

Yvonne Harris
Irish Water
Covill House
24-26 Talbot Street
Dublin 1
D01 NP86

Date: 18th November 2022

Re: Wind farm development of 14 turbines with 110kV electrical substation and all related site works and ancillary development.

The townlands of Cahernacaha, Gortnabinna, Derryfineen, Gortyrhilly, Rath West, Derree, Fuhiry, Derreenaculling and other townlands, Co. Cork and Derryreag, Cummeenavruck, Glashacormick, Clydaghrone and Cummeennabuddoge, Co. Kerry.

Dear Madam,

An Bord Pleanála has received your submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course in respect of this matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of Cork County Council and Kerry County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

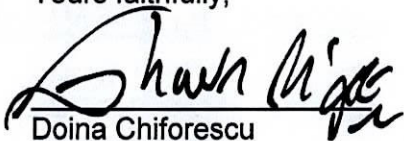
If you have any queries in the meantime, please contact the undersigned officer of the Board.

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Doina Chiforescu
Executive Officer
Direct Line: 01-8737133

PA09

Tell
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Láithreán Gréasáin
Ríomhphost

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Email bord@pleanala.ie

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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Shaun McGee

From: Cillian Claffey (C) <cillian.claffey@water.ie>
Sent: Tuesday 4 October 2022 16:43
To: SIDS
Subject: Irish Water Observations on Strategic Infrastructure Development SID_314602
Attachments: IrishWaterPlanningResponse_SID314602.pdf

AN BORD PLEANÁLA

04 NOV 2022

LTR DATED _____ FROM _____
LDG- 059215-22
ABP- 314602-22

Dear Sir/Madam,

Please find attached Irish Waters response to the above referenced Strategic Infrastructure Development for the proposed wind farm development of 14 turbines with 110kV electrical substation and all related site works and ancillary development in the townlands of Cahernacaha, Gortnabinna, Derryfineen, Gortyrahilly, Rath West, Derree, Fuhiry, Derreenaculling and other townlands, Co. Cork and Derryreag, Cummeenavrick, Glashacormick, Clydaghroe and Cummeennabuddoge, Co. Kerry.

Kind regards,

Cillian Claffey B.A, MPlan

Development Management Planning (North / West Region)

Uisce Éireann

Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86, Éire

Irish Water

Colvill House, 24-26 Talbot Street, Dublin 1, D01 NP86, Ireland

T + 01 89 25187

M +353 89 260 3904

cillian.claffey@water.ie

www.water.ie

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An Board Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
Éire

Irish Water
PO Box 6000
Dublin 1
Ireland

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

4th October 2022

Re: Strategic Infrastructure Development – ABP-314602-22 - Wind farm development of 14 turbines with 110kV electrical substation and all related site works and ancillary development in the townlands of the townlands of Cahernacaha, Gortnabinna, Derryfineen, Gortyrhilly, Rath West, Derree, Fuhiry, Derreenaculling and other townlands, Co. Cork and Derryreag, Cummeenavrick, Glashacormick, Clydaghrone and Cummeennabuddoge, Co. Kerry.

Dear Sir / Madam,

Irish Water has reviewed the information submitted as part of this Strategic Infrastructure Development and in particular the EIAR Volume I - Main Report (Chapter 9) submitted as part of the proposal to construct 14 turbines and all associated works in the townlands of the townlands of Cahernacaha, Gortnabinna, Derryfineen, Gortyrhilly, Rath West, Derree, Fuhiry, Derreenaculling and other townlands, Co. Cork and Derryreag, Cummeenavrick, Glashacormick, Clydaghrone and Cummeennabuddoge, Co. Kerry.

Windfarm construction has the ability to disturb a drinking water catchment area. This can have an impact on the quality of the raw water long term and increase the difficulty to treat the water and consequently, the cost of treatment. It is critical that any and all surface / ground water source(s) within proximity are protected from any possible pollution arising from the proposed development and it is an environmental objective of the Water Framework Directive is to protect drinking water sources and ensure no additional treatment is required.

Irish Water applies a precautionary approach to development proposals of this nature and / or any development proposals that may impact our physical assets and drinking water sources. Protection of drinking water source(s) from the potential adverse impacts of new development is a priority for Irish Water.

There can be no deterioration in the water quality and / or treatability any other Irish Water abstraction point(s) and/or watercourse(s) hydrologically and / or hydrogeologically connected to Irish Water abstraction point(s) arising from any preconstruction, construction or post construction, decommissioning and/or operational phases of this development proposal.

The study area of the development proposal crosses two Irish water drinking water catchments:

1. Zone 2 Ballingeary
2. Zone 2 Macroom

Ballingeary is a small catchment 17km² and only a small portion of the study area intersects the upper part of this catchment. From the map provided in the NTS summary (*Figure NTS-1*) it appears that approximately 3 turbines are positioned within this portion. The remaining turbines fall into the Macroom catchment which is 209 km² with the abstraction located quite far downstream.

Chapter 9 (Hydrology and Hydrogeology) addresses potential impacts to drinking water. On review, there is a lack of adequate information within this chapter to enable Irish Water to make a complete and thorough assessment of this development proposal and ensure that any Irish Water abstraction point(s) and / or watercourse(s) hydrologically and / or hydrogeologically connected to Irish Water abstraction point(s) are protected in accordance with the Water Framework Directive.

Irish Water notes some of the concerns identified in its review of Chapter 9 below:

- The EIA references scales of the project and assimilative capacity as a protection against potential impacts, yet does not provide evidence for this basis;
- There is no baseline data for organic carbon (dissolved, particulate or total), all of which have potential impact on the treatability of raw drinking water;
- Chapter 9 does not outline what the potential impacts on raw drinking water are and how these related to issues with operational treatment and implications for THMS;
- Treatment plants can be subject to issues with validation on treatment infrastructure at the plant should event loadings deliver high organic matter, with implications for public health;

- The carbon calculator cites figures for DOC and POC losses, but it is not integrated to the implications on water treatment.

When considering a development proposal, it is the applicant's responsibility to identify the location of all public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments and ensure these are included in the EIAR and fully assessed to ensure that there will be no negative impact to any of Irish Waters Drinking Water Sources during both the construction and operational phases of the development.

Irish Water is of the opinion that the applicant has not provided the information required to enable Irish Water to make a full assessment of the development proposal and ensure that there no deterioration in the water quality and / or treatability any other Irish Water abstraction point(s) and/or watercourse(s) hydrologically and / or hydrogeologically connected to Irish Water abstraction point(s) arising from any preconstruction, construction or post construction, decommissioning and/or operational phases of this development proposal.

In the context of the above, Irish Water respectfully requests An Board Pleanála to seek Further Information from the applicant to address Irish Waters concerns regarding Chapter 9 of the EIAR.

Queries relating to the terms and observations above should be directed to planning@water.ie

PP. Ali Robinson

Yvonne Harris

Connections and Developer Services