
Significant Additional Information (SAI) in relation to the proposed Cummeennabuddoge Wind Farm

From Bryan Riney <Bryan.Riney@CorkCoCo.ie>

Date Wed 7/1/2026 2:46 PM

To SIDS <sids@pleanala.ie>

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Cummeenabuddoge Wind SID. Significant FI report. Cork County Council.pdf;

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A Chara,

We refer to a letter from Atmos Consulting, dated 15/5/2026, regarding the notification of the submission of Significant Additional Information in relation to the proposed Cummeennabuddoge Wind Farm.

Please find attached the comments of the Planning Authority (Cork County Council) for your consideration.

Le dea-ghuí,

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Cork County Council
Planning and Development Act 2000 (as amended)
Planning and Development (Strategic Infrastructure) Act 2006

An Coimisiún Pleanála Ref. No:	ABP-321029-24
Applicant:	Cummeennabuddoge Wind Designated Activity Company (DAC).
Agents:	Atmos Consulting Ltd.
Site Location:	Within the townlands of of Cummeennabuddoge (County Kerry), Clydaghroe (County Kerry), Glashacormick (County Kerry), Cummeenavrack (County Kerry), and Caherdowney (County Cork). <u>Note:</u> The Proposed Development is located on land almost entirely within County Kerry, although a grid connection route is proposed within County Cork.
Proposed Development:	The Proposed Development consists of 17 turbines with a tip height between 199.5m and 200m above ground level (AGL), a permanent meteorological met mast with a height of 110m (AGL) and associated infrastructure. The associated infrastructure includes to the following: • One 110kV permanent electrical substation including a control building with welfare facilities, electrical plant and equipment, security fencing,

	underground cabling, wastewater holding tank and ancillary structures and associated works; • Underground electrical and communication cabling connecting the wind turbines to the proposed on site substation and associated ancillary works; • 110kV Underground cabling from the new 110kV permanent electrical substation to the existing 220/110kV Ballyvouskill Substation to facilitate export of electricity to the National Electricity Grid; • Erection of 1 no. Meteorological Mast of 110 metres above existing ground level for the measuring of meteorological conditions, including a lightning rod which will extent above the mast; • New permanent access tracks and permanent upgrades to existing tracks and site access; • Four borrow pits; • Six permanent peat repository areas; • Permanent placement of peat along sections of site access roads within the restrictions outlined in Technical Appendix 10-3 peat management plan for the site; • Construction of 3 no. temporary construction compounds and associated ancillary infrastructure including temporary site offices, staff facilities and car-parking areas, all to be removed at the end of the construction phase;
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	• Permanent and temporary Site drainage; • Keyhole forestry felling to accommodate the construction and operation of the proposed development; • Upgrading of existing site entrance at the local access road adjacent to the N22, Healthy and safety signage, information signage, and direction signage; • All other associated site development works including necessary earthworks to facilitate the construction and operation of the Proposed Development; A 10-year planning permission and 35-year operational life from the date of commissioning of the entire wind farm is being sought.
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Planning Authority report regarding Significant Additional Information received by An Coimisiún Pleanála.

1) Summary and Background

This application was made directly to An Coimisiún Pleanála as 'Strategic Infrastructure Development' (SID) under the provisions of Section 37E of the Planning and Development Act 2000 as amended.

The Proposed Development is contained within the townlands of Cummeennabuddoge (County Kerry), Clydaghroe (County Kerry), Glashacormick (County Kerry), Cummeenavrack (County Kerry), and Caherdowney (County Cork).

The Proposed Development consists of 17 wind turbines with a tip height of between 199.5 to 200 metres (m), and associated infrastructure including hardstandings, cabling and access roads. The Proposed Development also consists of a 110kv grid connection to Ballyvouskill.

The wind turbines and majority of infrastructure is contained in County Kerry. In relation to the functional area of County Cork, is proposed to connect to the national electricity grid via a 110kV underground cable from the proposed onsite substation to the existing Ballyvouskill 220/110kV substation. The grid connection cabling route from the proposed on-site substation will measure approximately 3.5km in length. The grid connection cabling route forms part of the proposed development, the subject of the planning application, and is assessed in the EIAR.

Access to the site, for construction and operation (including Heavy Goods Vehicles (HGV) and abnormal loads (such as turbine blades)) will be via the existing Coillte CGA site entrance currently used for forestry operations, in the west of the site (County Kerry), off a local access road which in turn is accessed from the National Road N22. The proposed turbine delivery route is from Ringaskiddy Port, County Cork, onto the N28, N40, N22, and then onto the local road to the site entrance.

A Chief Executive Report was previously issued to An Coimisiún Pleanála. This related to proposals for the installation of a grid connection which will occur in Cork County Council functional area and considered potential for the proposal in County Kerry to have a cross-boundary impact. The report also considered the potential for the proposed 17 turbines and associated works to give rise to impacts to European sites which occur within Cork County bounds, in terms of ex-situ occurrence of qualifying species, having regard to information which was provided in the EIAR and the Natura Impact Statement (NIS).

It was the considered view of Cork County Council that based on the information submitted and the detailed assessment provided that **further information** should be sought by An Coimisiún. The three main items are described below under the headings:

i. Ecology

The report of the Ecology Section of Cork County Council highlighted that the following information is required:

- It is considered that there is insufficient information available to complete Appropriate Assessment in respect of the Mullaghanish to Musheramore Mountains Special Protection Area and that additional information is required to complete the assessment in respect of Hen Harrier. As such, An Coimisiún Pleanála may wish to consider requesting additional information in relation to Hen Harrier usage of the site and surrounding area and the likely impacts of the proposed development on Hen Harrier. This information should include up-to-date survey data on all bird species targeted in the NIS and EIAR Chapter 9. As such, a revised NIS and EIAR Chapter 9 may be required.
- There are concerns in relation to the information provided regarding a number of species recorded in the EIAR, particularly avian species. It is considered that the data provided, at over three years old, should not be considered as a reliable component of the ecological assessment of the proposed site. This is especially important when considering the proximity of the site to the Mullaghanish to Musheramore Mountains SPA to the site and the potential for hen harrier (special conservation interest of the SPA) to utilise the site, especially considering the recent clear felling of forestry. As such, the following would be required:
 - Bird surveys for the proposed site, in line with recommended guidelines (e.g. NatureScot/SNH), to reflect the current usage of the proposed site and hinterland by species considered to be key ecological receptors.
 - Revised Natura Impact Statement and Ornithology Chapters to reflect the updated survey information.
- Regarding the grid connection route (GCR), a section of the eastern end of the proposed GCR is through wet heath habitat, which the EIAR deemed to be National value IEF. Per Chapter 8 of the EIAR, the proposed cable will result in the direct loss of 0.9ha of HH3 Wet Heath. This comprises a permanent moderate significant adverse effect on a National value IEF. It is noted that a general site wide description of the habitat has been provided but no specific description of the section to be removed to accommodate the GCR has been given. It is also noted that the applicants have not included a specific methodology for the reinstatement of the wet heath that will be removed, stating that the methodology would be agreed with the planning authority prior to works. It is considered that mitigation hierarchy be followed, whereby avoidance of impacts is principal. With this in mind, ACP may wish to consider requesting that the proposed grid connection route be along the existing track only, thus avoiding the removal of an approximately 1km strip of wet heath.

ii. Noise

The Environment Section sought clarity of the following:

- For the purpose of clarity, the respective number and distances of all noise sensitive receptors within 500m, 1000m, 1500m and 2000m of the turbines should be presented and quantified in tabular form.
- For the purpose of clarity and ease of reference, the referenced noise sensitive receptors that each background noise monitoring location is considered to be representative of should be quantified in sequential order. These should also be shown on a suitably scaled map along with the locations where the noise monitoring has been conducted to determine the existing noise environment.

iii. Roads

The Area Engineer report sought clarity of the following:

- The proposed main entrance to the site is located off the National Primary Road N22 in Co. Kerry. The applicant has stated that this entrance will be used for the delivery of material and personnel to the site. In Chapter 7 of the EIA Report, the applicant has stated that they have identified a number of quarries to supply material to the proposed development. Given the proximity of one of these suppliers to an existing forestry/Wind farm entrance located in Caherdowney, Cork County Council would have concerns that the L-5226 would be used as a short cut to access the site through existing tracks through Coillte own land. Therefore, confirmation is required from the applicant that this route will not be used for the delivery of materials to the site.

2) The Purpose of this Report

In accordance with the requirements of Section 37F(2) of the Planning and Development Act 2000, as amended, notice was given to Cork County Council that significant additional information had been submitted to the Commission.

This information was submitted on 30 March 2026 in response to a Request for Further Information issued by the Commission on 22 July 2025.

An Coimisiún requested then applicant to provide further information on the following matters:

1. To provide details of the likely significant environmental effects before mitigation, as required under Article 94 and Schedule 6 of the Planning and Development Regulations 2001 (as amended).
2. To update and expand the biodiversity and ornithology assessments, showing both pre-mitigation and post-mitigation effects, in line with CIEEM and EPA guidance.
3. To review the assessment of the Kerry Slug (Annex IV species), ensuring potential impacts are fully addressed and considering whether a Regulation 54 Derogation is required.
4. To supply updated mapping showing the proposed turbine locations and infrastructure in relation to nearby European Sites (SACs and SPAs), correcting inconsistencies in distance measurements.
5. To provide a map of the six vantage points used for bird flight activity surveys, including viewshed analysis.
6. To update bird survey data, particularly for key species such as the Hen Harrier, to reflect current site conditions and ensure assessments are based on the most recent information and submit an updated ornithology report and NIS.
7. To clarify the Collision Risk Modelling (CRM), ensuring that the species included align with those recorded during site surveys.
8. To provide a written response to public observations received in December 2024 and January 2025, addressing only the issues raised without introducing new reports.

The applicant has prepared a Response to Further Information (RFI) Report in response to the request issued to provide detailed technical information to address the queries, including clarifications, updated data, and revised assessments, while demonstrating compliance with planning legislation and guidance.

This additional information includes:

- A response to the Request for Further Information
- An updated Natura Impact Statement (NIS)
- Updated Environmental Impact Assessment Report (EIAR) documentation

- Relevant supporting technical appendices and figures

ACP has requested that is information is examined regarding:

- The implications of the proposed development for proper planning and sustainable development
- The likely significant effects on the environment
- The potential impacts on the integrity of any European sites, including compliance with Appropriate Assessment requirements

These documents have been circulated to the various sections of Cork County Council for assessment.

3) Assessment

i. Ecology

The Ecology Section of Cork County Council have reviewed the information received by ACP. The Planning Authority requested further ecological information, particularly regarding biodiversity and bird impacts. The applicant updated their reports to show both the likely environmental effects without mitigation and the remaining effects after mitigation. They also proposed restoring areas of degraded wet heath and blanket bog, claiming a net ecological gain. However, the assessment notes that restoring these habitats to good condition could take over 50 years, which is far longer than the project timeline, raising concerns about the effectiveness of the mitigation.

Concerns were also raised by the Planning Authority about impacts on protected species, especially the Kerry slug. The applicant carried out surveys and acknowledged that there would be moderate negative impacts without mitigation. They proposed mitigation measures and applied for a legal derogation to allow disturbance and relocation of the species. The assessment considers this information sufficient. Other technical clarifications, such as correcting site distances and providing maps for bird survey vantage points, were addressed adequately by the applicant.

An issue highlighted by the Ecology Section is the lack of consistent and up-to-date bird survey data. While some new data from 2024 was provided, there is a gap in survey coverage between 2021 and 2023. This gap creates uncertainty about how bird species, including sensitive species like hen harrier, currently use the site. The Ecology report concludes that the survey effort is insufficient and recommends at least two consecutive years of updated bird surveys to properly assess environmental impacts.

The Ecology Section also emphasises that avoiding ecological damage should be prioritised over relying on mitigation. For example, it recommends rerouting the proposed cable to avoid damaging wet heath habitats rather than attempting restoration afterward, as restoration success is uncertain and slow.

In conclusion, the Planning Authority believes there is not enough ecological data to fully assess the project's impact.

ii. Noise

The Applicant has provided a response to Cork County Council within Technical Appendix P of this document. Figures 13-1 and 13-2 of the 2024 EIA Report identify the locations of noise-sensitive receptors and associated noise monitoring points.

The Planning Authority previously recommended to An Coimisiún Pleanála that the number and distances of all noise-sensitive receptors within 500m, 1000m, 1500m, and 2000m of the proposed turbines be presented and quantified in tabular form in the original submission. However, the Environment Section notes that this requirement does not appear to have been fully addressed in the further information submitted.

In its review, the Environment Section of Cork County Council refers to Figures 13-1 and 13-2 of the 2024 EIA Report. Figure 13-1 illustrates predicted operational noise levels at rated power for the proposed development, while Figure 13-2 presents predicted operational noise levels at rated power on a cumulative basis. Notwithstanding these figures, the specific information requested—namely, the tabulated number and distances of all noise-sensitive receptors within specified distance bands (500m, 1000m, 1500m, and 2000m)—is not evident within the submission.

The Planning Authority reiterates that this tabulated assessment of receptors at defined distances should have been included. Having reviewed the further information received, it is considered that this matter remains insufficiently addressed.

Regarding Technical Appendix Note P, the Applicant contends that noise limits should apply solely to the turbines subject to the current consent. However, the Environment Section notes that it is standard practice, in the interest of protecting residential amenity, to apply noise limits at noise-sensitive locations that account for noise arising from the proposed development both individually and cumulatively with other permitted wind energy developments. This approach is reflected in numerous planning conditions previously issued by ACP.

iii. Roads

In response to the Area Engineer's query, the Applicant has confirmed, within the further information submission, that the L-5226 road will not be used as part of any designated construction traffic route to the site. The approved construction traffic routes are set out in the Construction Traffic Management Plan (CTMP), and all site traffic will be required to adhere to these designated routes. Compliance with the CTMP will form part of the

Contractor's obligations, which the Applicant states will ensure that unsuitable routes are not used by construction traffic.

The Area Engineer has reviewed this response and confirmed that it is acceptable.

4) Conclusion

A Chief Executive's Report was previously submitted to An Coimisiún Pleanála in relation to the proposed grid connection works within the functional area of Cork County Council and the potential for the associated development in County Kerry to give rise to cross-boundary impacts.

Having reviewed the information now before An Coimisiún Pleanála, it is considered that there are no material changes to the position set out in the original Chief Executive's Report. While it is acknowledged that certain matters have been addressed by the applicant, including issues relating to protected species such as Kerry Slug and the provision of certain technical clarifications and verifications, a number of matters remain outstanding.

In particular, elements relating to noise assessment, ecological mitigation measures, and certain aspects of the proposed environmental management approach remain either incomplete or insufficiently detailed to allow for a full assessment of their potential impacts.

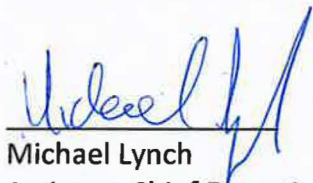
Accordingly, Cork County Council refers An Coimisiún Pleanála to the findings and recommendations contained in the original Chief Executive's Report. Should An Coimisiún Pleanála be minded to grant permission for the proposed development, the conditions recommended in that report remain relevant and should be considered for inclusion in any grant of permission.

Bryan Riney

Bryan Riney
Senior Planner



Ger Barry
Director Planning and Environment


Michael Lynch
Assistant Chief Executive (South)

5) Appendix A - Internal Reports

i. Ecology Section

Having regard to the proposed SID, which entails the 10 year planning permission for wind energy development consisting of 17 no. wind turbines and related works, further information was sought by An Coimisiún Pleanála. The applicants response has been considered with regard to the proposed works within the operational area of Cork County Council and my assessment of same is detailed below.

Item 1.6

"It is noted that the application of CIEEM approach in the presentation of impacts where it is stated that In EclA it is only essential to assess and report significant residual effects that remain after mitigation measures have been taken into account (see paragraphs 5.24 to 5.28). The guidance goes on to state the following:

However, it is good practice for the EclA to make clear both the potential significant effects without mitigation and the residual significant effects following mitigation, particularly (emphasis provided):

- a) where the mitigation proposed is experimental, unproven or controversial; or*
- b) to demonstrate the importance of securing the measures proposed through planning conditions or obligations.*

The EPA Guidelines on the information to be contained in EIAR for Ireland is clear that the assessment of effects is presented without mitigation.

Therefore, the Commission requests that the biodiversity and ornithology assessments be resubmitted detailing potential significant effects (direct and indirect) in absence of mitigation to allow for assessment of effects and analysis of likely effectiveness of mitigation."

Applicant's Response: The applicants have states that they have revised the Biodiversity Chapter to clearly outline both potential significant effects in the absence of mitigation and residual effects following mitigation. The response further states that 4.76ha of degraded wet heath and 4.69ha of degraded blanket bog will be enhanced to good condition. The applicants argue that, set against the losses of 2.03ha degraded wet heath and 1.56ha of degraded bog, would deliver a net gain.

Assessment: Having regard to the restoration of wet heath and blanket bog to good condition, while dependant on various factors, for habitats like blanket bog, achieving good condition can take over 50 years which is beyond the scope of the project.

Item 1.7

"Following on from the point above, the assessment of potential impacts on Annex IV species Kerry Slug in particular is inadequate and likely significant effects underestimated.

It is requested that this assessment is revisited and additionally, in view of the recent Guidance on applications for Regulation 54 Derogations for Annex IV species published by the Department of Housing, Local Government and Heritage, you are requested to consider the need for a derogation for

disturbance and relocation of Kerry slug to accompany the application - (see page 18- Timing of application of derogation)."

Applicant's Response: The applicants confirm that dedicated surveys for Kerry slug were carried out on site in January 2026 and that the survey programme was carried out under licence. Per the submitted response, in the absence of mitigation a permanent moderate adverse effect is predicted on Kerry slug. Mitigation measures and confirmation that a Regulation 54 derogation is needed for disturbance and relocation of Kerry slug. An application for such a licence was submitted to the NPWS.

Assessment: It is considered that the information submitted is sufficient.

Item 1.8

"Please provide a drawing of the location of the proposed windfarm with turbines locations and associated infrastructure in context with nearby European Sites with distance measurements referred to in the EIA and NIS documentation as the distances reported do not align for Mullaghanish Bog SAC or for Mullaghanish to Musheramore Mountains SPA."

Applicant's Response: The applicants have outlined that they have corrected the listed distances.

Assessment: No comment to make on this point

Item 1.9

"Please provide a map showing 6 number vantage points used for flight activity surveys with viewshed analysis."

Applicant's Response: The applicants submitted the requested map.

Assessment: No comment to make on this point

Item 1.10

"Data presented from Vantage Point surveys bird surveys covers the period 2018/2019, 2019/2020, 2020/2021. There is reference in Chapter 9 to surveys in 2022-2023 but no data corresponding to that period is presented. Other surveys for individual species date back to 2019.

Survey data submitted with the planning application in October 2024 was between 3 and 5 years old and in terms of the CIEEM note on the lifespan of ecological reports and surveys the validity of such data should be questioned. This is particularly the case where there has been significant changes to habitats present e.g. changes in forestry cover.

You are requested to provide updated survey data for key bird species including Hen Harrier that is representative of the current use of the site and hinterland area so that AA and EIA can be based on best available data (or provide robust scientific rationale on why this is not required). A revised Ornithology report and NIS should be provided to reflect the updated findings."

Applicant's Response: The applicants submitted information from surveys undertaken in 2024 and state that there has been no change in the occurrence of species present over and around the

Proposed Development Site which would mean that the findings of Chapter 9: Ornithology of the Environmental Impact Assessment Report would still be valid and that the recently felled commercial forestry has not affect usage of the proposed site.

Assessment: There are still have concerns regarding the survey effort and results for same. It is considered that there is an absence of three years of survey effort (2021, 2022, and 2023) between August 2020 and the start of the and therefore, an absence of information regarding the use of the proposed site by target species.

Responses to Consultee Observations:

In relation to the loss of wet heath habitat as a result of the laying of the proposed cable. The applicants assert that this habitat will be replaced and an additional enhancement of wet heath habitat will be undertaken. I contend that impact avoidance has not be pursued and as the proposed measures of replacing the turves is not guaranteed to be successful, would still recommend running the cable along existing tracks. As already mentioned under Item 1.6, achieving good condition for wet heath and blanket can take over 50 years, especially if the land had been afforested in the past (Rydren, K., *et al*, 2025)¹. This is beyond the timeline of the project,

Having regard to pre and post construction bird survey, I note the applicants' intent to undertake woodcock survey only. I consider that given the changing landscape that will occur, including the felled conifer woodland, surveys for all mentioned target species should be undertaken.

Conclusion:

It is considered that the survey effort to be insufficient and not consistent enough to allow the planning authority, in the case An Coimisiún Pleanála, to fully assess the use of the site by target species and assess potential impacts. It is the recommendation of the Cork County Council that two consecutive years of bird surveys be undertaken, including but not limited to winter surveys and raptor breeding surveys.

It is the opinion of Cork County Council that, where possible, impacts should be avoided rather than mitigated against. In this regard, the proposed cable to Ballyvouskill substation should be re-routed to avoid the need to excavate wet heath habitat.

¹ Rydgren, Knut, Roxane Andersen, Rune Halvorsen, Mark H. Hancock, Robert D. Hughes, Alice Martin-Walker, Joachim P. Töpper, and Neil Cowie. 2025. " Restoration of Formerly Afforested Blanket Bog: Estimating Time for Vegetation Recovery." *Ecological Applications* 35(8): e70138. <https://doi.org/10.1002/eap.70138>

ii. Environment (Air, Noise and Vibration)

The response in relation to noise, submitted as part of the overall further information response. The two issues raised as part of the original submission are as set out per item 1 and Item 2 below;

Item 1:

1.) For the purpose of clarity the respective number and distances of all noise sensitive receptors within 500m, 1000m, 1500m and 2000m of the turbines should be presented and quantified in tabular form.

Response: The further information submission does not appear to have fully addressed this item. The further information submission refers to Figures 13-1 and 13-2 of the 2024 EIA report. Figure 13-1 of 2004 report refers to Predicted Operational Noise Levels at Rated Power -Proposed development while Figure 13-2 refers to Predicted Operational Noise Levels at Rated Power- Cumulative. The information requested namely *'the respective number and distances of all noise sensitive receptors within 500m, 1000m, 1500m and 2000m of the turbines should be presented and quantified in tabular form.'* does not appear to form part of the submission.

Item 2:

2.) For the purpose of clarity and ease of reference, the referenced noise sensitive receptors that each background noise monitoring location is considered to be representative off should be quantified in sequential order. These should also be shown on a suitably scaled map along with the locations where the noise monitoring has been conducted to determine the existing noise environment.

Response: The further information response does not appear to have fully addressed this issue. The further information submission again refers to Figures 13-1 and 13-2 of the 2024 EIA report. Figure 13-1 of 2004 report refers to Predicted Operational Noise Levels at Rated Power -Proposed development while Figure 13-2 refers to Predicted Operational Noise Levels at Rated Power- Cumulative.

General Comment in relation to suggested condition(s):

In relation to the submitted Technical Appendix Note P, it is submitted that noise limits should apply only to the turbines being consented. It is generally considered that the application of noise limits in the interest of residential amenity, externally at noise sensitive locations, with respect to *'wind turbine noise arising from the proposed development, by itself or in combination with other permitted wind energy development.....'* is common and from review, is detailed in numerous examples of planning conditions issued by An Coimisiun Pleanála.

