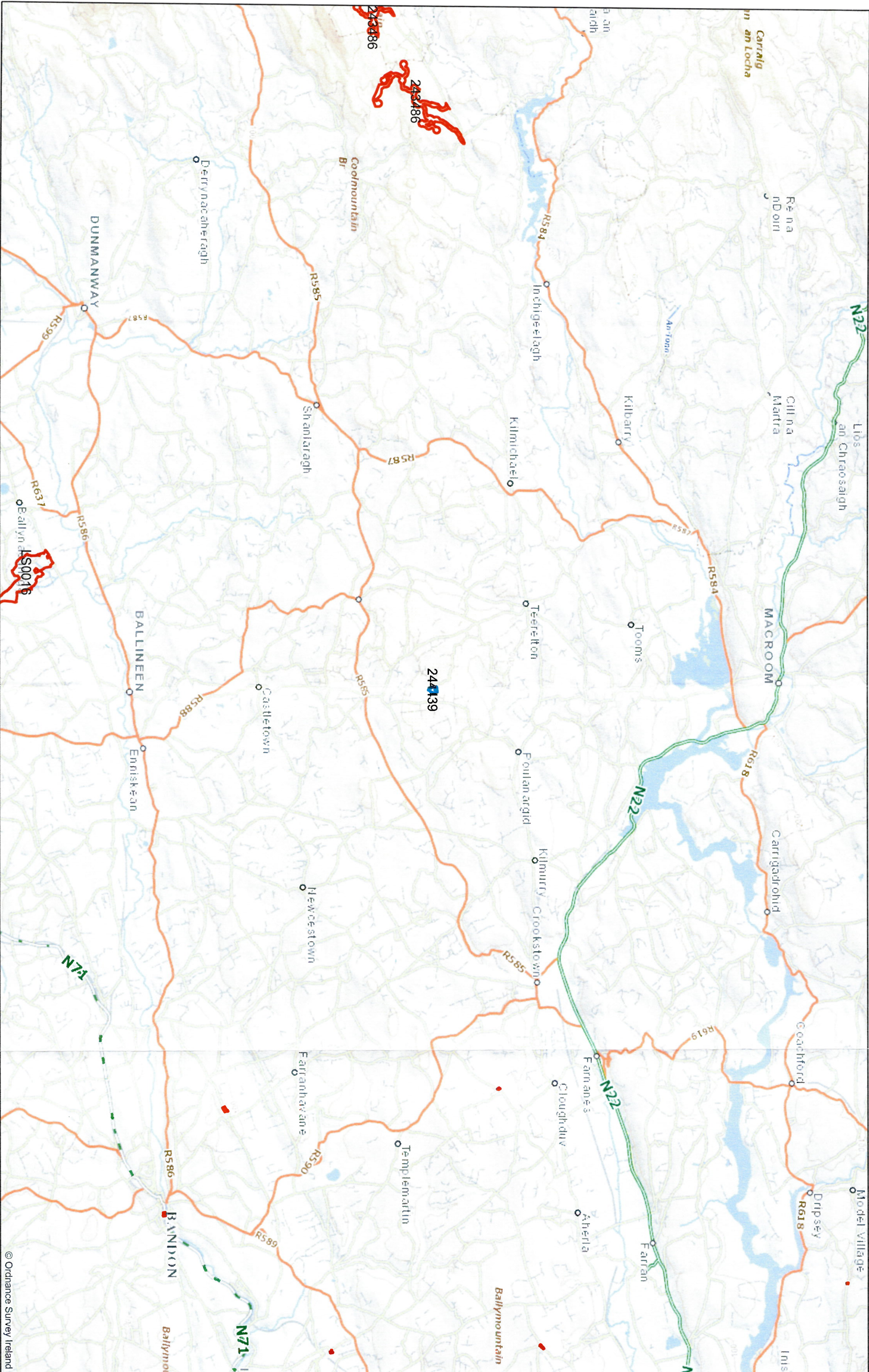


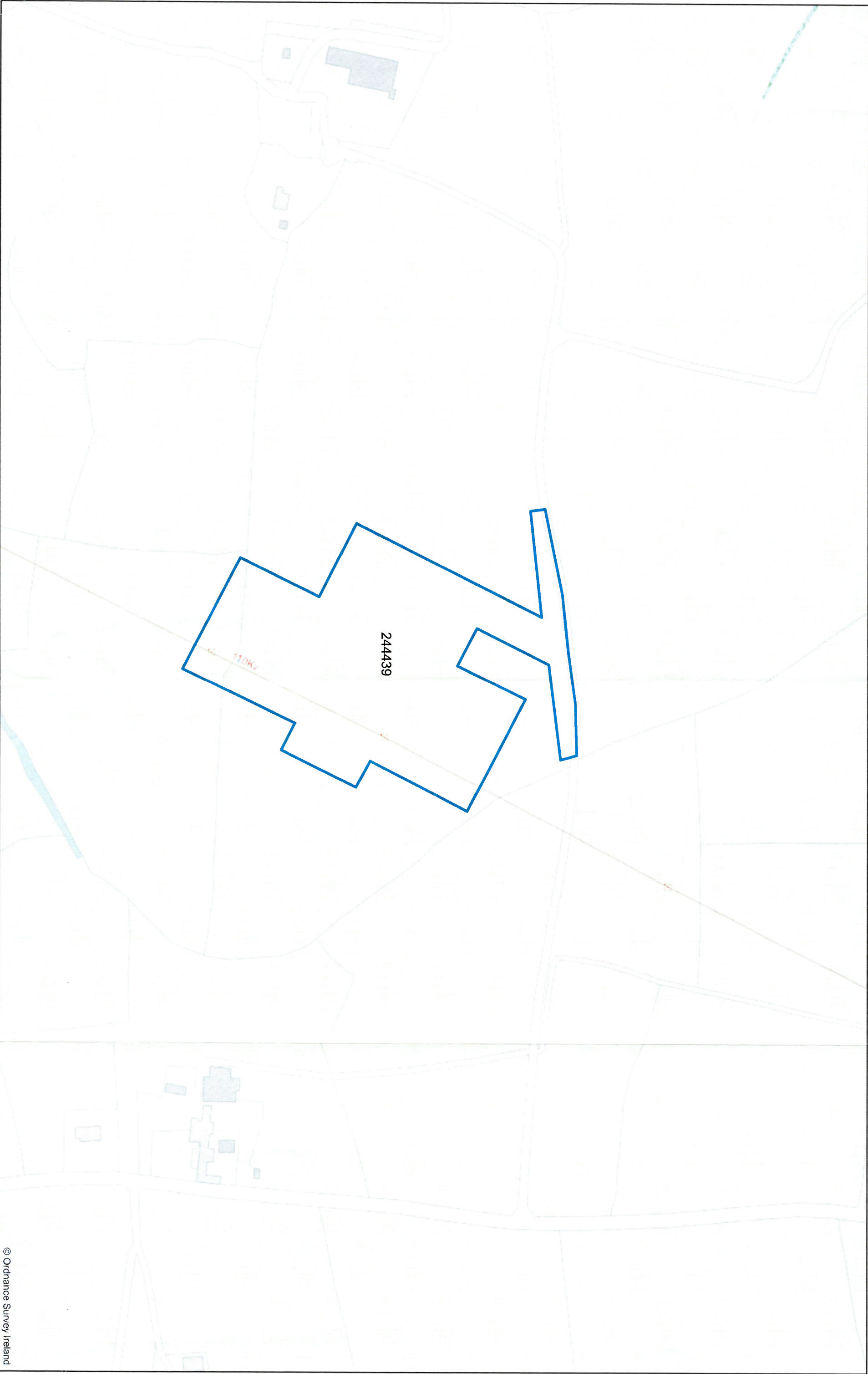
Photo 7: View of permitted location for substation under PL04.219620 looking west / north



Photo 8: View of existing windfarm in area







Barna Wind Energy (BWE) Ltd.
C/O Fehilly Timoney & Co.
Core House
Pouladuff Road
Cork

BY REGISTERED POST

20/02/2015

Re: **14/06760**

The construction of six wind turbines, with a maximum tip height of up to 131 m and associated turbine foundations and hardstanding areas, 1 no. permanent meteorological mast up to 90m in height, upgrade of existing and provision of new site tracks and associated drainage, new access junction and improvements to public road to facilitate turbine delivery, 1 no. borrow pit, underground electrical and communications cables, permanent signage and other associated ancillary infrastructure. This application is intended to replace the development already granted permission under PL04219620 (05/5907) and subsequently extended under 11/6605. This application is seeking a 10-year planning permission. An Environmental Impact Statement and AA Screening Report have been prepared in respect of the planning application.
At: Lackareagh and Garranereagh, Lissarda and Barnadivane (Kneevies) Teerelton, Co Cork,

Dear Sir/Madam,

I refer to your planning application which was lodged with the Planning Authority on the 19/12/2014.

It is considered that the information submitted with the application is not yet sufficient to enable the Planning Authority to make a decision in this case. Therefore, to enable the Planning Authority give further consideration to your application, you are requested to submit **six copies** of the following further information:-

It is considered that the information submitted with this application is not sufficient to enable the Planning Authority to make a decision in this case. Therefore to enable the Planning Authority to give further consideration to your application, please submit the following;

General

1. Submit a revised site layout plan which clearly (in a different colour) outlines the location of the previously permitted 14 no. turbines in the context of the location of the proposed 6 no. turbines.
2. Please submit a larger, more detailed map at A1 scale clearly showing the location of **ALL** existing dwellings (both inhabited/uninhabited) in the vicinity of the site (within 1km). The location of existing roads should be clearly visible.

Zones of Theoretical Visibility (ZTV's)

3. The ZTV's submitted have been overlaid on 1:80,000 Series map. As detailed in the wind energy guidelines 2006 the ZTV's should be overlaid on the 1:50,000 series Ordnance Survey maps and printed at a larger scale to ensure that locations theoretically exposed to viewing can be easily identified. The Guidelines also outline that the scale of the maps should be such that the underlying information such as place names and roads are clearly legible. The ZTV's should be revised to address this.
4. The ZTV's should be revised to detail all scenic routes and all relevant landscape designations and types, as outlined in the 2014 CDP.
5. The ZTV for cumulative assessments should be revised to clearly detail adjacent and neighbouring windfarms and turbine locations along with the proposed development.
6. The ZTV should detail appropriate legends and colour coding, particularly for visibility '1 to 2'.
7. The ZTV submitted are limited to a 20km extent. This should be extended to 25km where there are landscapes of national or international renown, in accordance with the guidelines as outlined in the 2006 Wind Energy Development Guidelines (DOEHLG). Applicant should clarify if there are landscapes of national or international renown and revise as applicable.

Photomontages

8. Applicant should clarify if the PM's have been prepared in accordance with relevant preparation criteria as outlined in the WEG 2006. Camera focal lengths used should be outlined and View distances should be clearly stated.
9. The location of viewpoint 12 should be clarified. Viewpoint 12 appears to be missing from the photomontages and two images are submitted for viewpoint 11.
10. Panoramic viewpoints should be enlarged.
11. It is noted that a number of the photomontage's detail overcast weather. The PM's should also be revised to detail clear weather (blue sky) conditions throughout, in order to fully assess the maximum visual impact of the proposed, existing and permitted developments.

12. The proposed and existing individual turbines at this site location should be numbered on wireframes to allow for ease of reference.

Turbine Infrastructure and dimensions

13. Clarify the proposed MW output for the Turbines, individually and in total.
14. The turbine drawings should be revised to include measurements of blades, hub height, and blade tip.

Grid connection

15. The content of the third party submissions raises a number of issues and in particular it is noted that reference is made to a recent judicial review proceedings in *O'Grianna v An Bord Pleanala*. In this regard, you are advised to outline your views on the matter having considered the submissions and considered whether projectsplitting has occurred.

Wind take

16. Having regard to Section 5.13 of the Wind Development Planning Guidelines, a layout plan detailing the proposed development along with the location of adjacent wind farm turbines should be outlined.
17. The applicant should also clearly outline on a map the distance in metres between the proposed turbines to existing turbines on the Garranereagh site.
18. The applicant should outline if the proposed development will have any impact on the optimal performance of adjacent wind turbines, if applicable.

Ecology

19. **Gearagh SPA, Mullaghanish to Musheramore SPA and on Wintering Waterbirds** - Additional information is required from the applicants to provide a better understanding of patterns and level of usage of the development site by wintering waterbirds, Hen Harrier and any other species of conservation concern that are known to be vulnerable to impacts from windfarms which were recorded during the winter season. Particular attention should be paid to species for which the SPAs and the surrounding wetland pNHAs have been identified to be important, and to raptors. The applicants are requested to provide their records for each timed VP winter watch, and the viewsheds for each VP should be shown on a map which includes the development boundary. Any information has been recorded relating to patterns of movement or behaviour of recorded species, within 500m of the development boundary of the site should be provided. This is in order to establish whether the site is located on a commuting route between wetland or upland sites in the surrounding area, to identify whether there is any connectivity to the above listed SPAs, or to other wetland bird sites, and to identify whether the site itself is of importance for wintering bird species. This assessment of potential for impacts on any of the above listed species identified to be using the area should be made having regard to SNH Guidance (see below), and should have regard to potential for cumulative impacts having regard to the existing wind farm at Garranereagh. Revision of the AA Screening Report may be required.

20. **White-tailed Sea Eagle** - The Irish Raptor Study Group hold records of movements of White-tailed Sea Eagle within the vicinity of this development site. It is recommended that the applicants be requested to clarify whether regard was had to these records for the purposes of completing assessment in relation to this species. A revised assessment may be required, if additional information relating to the occurrence of this species within the vicinity of the proposed windfarm emerges. This assessment should be made having regard to SNH Guidance (see below) and should take account of potential for cumulative impacts to arise having regard to the existing windfarm at Garranereagh.

21. **Barn Owl** - It is recommended that the applicants be requested to clarify whether regard was had to BirdWatch Ireland records for the purposes of their Barn Owl assessment. A revised assessment may be required, if additional information relating to the occurrence of this species within the vicinity of the proposed windfarm emerges. This assessment should be made having regard to SNH Guidance (see below) and should take account of potential for cumulative impacts to arise having regard to the existing windfarm at Garranereagh.

22. **Kestrel and Snipe** - It is recommended that the applicants be requested to provide additional detail in relation to their records of these species within the site, and that they provide an assessment of the potential for the development to give rise to impacts on these species, and the likely significance of any impacts which are identified. This assessment should be made having regard to SNH Guidance (see below) and should take account of potential for cumulative impacts to arise having regard to the existing windfarm at Garranereagh.

Assessment of the potential for the proposed windfarm to give rise to impacts on all species of bird referenced above, for which records of occurrence within or near the site exist, should include assessment of potential for impacts relating to habitat loss, displacement and collision risk. Assessing the significance of any identified impacts should be completed in accordance with SNH Guidance -Assessing Significance of Impacts From Onshore Windfarms on Birds Outwith Designated Areas (2006). Regard should be had to the potential for cumulative impacts in the making of these assessments. Where additional mitigation is required to minimise potential for impacts on any bird species on foot of these assessments, this should also be provided.

23. **Bats** – It is recommended that the applicants be requested to provide all results of bat survey work that was completed during the summer of 2014. This should include records of dates, times, locations and species for all bat sightings/recordings, and information relating to size and importance of known roost sites within 10km of the proposed development. All prospective or identified bat commuting routes and hunting areas within and adjacent to the site should be identified on a map. Figure 5.4 in the EIS should include the development site boundary as well as the study boundary and species specific information for bat records.

It is not entirely clear what mitigation is proposed to minimise impacts on bats. According to table 5.7, no removal of treelines or hedgerows is required, however, the habitat map (no scale provided) which has been provided indicates that a number of turbines including T2, T3 and T6 are all located adjacent to such features, and section 5.7.3 of the EIS suggests that vegetation clearance around turbines will be carried out. In the interest of clarity, locations of all scrub, treelines, hedgerows and stonewalls / banks which are proposed to be removed to minimise risk of impacts on bats should be identified on a map. Locations of new hedgerows or treelines which are proposed to be established within the proposed development site (as per pg 82 of the EIS) to mitigate for any such removal should also be identified on a map, and the details of species to be planted should be provided. It should be demonstrated that featureless buffer areas to be maintained around turbines have been calculated in accordance with Bats and Onshore Wind Turbines (Natural England Technical Information Note TIN051) and can be provided within the red line boundary. Where additional areas outside the development boundary are required to be managed as bat buffer areas, clarification should be provided as to how this can be achieved.

The assessment of potential for impacts on bats should be extended to include a detailed assessment of potential for the development to give rise to collision and / or barotrauma impacts. Likely significance of identified impacts on individual species of bat at a population level should also be included and should take account of potential for cumulative impacts to arise having regard to the existing windfarm at Garranereagh. Where additional mitigation is required to minimise potential for impacts on bats species on foot of the revised assessment, this should also be provided.

24. **Terrestrial Habitats** - It is recommended that the applicants be requested to provide a revised habitat map with complete legend showing the full extent of the development site as well as the study boundary (scale 1: 10,560). Please also provide an estimate of the area of each habitat type which will be required to be removed from the site to provide for the development of turbine hardstands, new roads and widening of existing roads/tracks and turning areas, development of borrow pit, temporary compound and all other ancillary infrastructure, and to create buffer zones for bats.
25. **Freshwater Habitats and Species** – No information has been provided in the EIS in relation to the fisheries and ecological value of either the Bride or the Cummer Rivers. It is proposed to discharge surface waters from this proposed development to a new drainage system which links to the Bride River in the south, and to the Cummer River to the north of the site, however, it is stated in the EIS that the increased levels of run-off will be of negligible significance in terms of hydrology, and that there is a negligible risk that this run off will give rise to impacts on water quality having regard to the protection measures which are to be implemented on site during the construction phase. These conclusions should be verified by a competent person. In the event that potential for impacts on hydrology/water quality on are identified, then further information in relation to the ecology and fisheries value of these and potential for impacts on same will be required from the applicants.

Noise and Vibration

26. Full location and descriptive details of the identified and referenced baseline noise monitoring locations should be submitted including the length and duration of monitoring conducted.

The selection process for such locations should be clearly outlined, explained and demonstrated. All information to support the claim that such locations are representative of noise sensitive locations in the vicinity of the proposed development should be submitted.

All input data used for the purpose of the selection of the monitoring locations should be submitted as well as details of any documentation, site assessments undertaken etc, to support and verify such input data and the claim that the selected locations are deemed representative of all non-surveyed noise sensitive locations in the vicinity of the proposed development.

The presence or otherwise of local noise sources noted at the identified locations should also be identified and commented on.

27. All on-site noise field log sheets in addition to all noise monitoring equipment and calibrator calibration results and certifications should be submitted.

28. Details of where wind speed measurements were conducted for the purpose of this assessment should be submitted and fully explained. A scaled map identifying the location of any on site meteorological mast that was used for the purpose of wind speed data collection should be submitted. The location and level of the mast should be clearly identified and plotted relative to the specific locations of the proposed turbines.

The respective distance of this mast to each proposed turbine and its location relative to same should also be clearly detailed.

29. The applicant should comment on the impact of any site specific wind shear and if the impact of same has been taken into account of in the monitoring data collected and used as part of the assessment.

30. Further assessment, examination and evaluation of existing background noise should be conducted in order to examine and fully quantify the current existing noise climate.

All monitoring data should be submitted. Such assessments should have due regard to wind speed, wind direction and rainfall over the same time periods. The applicant should clarify the periods of noise data that were excluded from analysis due to periods of rainfall.

Summary data tables should also be submitted to further illustrate and support the above.

It is also noted as per Table 9.6 of the submitted E.I.S. that night results for H-48 at winds of 11m/s and 12m/s are elevated above all other results. The

applicant should be asked if they have any comment to make or any explanation for this.

31. The rationale in applying the higher assessment noise limit of 40dB LA90 10 min for quiet daytime environments of less than 30 dB LA90 10 min. in the application as opposed to a 35 dB LA90 10 min Should be fully clarified and explained.

The Derived noise limits as per section 9.4.3 of the submitted Environmental Impact Statement should also be fully explained and a clear trail should be evident between the measured baseline noise levels, relevant DoEHLG guidance and resultant noise limits subsequently derived.

32. Full details of the model and input data used to produce the predicted noise levels at sensitive locations should be submitted. Any documentation to support and verify such input data should also be submitted. In this regard it is noted that the final make and model of turbine has not been decided to date. The impact the final choice of turbine (if different to the one used in the model) will have on predicted noise levels should be clearly demonstrated and illustrated. An Assessment of tonality with reference to the proposed Wind Turbine Manufactures octave sound power data at all operational speeds and modes of operation should also be undertaken. The impact of the proposed substation on the final predicted noise levels should also be clarified.
33. Full details of the final predicted Turbine Noise levels arising from the proposed development at sensitive receptors should be submitted covering a range of wind speeds. The receiver height of the final predicted noise levels should also be clarified.

It should be clearly demonstrated how the overall predicted results were arrived at and a clear trail should also be evident between the predictive model used and the final conclusions.

Any changes in the overall final predicted and cumulative noise levels at noise sensitive locations should be highlighted and commented on with any adjustments undertaken if necessary for the presence or otherwise of tonal/impulsive elements.

34. Construction phase noise impact assessment should be undertaken and submitted.

Transport/traffic

35. It is proposed to utilise a borrow pit on site for road making materials, however if materials have to be sourced from outside the site will the delivery route for these be the same route as highlighted in the planning application? The same query applies to concrete deliveries and all other deliveries other than the cranes and turbines.
36. The proposed route for deliveries in the planning application suggest these routes are for a one way delivery and access system. If this is the case the

other routes (exit routes) need to be specified as to allow for calculation of the length of road which will be affected by the construction traffic.

This request for further information is without prejudice to any decision the Council may take, either to refuse permission or to grant permission, with or without conditions. Please note that your application shall be declared to be withdrawn if all of the further information as required above is not submitted **within 6 months** of the date of this letter.

Please further note that where the Planning Authority considers that the further information request has not been fully complied with and requires clarification, the 4 weeks for making a decision (or 8 weeks in the case of an application accompanied by an EIS), does not begin until this clarification has been provided and the request for further information has been fully complied with.

Further consideration of your application is deferred pending receipt of the information requested.

Any response to this letter should clearly state that it is a response to a request for further information in connection with 14/06760 and be addressed to - **Planning Department South1, County Hall, Carrigrohane Road, Cork.**

Yours faithfully,



James Keane
Senior Executive Officer

