APPENDIX 2-1

SCOPING RESPONSES

GENERAL SCOPING ROUND 1 - 2021 RESPONSES

Shaun Doolin

From: Tina Aughney <tinaa@batconservationireland.org>
Sent: Tuesday 2 February 2021 11:42
To: Karen Mulryan
Subject: Re: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Follow Up Flag: Follow up
Flag Status: Flagged

Morning Karen,
Bat Conservation Ireland is a small wildlife charity and, consequently, does not have the administrative capacity to comment on individual planning proposals. Please ensure that surveying is undertaken in a manner that meets best practice guidelines in relation to bat surveying, bat mitigation and monitoring. Bat Conservation Ireland data can be queried for bat records through the National Biodiversity Data Centre which holds bat records and the Bat Landscape Favorability map. Alternatively bat records can be queried for a fee directly from Bat Conservation Ireland.

Regards,
Bat Conservation Ireland

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---- On Tue, 02 Feb 2021 10:46:06 +0000 **Karen Mulryan <kmulryan@mkoireland.ie>** wrote ----

Good morning Tina,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

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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.
Please note, you may receive a hard copy of this also, apologies as I was made aware you preferred email documents after posting was initiated by the admin department.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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The sender does not accept liability for any damage caused by, or errors or omissions in this message.
Bat Conservation Ireland. Registered address: Carmichael House, 4-7 North Brunswick Street, Dublin 7, D07 RHA8. Company Limited by Guarantee (CRO) No. 494343. Charity Number (CRA): 20039417. website: www.batconservationireland.org

Shaun Doolin

From: padraig.condon@bt.com
Sent: Tuesday 2 February 2021 16:48
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Hi Karen,
I can confirm planned development will have no impact on the BT Ireland microwave network.

Regards

Padraig Condon
Core Network Operations

Tel: +353014326819
Mobile number: +353 86 604 0636
BT Meetme: + 353 1 6569053
E-mail padraig.condon@bt.com
https://www.webjoin.com/
Participant: 40342233#
Web: www.btireland.com

This email contains information from [insert appropriate legal entity name, e.g British Telecommunications plc, BT Nederland NV, BT Americas Inc, BT Australasia Pty Ltd] which may be privileged or confidential. It's meant only for the individual(s) or entity named above. If you're not the intended recipient, note that disclosing, copying, distributing or using this information is prohibited. If you've received this email in error, please let me know immediately on the email address above. Thank you. We monitor our email system, and may record your emails.

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: 02 February 2021 12:56
To: Condon,PG,Padraig,NQE32E R <padraig.condon@bt.com>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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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.

The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Shaun Doolin

From: Roger Woods <rwoods@bai.ie>
Sent: Tuesday 2 February 2021 13:00
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Hi Karen

The BAI does not perform an in-depth analysis of the effect of wind turbines on FM networks. However, we are not aware of any issues from existing windfarms into existing FM networks. Also, the proposed windfarms are not located close to any existing or planned FM transmission sites.

Regards

Roger

Senior Executive Engineer
Broadcasting Authority of Ireland
2-5 Warrington Place
Dublin D02 XP29

Tel: 01 6441200
Fax: 01 6441299

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From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 2 February 2021 12:55
To: Roger Woods <rwoods@bai.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Lakshmi Priya

From: Manager DAU <Manager.DAU@chg.gov.ie>
Sent: Thursday 11 February 2021 11:50
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

G Pre00039/2021

Karen

I acknowledge receipt of your recent consultation.

In the event of observations, you will receive a co-ordinated heritage-related response by email from Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email manager.dau@chg.gov.ie.

Regards

Michael Murphy
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: Tuesday 2 February 2021 10:42
To: Manager DAU <Manager.DAU@chg.gov.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Karen.

Karen Mulryan
Environmental Scientist

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Lakshmi Priya

From: Manager DAU <Manager.DAU@housing.gov.ie>
Sent: Tuesday 15 June 2021 14:40
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Our Ref: G Pre00179/2021 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

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Kind regards,

Connor Rooney
Executive Officer
—

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90
———

From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: Tuesday 15 June 2021 10:30
To: Diarmuid Buttimer <Diarmuid.Buttimer@housing.gov.ie>; Manager DAU <Manager.DAU@housing.gov.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Karen Mulryan
Environmental Scientist BA MSc ACIfA IAI

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From: Karen Mulryan
Sent: Thursday 10 June 2021 11:08
To: Manager DAU <Manager.DAU@chg.gov.ie>
Subject: G Pre00039/2021/ 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Michael Murphy
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
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Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
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Karen Mulryan
Environmental Scientist

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Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

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Lakshmi Priya

From: Manager DAU <Manager.DAU@housing.gov.ie>
Sent: Wednesday 4 August 2021 11:41
To: Karen Mulryan
Subject: Ballydermot Wind Farm
Attachments: Ballydermot Wind Farm.pdf

A Chara,

Please find attached heritage recommendations for the above mentioned planning application.

Regards
Connor

Connor Rooney
Executive Officer

Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90

****
Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

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****

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: Ballydermot Wind Farm
Our Ref: **G Pre00179/2021**
(Please quote in all related correspondence)

04/08/2021
MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
Via email kmulryan@mkoireland.ie

Re: Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

A chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

Nature Conservation

1. During the desk study include a search of records from the NBDC, for both common and rare species which occur in the area.
2. Include a month-long, static bat detector deployment during the month of August, following the findings of Scottish Power research into bat usage on their windfarms.
3. Have a detailed look at invasive species and the means which will be taken to control them.
4. Detail any restoration conditions attached to IPC licences for these sites and how they will be fulfilled during this development.
5. Add a section on how this site can be enhanced for the provision of ecosystem services (climate change mitigation, provision of clean water, nature-based amenity etc.) during the operational stage of the development.
6. Examine amenity use versus conservation interests e.g. ground-nesting birds.
7. Include survey for marsh fritillary in any suitable habitat.
8. Examine the effects of any necessary lighting on wildlife during construction as well as operation phases and include mitigation to reduce or eliminate it.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/ies, in her/his role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@housing.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas



Connor Rooney
Development Applications Unit

Shaun Doolin

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Tuesday 2 February 2021 15:07
To: Karen Mulryan
Cc: Gareth O'Flaherty (Defence); Sarah Zacharia (Defence)
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon Karen,

We wish to acknowledge receipt of your e-mail.

We will consult with our Military colleagues and revert in due course.

Best regards

Don

Don Watchorn

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 492199
E-mail don.watchorn@defence.ie

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 2 February 2021 10:48
To: Gareth O'Flaherty (Defence) <Gareth.OFlaherty@defence.ie>; Raymond Myles (Defence) <Raymond.Myles@defence.ie>; Ciaran Desmond (Defence) <Ciaran.Desmond@defence.ie>; Eilish Keating (Defence) <Eilish.Keating@defence.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the

development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Shaun Doolin

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Monday 1 March 2021 17:02
To: Karen Mulryan
Cc: Gareth O'Flaherty (Defence); Sarah Zacharia (Defence)
Subject: FW: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Karen,

In response to your e-mail below re. proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

Having consulted with our Air Corps colleagues, The Department of Defence would like to make the following observations:

1. The Irish Air Corps uses the EI-R16 and Military Operating Areas (MOA's) to conduct pilot training and to recover aircraft making approaches under instrument flight rules to Casement Aerodrome. Instrument approach procedures to Casement Aerodrome are primarily conducted from the West though the EI-R16. The airspace is in use nearly every day of the year. This area is designated in accordance with Section 68 of the IAA Act for use by the Defence Forces and published in ENR 5-2 of AIP IRELAND. Military aircraft in this airspace may not be flying in compliance with the rules of the air.

2. The Department of Defence is opposed to the erection of wind farms or other obstacles which will effect the ability of the Air Corps to train and operate in a safe and economic manner. The some of our key concerns of the proposed wind farm at Ballydermot are as following:

    a. The proposed development lies on lands underlying military airspace EI-R16 and MOA 4 within the 20 nautical miles (NM) area of Casement Aerodrome that is protected against tall structures. At its nearest, the wind farm boundary is 16NM from Casement Aerodrome. The approximate center point is 19.5NM from Casement Aerodrome.

    b. The proposed development lies within the EI-R16 and MOA 4 and the Edenderry/Allenwood/Rathangan Low Flying Training Area. The proposed wind farm would negatively impact Air Corps low level pilot training in the area.

    c. The routes taken by Air Corps aircraft to multiple training areas in the MOA 4 and MOA 5 pass through the area of the proposed development. The proposed development will reduce aircraft navigability in a large portion the EI-R16 and MOA 4.

    d. Military and civil aircraft transiting the EI-16 are often instructed by Military Air Traffic Control (ATC) to track underneath the base level of the relevant EI-R16 sector to provide required separation from aircraft above that are flying under Instrument Flight Rules (IFR). This required standard aircraft separation is a minimum of 1000 feet with the base level of restricted airspace above the proposed wind farm at 1500ft above mean sea level (AMSL). The proposed wind farm may impact the ability of aircraft to transit

underneath and clear of military restricted airspace to provide IFR separation to traffic above.

3. The Scoping document refers to other wind farms already in the Kildare/Offaly area in support of the development. Conversely the cumulative impact of wind farms will negatively affect navigability for civil and military aircraft operating underneath and in the EI-R16 and MOA's.

Please be advised that The Department reserves the right to submit further observations/objections should a Planning Application be made for this proposed windfarm development.

Furthermore, we would appreciate if you could keep us informed on all developments relating to this proposed development, especially in regards the observations made by the Department of Defence.

Please contact me if you have any queries in this regard.

Best regards

Don

Don Watchorn

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 492199
E-mail don.watchorn@defence.ie

From: Defence Property Management Planning
Sent: Tuesday 2 February 2021 15:07
To: kmulryan@mkoireland.ie
Cc: Gareth O'Flaherty (Defence) <Gareth.OFlaherty@defence.ie>; Sarah Zacharia (Defence) <Sarah.Zacharia@defence.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon Karen,

We wish to acknowledge receipt of your e-mail.

We will consult with our Military colleagues and revert in due course.

Best regards

Don

Don Watchorn

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 492199
E-mail don.watchorn@defence.ie

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 2 February 2021 10:48
To: Gareth O'Flaherty (Defence) <Gareth.OFlaherty@defence.ie>; Raymond Myles (Defence) <Raymond.Myles@defence.ie>; Ciaran Desmond (Defence) <Ciaran.Desmond@defence.ie>; Eilish Keating (Defence) <Eilish.Keating@defence.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Shaun Doolin

From: MKO-Admin
Sent: Wednesday 21 April 2021 15:06
To: Karen Mulryan
Subject: FW: Your Ref: 191136 -scoping response
Attachments: 20210421 DoT response.docx

From: GCU - Reform Communications and Emergency Planning Divisional Mailbox <GeneralCo-OrdinationUnit@transport.gov.ie>
Sent: Wednesday 21 April 2021 12:15
To: MKO-Admin <info@mkoireland.ie>
Subject: Your Ref: 191136

Dear Sir/ Madam,

Please find attached observations from Department of Transport in relation to the proposed development referenced above.

Apologies for delay in responding but we are currently working remotely and would appreciate if any future correspondence for the Department could be sent by email to GCU@transport.gov.ie

Regards
Jacqui

Jacqui Traynor
Reform Communications Emergency Planning

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177
Jacquitraynor@transport.gov.ie www.gov.ie/transport

****
Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar www.transport.gov.ie

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An Roinn Iompair
Department of Transport

MKO
Tuam Road,
Galway
Ireland
H91 VW84
21st April 2021

Your Ref: 191136

Re: EIA Scoping Document for Proposed Bord Na M6na Powergen Ltd Wind Farm. Development at Ballydermot, Co. Offaly/Kildare

Dear Sir/ Madam,

The Department of Transport has the following comments in relation to the above development proposals.

In the event that the developer proposes the placement of any cables (or additional cables) within the extents of the (regional and local) public road network, this will requires careful consideration. Cables running separately or combined in groups in one or more trenches would significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and likely add to the costs of those works. It will also restrict space available to other utilities in the road cross-section.

The proposal should include consideration of the following:

- **Options other than the routing of cables along the public road,**
- **Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance,**
- **Details of any chambers proposed within the public road cross section so as to minimise the effect on the Roads Authority in its role of construction and maintenance and,**
- **Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).**

Lána Líosain, Baile Átha Cliath, D02 TR60, Éire
Leeson Lane, Dublin 2, D02 TR60, Ireland
T +353 1 6707444 | info@transport.gov.ie
www.gov.ie/transport

As we are currently working remotely it would be appreciated if you could forward any future correspondence by email to gcu@transport.gov.ie

Yours sincerely,

Jacqui Traynor
Reform Communications Emergency Planning

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60
Currently working remotely

Shaun Doolin

From: MKO-Admin
Sent: Monday 15 March 2021 16:14
To: Karen Mulryan
Subject: FW: Ballydermot Windfarm - Scoping Opinion under Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU (EIA Directive)
Attachments: EIA Scoping Document Bord na Mona Powergen Ltd - Ballydermot Windfarm.pdf; Department of Agriculture, Food & the Marine.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: EIAPlanning <eiaplanning@epa.ie>
Sent: Monday 15 March 2021 16:11
To: MKO-Admin <info@mkoireland.ie>
Subject: Ballydermot Windfarm - Scoping Opinion under Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU (EIA Directive)

Re: **Scoping Opinion under Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU (EIA Directive)**

Dear Sir /Madam,

I refer to the scoping request for a wind energy development by Bord na Móna Powergen Ltd. located at Ballydermot and the surrounding townlands on the Offaly/ Kildare border, received by the Agency on 16/02/2021.

In accordance with the requirements of Article 5 (2) of Directive 2011/92/EU as amended by Directive 2014/52/EU *on the assessment of the effects of certain public and private projects on the environment* (EIA Directive), the Agency has consulted with the Planning Authorities Offaly County Council and Kildare County Council and relevant prescribed bodies. Attached is a copy of the response received from the Department of Agriculture, Food & the Marine. No other responses were received within the timeframe set out.

The Scoping Document provided refers to the land-use/activities within the proposed site comprising a mix of areas not long out of commercial production (undertaken under IPC Licence No. P0503), with smaller areas of remnant bog, remnant raised bog, regenerating cutaway bog, conifer plantation, woodland and scrub. It should be noted that Bord na Móna Allen Peat Limited, Allen Group, c/o Derrygreenagh Works, Rochfordbridge, Westmeath was issued an IPC Licence (Register No. P0503) on 28th April 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 '*the extraction of peat in the course of business which involves an area exceeding 50 hectares*'. The IPC licence may need to be reviewed or amended to accommodate the proposed development.

Having regard to the specific characteristics of the project, including location and technical capacity, and likely impact on the environment, the Agency is of the opinion that the scope and level of detail to be included in the environmental impact assessment report should as a minimum:

(i) identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of a project on each of the factors listed in Article 3 of the EIA Directive;

(ii) address the matters raised in the responses received from the bodies detailed above;

(iii) have regard to the rehabilitation plan(s) required under Condition 10 of Licence Reg No. P0503 for any bog areas relevant to the proposed development;

(iv) have regard to the requirements of the draft *Guidelines on the information to be contained in Environmental Impact Assessment Reports*, as appropriate;

(v) have regard to the relevant topics contained in the EPA's *Advice Notes on Current Practice (in the preparation of Environmental Impact Statements)* September 2003.

(vi) satisfy the requirements of the EIA Directive.

If you require any further information in relation to this matter, please contact the undersigned.

For all further queries and correspondence relating to planning and EIA matters, please contact eiaplanning@epa.ie

Yours faithfully,

Environmental Licensing Programme
Office of Environmental Sustainability
Tel: 053-9160600

From: Environmental Co-ordination (Inbox)
To: EIAPlanning
Subject: RE: Scoping Consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive) - BNM Powergen Ltd, Ballydermot
Date: 08 March 2021 14:13:25

Dear Sir/Madam,
The following are the comments from the Department of Agriculture, Food & the Marine in relation to the proposed development at Ballydermot, Co. Kildare.

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Tel: 076-1064459, Web https://www.agriculture.gov.ie/forestservice/treefelling/treefelling/

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; https://www.agriculture.gov.ie/media/migration/forestry/treefelling/FellingReforestationPolicy240517.pdf As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices for 2020 are published online at: https://www.agriculture.gov.ie/forestservice/publicconsultation/environmentalimpactassessmenteiapublicconsultationforafforestationforestroadconstructionandfellinglicenses2020/

3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 28 days to the Forestry Appeals Committee. Felling Licence decisions for 2020 are published online at: https://www.agriculture.gov.ie/forestservice/publicconsultation/environmentalimpactassessment-2020registerofdecisions/

It is important to note that when applying to **a Local Authority**, or **An Bord Pleanàla**, for planning permission where developments are:

a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or

b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and

c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,

   1) that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;
   and
   2) pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanàla, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.

Kind regards

Cathy Hewitt
Executive Officer
An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh,
Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine
Pailliún A, Páirc Gnó Grattan, Bóthar Átha Cliath, Port Laoise, Co Laoise, R32 K857
Pavilion A, Grattan Business Park, Dublin Road, Portlaoise, Co Laois, R32 K857
T +353 (0)57 868 9915 environmentalco-ordination@agriculture.gov.ie
www.agriculture.gov.ie

From: EIAPlanning [mailto:eiaplanning@epa.ie]
Sent: 22 February 2021 17:03
To: An Bord Pleanala; An Taisce; Environmental Co-ordination (Inbox); Department of Arts, Heritage, Regional, Rural & Gaeltach Affairs; Dept of Communications, Climate Action & Environment; Dept of Communications, Climate Action and Environment; Eir Grid; Failte Ireland; Health & Safety Authority; Health Service Executive; Inland Fisheries Ireland; Irish Water; Minister for Transport, Tourism and Sport; Teagasc; The Heritage Council; Offaly County Council (Environment Section); Offaly County Council (Planning Section); Kildare County Council (Environment Section); Kildare County Council (Planning Section)
Subject: Scoping Consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive)

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Re: Scoping Consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive)

Dear Sir /Madam,

I refer to the attached EIA Scoping request received by the Agency on 04/02/2021 in respect of the following:

Name of applicant: Bord na Mona Powergen Limited
Location of Activity: Ballydermot, Co. Offaly/Kildare
Nature of Activity: Windfarm Development

In order to satisfy the consultation requirements under Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU (EIA Directive), please revert to the Agency with your comments on the scope and level of detail of the information to be included by the developer in the Environmental Impact Assessment Report within two weeks of the date of this email.

For all further queries and correspondence relating to planning and EIA matters, please contact eiaplanning@epa.ie

Yours faithfully,

Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Tel: 053-9160600
Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolais san ríomhphost seo, agus in aon ceangláin leis, faoi phribhléid agus faoi rún agus le h-aghaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scrios an t-ábhar ó do ríomhaire le do thoil.

Shaun Doolin

From: Juliet Ryan <Juliet.Ryan@ervia.ie>
Sent: Monday 8 March 2021 10:28
To: Karen Mulryan
Cc: Kehoe, John
Subject: EIAR Scoping Ballydermot Windfarm

Hello Karen

Apologies for the delay in reverting on this. I wanted to ensure that a full consideration was given to the scoping document both internally in the Ervia Water Supply Project (WSP) team and by our consultants, Jacobs Tobin.

Thank you for the opportunity to review, and allow me to note that the scoping document is clear and comprehensive. We would be more than happy to discuss any issues arising from our comments below at your convenience.

Our comments are ordered as General Commentary (i.e. applicable to all aspects of scoping) and Specific Commentary (more detailed commentary on scoping).

GENERAL COMMENTARY:

- Under the **Cumulative Impacts** section (Section 4.4.6), whilst it is extensive in relation to Wind Farm projects there is a requirement to consider all project types (such as WSP)
- Approach to **Hydrology and hydrogeology** have been outlined in the scoping report. We note the need for cognisance of the WSP project in this respect due to the challenging nature of construction in peat and any issues arising.
- We would suggest that detail is provided regarding the **Water Framework Directive** to demonstrate how the project will not prevent the achievement of WFD objectives (notably measurable parameters such as ammonia and silt).
- As outlined in the scoping document, **Biodiversity** is a key area for consideration. As part of the WSP bat surveys were undertaken; namely driving transect surveys in 2019 south of Edenderry. Four species of bat were recorded on the road network close to Codd 2, including Common pipistrelle, Soprano pipistrelle, Leisler's bat, Nathusius' pipistrelle. The common pipistrelle was the most frequently recorded bat species within this driving transect.
- It is clearly stated that **ornithological surveys** have occurred over a number of years including both winter and breeding bird surveys. Surveys undertaken by WSP have noted breeding lapwing and snipe records within the bog complex between the R400 and R403 roads south of Edenderry.
- We note the intention to seek consent as SID infrastructure, but that if ABP deems the project not to be SID that s.34 applications will be made to Kildare and Offaly County Councils, respectively. We assume that a **single EIAR** will be prepared to accompany both applications?
- BnM will no doubt be mindful of issues raised in **ABP's EIA of Drehid** (ABP Ref 300506) and any issues that would be pertinent for the subject project's EIAR.
- We note that a **Grid Route Options Assessment** will be undertaken, with the preferred grid option(s) to be assessed in full in the EIAR.
- We would welcome discussion as to how the **WSP corridor** (and construction compounds and depots) should be included on constraints mapping (we note an initial turbine layout is currently underway based on such mapping)
- We would welcome further discussion with respect to **opportunities** that might arise for both projects (e.g. location of recreation and amenity areas; location of permanent access roads etc)
- We note a CEMP is being prepared. Will this include a **Surface Water Management Plan** (SWMP) or will a separate SWMP be prepared?

- Whilst appreciating that this is likely premature at this stage, we would welcome further engagement on project timelines and **construction programme.**
- With respect to Traffic, we would note that account should be had of proposed construction **haul roads** for WSP and associated traffic movements.
- With respect to **Material Assets** (and noting that construction programme is not yet known), we would welcome further discussion on any windfarm cables, ducts, infrastructure etc in the WSP's construction corridor and appropriate design / mitigation measures for same (having regard to likely significant construction / commissioning implications for WSP)

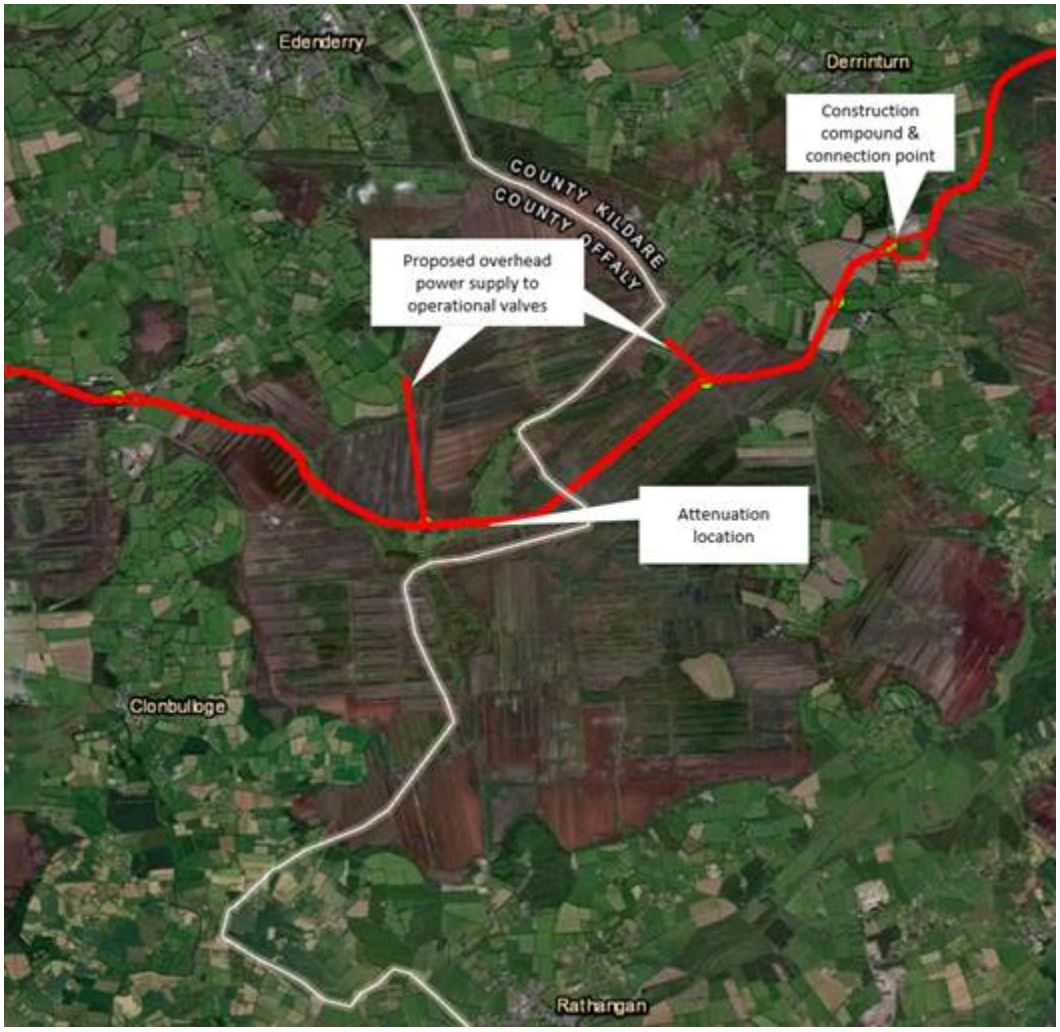
SPECIFIC COMMENTARY:

Pipeline Route

The proposed pipeline, as part of the WSP will run through the proposed Ballydermot Wind Farm site, including the following bogs:

- Codd 2,
- Glashabaun North
- Glashabaun South
- Derrybrennan

The potential route of the pipeline is shown below in red, though I note that this is not the final boundary. There will need to be a 50m construction corridor and 20m permanent wayleave associated with the pipeline. At Mount Lucas wind farm, the pipeline was placed at least 100m from the turbines. Additionally, it may be necessary to shut down some of the turbines during construction of the pipeline, for health and safety.



Power supply to pipeline

There are two locations within the proposed Ballydermot Wind Farm site where overhead power lines have been suggested. These would enable a power supply to the line valves of the pipeline. Bord na Móna have assessed these sites and have already provided a suggested re-route for one of these lines.

According to the MKO Report - "*The proposed wind farm connection to the national grid will be by either overhead or underground connection.*" Can it be assumed that the two overhead connections identified above, will not be required as underground cables, due to the wind farm?

Power supply for wind turbines
Has underground cabling been planned for the turbines and would they run across the potential pipeline trench?

Construction Compound:
There is a construction compound and a potential connection point to the north east of the proposed Derrybrennan bog at Ballynakill Lower that is outside the proposed wind farm boundary. While sufficient access to the construction compound will be required during the construction period, access to any connection point would need to be maintained as a long term priority.

Access tracks/roads:
Temporary roads will be constructed during the construction phase of the proposed pipeline. Indeed, the location of some the pipelines operational valves may be accessed from the tracks required for the wind farm. Potential benefits to both projects regarding temporary and permanent roads.

Attenuation
There is a proposed attenuation location in the centre of the proposed wind farm site, adjacent to the River Figile.
This may need to be considered as part of the cumulative hydrological impacts of the wind farm EIAR.

Telecommunications inference
SCADA Telemetry using digital radio would be used at line valves, with the potential for interference caused by the wind farm. This could be considered during the telecommunications impact assessment.

Would it be possible to provide a shapefile of the proposal so that we can overlay on our WSP drawings? This will highlight any potential conflicts for further discussion – we would welcome the opportunity to engage directly, particularly in resect of resolving any potential issues swiftly and of identifying opportunities.

Please do not hesitate to contact me should you wish to discuss.

Kind regards

Juliet Ryan
Planning and Compliance Manager – Major Projects

ervia

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Thank you for your attention.

Is don té nó an t-eintiteas chuig a seoltar an fhaisnéis atá an fhaisnéis seo beartaithe agus d'fhéadfadh ábhar faoi rún, atá íogair ó thaobh tráchtála agus/nó faoi phribléid a bheith mar chuid de. Tá cosc ar dhuine ar bith nó ar eintiteas ar bith seachas an té chuig a raibh sí beartaithe, an fhaisnéis seo a athbhreithniú, a athsheoladh, a scaipeadh nó aon úsáid eile a bhaint aisti, nó gníomh a ghlacadh bunaithe uirthi agus d'fhéadfadh sin a bheith in aghaidh an dlí. Ní ghlacfaidh Ervia aon fhreagracht maidir le gníomhartha nó iarmhairtí a bheadh bunaithe ar úsáid thoirmiscthe na faisnéise seo. Ní bheidh Ervia freagrach maidir le seachadadh cuí ná iomlán na faisnéise atá sa chumarsáid seo ná maidir le haon mhoill a bhainfeadh lena fáil. Má fuair tú an teachtaireacht seo trí dhearmad, déan teagmháil le do thoil leis an té a sheol í agus scrios an t-ábhar de gach ríomhaire.

D'fhéadfadh truailliú sonraí, idircheapadh agus leasú neamhúdaraithe tarlú do ríomhphost. Ní ghlacfaidh Ervia aon fhreagracht maidir le hathruithe nó idirghabháil a dhéantar ar an ríomhphost ó bheidh sé seolta nó maidir le haon damáiste a dhéanfadh an teachtaireacht seo nó na ceangaltáin leis do chórais nó do shonraí an té a fhaigheann é. Tabhair ar aird le do thoil go bhféadfadh monatóireacht a bheith á déanamh ar theachtaireachtaí chuig Ervia nó uaidh chun a chinntiú go bhfuiltear ag comhlíonadh caighdeáin agus beartais Ervia agus chun ár ngnó a chosaint. Is comhlacht corparáideach é Ervia (Bord Gáis Éireann roimhe seo) a bunaíodh faoin Acht Gáis 1976.

Go raibh maith agat as d'aird a thabhairt.

Shaun Doolin

From: planning applications <planning.applications@failteireland.ie>
Sent: Tuesday 16 February 2021 11:59
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Fáilte Ireland EIAR Guidelines.pdf

Hello Karen,

Thank you for your email. Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed Wind Farm at Ballydermot, Co. Offlay & Co. Kildare.
The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards,

Yvonne

Yvonne Jackson
Product Development Environment & Planning Support | Fáilte Ireland
Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86
T +353 (0)1 884 7224 | **M** +353 (0) 860357590 | **www.failteireland.ie**



From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 2 February 2021 10:56
To: Yvonne Jackson <Yvonne.Jackson@failteireland.ie>; planning applications <planning.applications@failteireland.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the

development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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Shaun Doolin

From: Trish Smullen <Trish.Smullen@gsi.ie>
Sent: Wednesday 10 February 2021 09:44
To: Karen Mulryan
Cc: Clare Glanville; John Butler
Subject: Re: EIS 21/33 - Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co Offaly & Co Kildare
Attachments: 21_33 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot Co. Offaly & Co. Kildare.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Karen,

With reference to your email dated 09 February 2021, concerning the proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare, please find attached response from Geological Survey Ireland.

We are carrying out a review of our responses and would welcome your feedback (by direct email to clare.glanville@gsi.ie). Please take a moment to answer the three short questions below:

Did this response address your query?
Was the content easily understandable?
Was there anything new to you in the content?

Your responses will be used for internal information purposes only.

If you have any further queries or if we can be of further assistance, please do not hesitate to contact me (Trish.Smullen@gsi.ie), or my colleague Clare Glanville (Clare.Glanville@gsi.ie).

Yours sincerely,

Trish Smullen
Geological Survey Ireland

From: John Butler
Sent: 02 February 2021 16:04
To: Clare Glanville; Sophie O'Connor; Brian McConnell; Monica Lee; Taly Hunter Williams; Sean Cullen; Charise McKeon; Jim Hodgson; Eoin McGrath; Trish Smullen
Subject: EIS 21/33 - Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co Offaly & Co Kildare

EIS 21/33

Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co Offaly & Co Kildare. Request for observations by McCarthy Keville O'Sullivan. Scoping document is enclosed.

Regards,

John

From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: 02 February 2021 15:33
To: Clare Glanville
Cc: John Butler
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good afternoon Clare,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.
The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

An Roinn Comhshaoil,
Aeráide agus Cumarsáide
Department of the Environment,
Climate and Communications

Geological Survey
Suirbhéireacht Gheolaíochta
Ireland | Éireann

Karen Mulryan
MKO
Tuam Road,
Galway
H91 VW84

10 February 2021

Re: Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Your Ref: 191136
Our Ref: 21/33

Geological Survey Ireland is the national earth science agency and has datasets including Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources, Geohazards and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our website for data availability and we recommend using these various data sets, when undergoing the EIAR, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

Dear Karen,

With reference to your email dated 09 February 2021, concerning the proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare, Geological Survey Ireland (a division of the Department of the Environment, Climate and Communications) would like to make the following comments.

Geoheritage

Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS, Department of Housing, Local Government and Heritage), to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme of Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGS), as adopted under the National Heritage Plan, include additional sites that may also be of national importance, but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by GSI are categorised as CGS pending any further NHA designation by NPWS. CGS are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer.

The audits for Co. Kildare and Co. Offaly were carried out in 2005 and 2016 respectively. The full report details can be found at The Geological Heritage of Kildare and The Geological Heritage of Offaly. **Our records show that there are no CGSs in the vicinity of the proposed wind farm.**

Groundwater

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected.

Geological Survey Ireland's Groundwater Programme, provides advice and maps relating to groundwater quality, quantity and distribution to members of the public, consultancies and public bodies. The Groundwater Programme monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies.

Our Groundwater programme run GWClimate which is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Groundwater Programme maps and data are available on the Map viewer.

Geological Mapping

Geological Survey Ireland (GSI) maintains online datasets of bedrock and subsoils geological mapping that is reliable, accessible and meets the requirements of all users including depth to bedrock and physiographic maps. These datasets include depth to bedrock data and subsoil classifications. We would encourage you to use these data which can be found here, in your future assessments.

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. Geological Survey Ireland has information available on past landslides for viewing as a layer on our Map Viewer. Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and GWFlood Groundwater Flooding. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities.

Geotechnical Database Resources

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our Geotechnical Map Viewer. We would encourage the use of this database as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of proposed development areas. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the project.

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. Should any significant bedrock cuttings be created, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland to personally document exposures could also be arranged.

The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo, Land Mapping Unit, at Beatriz.Mozo@gsi.ie, 01-678 2795.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me (Trish.Smullen@gsi.ie), or my colleague Clare Glanville (Clare.Glanville@gsi.ie).

Yours sincerely,



Trish Smullen
Geoheritage Programme
Geological Survey Ireland

Shaun Doolin

From: MKO-Admin
Sent: Friday 12 February 2021 11:21
To: Karen Mulryan
Subject: FW: 191136
Attachments: Ballydermot Windfarm Co Offaly Kildare Scoping EHIS 1584.pdf

---

From: Margaret Byrne <margaret.byrne3@hse.ie>
Sent: Friday 12 February 2021 11:02
To: MKO-Admin <info@mkoireland.ie>
Subject: ref:191136

Please find attached Environmental Health Submission regarding Ballydermot Windfarm Co. Offaly ref: 191136

Kind Regards
Margaret Byrne
Senior Environmental Health Officer

#dia duit Is mise....
Margaret Byrne | Seirbhís Sláinte Chomhshaoil | An Chrosairí, | Bóthar Bhaile Átha Cliath | An Nás | Co. Chill Dara

Margaret.byrne3@hse.ie 045920208

#hello my name is...

Margaret Byrne | Environmental Health Service | The Crossings | Dublin Rd | Naas | Co. Kildare. | Eircode: W91 DK74

Need information and advice on COVID-19? Go to www.hse.ie/coronavirus

"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil . Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúil don Deasc Seirbhísí ECT ar an nguthán ag +353 818 300300 nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

The Crossings
Dublin Road
Naas
Co. Kildare

Tel: (045) 920208
Tel: (045) 920267
Fax:(045) 871864

Date: 4 March 2021

Name: Ms Karen Mulryan, MKO, Tuam Road, Galway

Consultant's reference: 191136

Re: EIA Scoping Report

Proposed development: Proposed Ballydermot Wind Farm, Co. Kildare/ Offaly

Applicant: Bord na Mona Powergen Ltd

EHIS Reference: 1584

Dear Ms Mulryan

Please find enclosed the HSE Consultation Report in relation to the above proposal. The following HSE departments were made aware of the consultation request for the proposed development on 5 February 2021

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/ Laura Murphy
- CHO – Anne O'Shea

If you have any queries regarding this report the initial point of contact is Ms Marie Matthews, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours sincerely,

Marie Matthews
Principal Environmental Health Officer

HSE EIA Scoping

Environmental Health Service Submission Report

Date: 4 March 2021

Our reference: EHIS 1584

Report to: Ms Karen Mulryan, MKO, Tuam Road, Galway

Consultant's reference: 191136

Type of Consultation: EIA Scoping

Proposed development: Bord na Mona Powergen Ltd Windfarm Development, Ballydermot,
Co. Offaly/Kildare

Applicant: Bord na Mona Powergen Ltd

Proposed Development: A wind energy development comprising 50-60 turbines with an output of at least over 50 megawatts. The proposed development will be located on 14 bogs at Ballydermot and will be known as Ballydermot Wind Farm.

General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

http://www.epa.ie/pubs/consultation/reviewofdrafteisguidelinesadvicenotes

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

a) Description of the receiving environment;

b) The nature and scale of the impact;

c) An assessment of the significance of the impact;

d) Proposed mitigation measures;

e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the SID/ planning application and will make comments to the relevant planning authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 28th January 2021.

The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR

• Public Consultation

• Decommissioning phase**.**

• Siting and location of turbines

• Opportunity for Health Gain

• Noise & Vibration

• Shadow Flicker

• Air Quality

• Surface and Groundwater Quality

• Geological Impacts

• Ancillary facilities

• Cumulative impacts

Public Consultation

It is strongly recommended that early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed.

All parties affected by the proposed development, **including those who may benefit financially from the project,** must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed wind farm development in the future.

It is acknowledged that current restrictions around public gatherings as a result of Covid 19 prevention measures will impact on opportunities for public consultation events. However it is expected that meaningful public consultation, where the local community is fully informed of the proposed development, will be undertaken. Members of the public should be given sufficient opportunities to express their views on the proposal wind farm.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision making process in the EIA.

To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed wind energy project. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website.

The Environmental Health Service would prefer to receive planning and EIAR documentation electronically by USB if possible.

Decommissioning Phase

The proposed development should have a clear life span and the EIAR should indicate the estimated operational phase of the wind farm, how and when it will be decommissioned and any proposals for the future use of the site. Information should be included on the use of decommissioned materials (rotor blades, nacelle and tower) and on proposals for the removal, disposal or otherwise of the foundations

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines.

The Environmental Health Service expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR.

Details of turbine foundation structures, including depth, quantity and material to be used should be included in the EIAR.

Opportunity for Health Gain

The EPA has issued guidance with regard to meeting the requirements of Directive 2014/52/EU which assesses the impact of certain public and private projects on the environment. The proposed development should be assessed with a view to the potential to include opportunities for health gain within the site of the proposed wind farm by including greenways, cycle-paths or walking trails within the development site.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The EHS recommends that alternative renewable energy options to on shore wind farms should be assessed as part of the EIAR.

Noise & Vibration

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration.

A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the back ground levels.

In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed wind farm development must be undertaken which details the change in the noise environment resulting from the proposed wind farm development.

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

Shadow Flicker

It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment.

It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker.

Air Quality

Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures. Measures should include:

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads
- Wheel washing facilities at site exit
- Restrict speed on site

- Provide covers to all delivery trucks to minimise dust generation
- Inspect and clean public roads in the vicinity if necessary
- Material stockpiling provided with adequate protection from the wind
- Dust monitoring at the site boundary
- Truck inspection and maintenance plan
- Details of a road maintenance agreement between the wind farm operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified. Measures to ensure that all sources and supplies are protected should be described. The Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes.

Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.

Geological impacts

A detailed assessment of the current ground stability of the site for the proposed wind farm and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion.

Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information.

Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on November 13th 2020 which may have been linked to construction activity at Meenbog Wind Farm. Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels.

The Environmental Health Service recommends that a detailed Peat Stability Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)
https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf

Ancillary Facilities

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

Cumulative Impacts

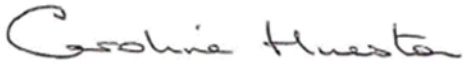
All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

The impact on sensitive receptors of the proposed development combined with any other wind farm developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.

The EIAR should state clearly if there is any future proposal to extend the proposed Ballydermot Wind Farm.



Margaret Byrne
Senior Environmental Health Officer
The Crossings
Dublin Road
Naas
Co. Kildare



Caroline Hueston
Environmental Health Officer
Environment Operational Unit
HSE West

Ennistymon Health Centre
Ennistymon
Co. Clare

Shaun Doolin

From: MKO-Admin
Sent: Monday 22 March 2021 17:04
To: Karen Mulryan
Subject: FW: Scoping of Wind Farm Ballydermot Ref 191136
Attachments: HSE_sub BallydermotWindfarm Bord na Mona Powergen Limited ID1624.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

From: Sulley, Andrew <andrew.sulley@hse.ie>
Sent: Monday 22 March 2021 17:03
To: MKO-Admin <info@mkoireland.ie>
Subject: Scoping of Wind Farm Ballydermot Ref 191136

FAO Karen Mulryan

Dear Ms Mulryan,

Please find enclosed some comments by the Environmental Health Service on the scoping of the EIA for the proposed Ballydermot WF, Kildare/Offaly. Your reference 191136.

We received a request from the EPA to contribute to their response to you on the scoping of this proposal but I have notified them that I have responded directly to you.

This response includes consultation with other HSE stakeholders prior to our response being made and can be considered a HSE response. No additional comments were made at this stage by other Departments within the HSE. They will be consulted again at full application stage.

If you need to clarify any aspects of this e-mail then you can contact me on 087 2913740

Regards

Andrew Sulley

Environment Operational Unit

Andrew.sulley@hse.ie

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An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2

T: 045 880 442
ehnationaloffice@hse.ie

HSE EIA Scoping

Environmental Health Service Submission Report

Date: 12th March 2021

Our reference: EHIS 1624

Report to: MKO Consulting

Type of Consultation: EIA Scoping

Proposed development: Wind Farm Ballydermot, Co. Offaly/Kildare

Applicant: **Bord Na Mona Powergen Ltd**

The Scoping document dated 25th January 2021 was circulated to the following HSE stakeholders on the 25th February 2021:

- **Emergency Planning – Brendan Lawlor**
- **Estates – Helen Maher**
- **Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy**
- **CHO – Anne O 'Shea**

General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report:

- Guidelines on the information to be contained in EIS (2002), 187kb
- Advice Notes on Current Practice in the preparation of EIS (2003), 435kb
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the above guidelines. The draft new guidelines can be seen at:

http://www.epa.ie/pubs/consultation/reviewofdrafteisguidelinesadvicenotes

Generally the Environmental Impact Assessment should examine all likely significant impacts and provide the following information for each:

a) Description of the receiving environment;

b) The nature and scale of the impact;

c) An assessment of the significance of the impact;

d) Proposed mitigation measures;

e) Residual impacts.

Directive 2014/52/EU has an enhanced requirement to assess likely significant impacts on Population and Human Health. It is the experience of the Environmental Health Service (EHS) that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

In addition to any likely significant negative impacts from the proposed development, any positive likely significant impacts should also be assessed.

The HSE will consider the final EIAR accompanying the planning application and will make comments to the relevant planning authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 21st January 2021 as a scoping document.

The Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIA

- Public Consultation
- Decommissioning phase
- Siting and location of turbines
- Opportunity for Health Gain
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Geological Impacts
- Ancillary facilities and cumulative impacts

Public Consultation

It is strongly recommended that early and meaningful public consultation with the local community is carried out to ensure all potentially significant impacts have been adequately addressed.

All parties affected by the proposed development, **including those who may benefit financially from the project,** must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed wind farm development in the future.

It is acknowledged that current restrictions around public gatherings as a result of Covid 19 prevention measures will impact on opportunities for public consultation events. However it is expected that meaningful public consultation, where the local community is fully informed of the proposed development, will be undertaken. Members of the public should be given sufficient opportunities to express their views on the proposal wind farm.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA.

To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed wind energy project. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website.

Decommissioning Phase

The EIAR should detail what the eventual fate of the turbines and associated material will be, i.e. will the material be recycled or how will it be disposed of.

Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines.

The EIAR should indicate the proposed future use of the wind farm site at the end of the planning permission period.

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines.

The Environmental Health Service expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR.

Details of turbine foundation structures, including depth, quantity and material to be used should also be included in the EIAR.

Opportunity for Health Gain

The EPA has issued guidance with regard to meeting the requirements of Directive 2014/52/EU which assesses the impact of certain public and private projects on the environment. The proposed development should be assessed with a view to the potential to include opportunities for health gain within the site of the proposed wind farm by including greenways, cycle-paths or walking trails within the development site.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The EHS recommends that alternative renewable energy options to on shore wind farms should be assessed as part of the EIAR.

Noise & Vibration

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration.

A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing turbines in the area should not be included as part of the back ground levels.

In addition, an assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed wind farm development must be undertaken which details the change in the noise environment resulting from the proposed wind farm development.

It is the experience of the EHS that a noise assessment that compares noise against an absolute noise exposure limit does not adequately predict the likely significant impact. The predicted change in the existing noise environment is the most informative method of predicting likely significant impacts.

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf

It is recommended that the transformer proposed as part of the development is manufactured with a specified and guaranteed noise emission level in order to minimise the impact on sensitive receptors and that the minimising of noise is a criterion used for the selection and installation of substation equipment.

Shadow Flicker

It is recommended that a shadow flicker assessment is undertaken to identify any dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures. Dwellings should include all occupied properties and any existing or proposed properties for which planning consent has been granted for construction or refurbishment.

It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result no dwelling should be exposed to shadow flicker.

Air Quality

Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures. Measures should include:

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads
- Wheel washing facilities at site exit
- Restrict speed on site
- Provide covers to all delivery trucks to minimise dust generation
- Inspect and clean public roads in the vicinity if necessary
- Material stockpiling provided with adequate protection from the wind
- Dust monitoring at the site boundary
- Truck inspection and maintenance plan
- Details of a road maintenance agreement between the wind farm operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

The proposed development has the potential to have a significant impact on the quality of both surface and ground water. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified. Measures to ensure that all sources and supplies are protected should be described. The Environmental Health Service recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes.

Any potential significant impacts to drinking water sources should be assessed. Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and any proposed mitigation measures.

Geological impacts

A detailed assessment of the current ground stability of the site for the proposed wind farm and all proposed mitigation measures should be detailed in the EIAR. The assessment should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion.

Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information.

Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on November 13th 2020 which may have been linked to construction activity at Meenbog Wind Farm. Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels.

The Environmental Health Service recommends that a detailed Peat Stability Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017) https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf

Ancillary Facilities

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

Waste Management

The EIAR should include a waste management plan based on the waste hierarchy.

Cumulative Impacts

All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

The impact on sensitive receptors of the proposed development combined with any other wind farm developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.

The EIAR should state clearly if there is any future proposal to extend the proposed Wind Farm.

Any clarification on the content of this submission should be directed to:

Andrew.sulley@hse.ie



Shaun Doolin

From: MKO-Admin
Sent: Wednesday 10 March 2021 12:34
To: Karen Mulryan
Subject: FW: IFI submission re EIAR re Ballydermot Windfarm by Bord na Mona Powergen Ltd, Counties Kildare and Offaly For attention Karen Mulryan
Attachments: IFI submission to Ballydermot Windfarm EIAR scoping Kildare Offaly, Figile & slate systems.docx

Follow Up Flag: Follow up
Flag Status: Flagged

From: Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>
Sent: Wednesday 10 March 2021 11:23
To: MKO-Admin <info@mkoireland.ie>
Subject: IFI submission re EIAR re Ballydermot Windfarm by Bord na Mona Powergen Ltd, Counties Kildare and Offaly For attention Karen Mulryan

Dear Sir/Madam,

Please see attached a copy of the IFI submission relating to the above.

Yours faithfully

Donnachadh Byrne
Senior Fisheries Environmental Officer

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel +353 (0)1 8842600
Email donnachadh.byrne@fisheriesireland.ie
Web www.fisheriesireland.ie
3044 Lake Drive, Citywest Business Campus, Dublin 24, Ireland.

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D'fhéadfaí go bhfuil an ríomhphost seo agus ceangaltáin ar bith atá in éineacht leis faoi rún agus iad beartaithe d'úsáid an duine a bhfuil a s(h)eoladh air amháin. Dearcthaí nó tuairimí ar bith atá curtha in iúl ann, baineann siad leis an údar amháin, agus ní chaithfidh go n-aontaíonn Iascaigh Intíre Éireann leo. Mura tusa faighteoir beartaithe an ríomhphoist seo, ná déan rud ar bith mar gheall ar an méid atá ann, ná é a chóipeáil ná é a thaispeáint do dhuine ar bith eile. Déan teagmháil leis an seoltóir, le do thoil, má chreideann tú go bhfuair tú an ríomhphost seo trí earráid.

Karen Mulryan
MKO, Environmental Consultants
Tuam Road
Galway
H91VW84

08 March 2021

Applications by Bord na Mona Powergen Ltd for a windfarm development at Ballydermot, Counties Kildare and Offaly.

Dear Sir,

IFI is charged with the protection, conservation and promotion of fisheries within our functional area. Board policy is aimed at maintaining a sustainable fisheries resource through preserving the productive capacity of fish habitat by avoiding habitat loss, or mitigating harmful alteration to habitat.

The site of this significant proposed development is located primarily within the Figile and Slate River catchments, both of which are tributaries of the Barrow SAC system.

The Barrow River is an important Spring Salmon & trout fishery and supports several species listed in Annex II of the Directive including Salmon, River Lamprey, Brook Lamprey, Sea Lamprey, Freshwater Pearl Mussel and Otter. Much of the main channel of the Barrow River and many tributaries are candidate Special Areas for Conservation (SAC) under the European Habitats Directive.
The Figile and Slate River are two of the four tributaries (Figile, Cushina, Philipstown/Daingean & Slate), draining large peatland areas which combined are known as the Black River system. The Black River is by far the largest tributary of the Barrow system draining, 622km^2 and represents 21% of the entire Barrow catchment.
Salmon spawning/recruitment within the Black River is currently limited to small sections of the Slate and Cushina rivers. Until relatively recently however salmon spawning/recruitment in the Black River occurred over a far wider range, with important salmon spawning in the Esker River (Daingean tributary) and throughout much of the Slate Rivers, while much of the Figile River has excellent salmonid habitat/habitat potential.
IFI believe that the restoration of salmon spawning recruitment throughout the Black River is integral to improving salmon stocks in the Barrow SAC.

The Barrow is one of Ireland's largest salmonid systems and its importance to populations of species and habitat types listed in the European Habitats Directive is recognized by the fact that much of the main channel and many tributaries have been designated as candidate Special Areas for Conservation (SAC) under the European Habitats Directive.
Adult salmon spawn in shallow waters during the Winter months and the adult salmon that spawn in systems such as the Black River will have resided in deeper sections of the Barrow main channel prior to entering the Black River system to spawn. Conversely the progeny of the salmon that spawn in the Black River system as they grow older and larger will travel downstream to the deeper waters of the Barrow main channel, before smoltifying and migrating to sea. IFI would like to stress that the populations of

salmon (and other Habitats Directive species) in the Black River systems are an important/integral component of the salmon populations of the Barrow River SAC even though the Black River is not SAC designated.
To reinforce this point, the most important salmon spawning/nursery tributary on the entire Barrow system is the Greese River which flows through Counties Wicklow and Kildare.
When the decision on which tributaries of the Barrow were to be designated as an SAC was being made, serious water quality issues in the Greese, from a number of point source discharges in the upper reaches meant that salmon production in this system was limited and for that reason the Greese was not SAC designated. Since then however, there have been significant improvements in water quality in the Greese and it is now the most important salmon spawning and nursery tributary of the Barrow system even though it is not SAC designated.

IFI's main concerns relating to this development can be broken down under two different headings.

1. Serious water quality and habitat/hydro-morphological issues that persist throughout the Figile and Slate River system linked to peat extraction operations by Bord na Mona. Of concern is the potential that this proposed development may consolidate these water quality and hydro-morphological issues.
2. Direct impacts upon water quality/quantity related to the construction/operation phase.

IFI concerns relating to water quality and habitat/hydro-morphological issues that persist throughout the Figile and Slate River systems linked to peat extraction and the potential that this proposed development may consolidate these serious issues, include:

- The WFD Ecological Status/Potential for numerous waters draining Bord na Mona peatland areas throughout the Black River system is "Poor", while for many the WFD Risk calculation is that they are "At Risk".
- The WFD Characterization Reports for numerous waters throughout the Black River system draining peatland areas identifies peat extraction as a significant pressure, with organic pollution the main impact associated with peat extraction.
- To facilitate peat harvesting deep drainage channels were constructed throughout peatland sites. Deepening of fisheries water-courses adjacent to and downstream of peatlands was also undertaken to facilitate this peat harvesting. These significant alterations lowered the water table within surrounding peat deposits and result in the associated peat being exposed to air, facilitating the rapid breakdown of this organic matter, releasing nutrients, principally ammonia to waters.
- The drying out of the peats exacerbates the washout of peat solids to surface waters. The potential for peat particles to become windblown is exacerbated by drying out also.
- Silt settlement ponds are used extensively on Bord na Mona properties, but are likely to retain heavier suspended solids only, with limited retention of dissolved nutrients. The ability of a silt settlement pond to retain fine particles depends upon regular maintenance, as it relates to residence time within the pond and as suspended solids settle out in the pond the retention time for water within that cell and the efficiency of the system reduces significantly. The efficiencies of these ponds in relation to their retention time needs to be considered, with a specific focus upon periods of high precipitation.
- Suspended solids pollution of surface waters from worked peatland areas is not limited to carry-over from silt settlement ponds, but occurs as a result of direct run-off from haul roads and

stockpiles of peat. Wind-blown peat is another significant source. The potential for suspended solids generation from excavations in subsoils below peat deposits should also be considered.

- To date the main water protection/mitigation measure employed by Bord na Mona at peatland sites is the use of silt ponds. Silt ponds do not address the threat of ammonia pollution from working/cut-over peatland areas.
- Peat extraction requires the drainage/pumping of waters from relatively shallow peat deposits. Of concern to IFI is the potential that the temperatures of this drainage water may (at certain times of the year) be significantly elevated when compared to typical groundwater recharge and/or the surface waters to which it is being discharged.
- Following on from the above point, this drainage water is likely to flow through a large drainage system which may include multiple, large surface area silt settlement ponds. Given the relatively shallow depth of the silt ponds and potential for full sunlight penetration, IFI have concerns that there is potential for a significant increase in temperatures of this drainage water prior to discharge to surface waters.
- Given the important link between water temperature and biological/biochemical reactions, the temperature of drainage waters being discharged to fisheries streams/rivers is critical in that some key constituents of water, either change their form (ionization of ammonia) or alter their concentration, as with dissolved oxygen. Considering that ammonia losses from drained peatland are the principal water quality issue it is important that this issue be adequately addressed.
- An examination of OSI 6 & 25 inch sheets highlight significant modifications to watercourses flowing through, adjacent to and downstream of the peatland sites in the Black River catchment. The modifications noted (through both desktop checks and on-site visits) included:
    - Realignment/Straightening
    - Deepening
    - Widening
    - Culverting/piping of waters
    - Construction of on-line silt ponds to facilitate commercial peat extraction.
    - Differences in height where waters are lifted to facilitate drainage
- Realignment/straightening of watercourses is problematic for a number of reasons including the fact that it results in a net loss of habitat. Realignment of channels often results in a highly degraded hydro-morphology with the loss of natural sinuosity and natural instream variation characterized by the pool/glide/riffle sequence. Realignment may also negatively impact upon gravel recruitment at the realigned site and in waters downstream.
- The deepening of watercourses in, or adjacent to peatland sites, (in addition to the release of ammonia and suspended solids to surface waters) may result in the removal of all/most gravels from long stretches of fisheries waters where the excavation depth extends down to the subsoils beneath the watercourse. In such cases the potential for natural restoration in waters flowing through peatland areas is limited, given the relatively low gradient and other hydro-morphological issues referred to in the above point. **Significant human intervention is likely to be necessary to facilitate recovery of the fisheries habitat on long stretches of watercourses draining peatland areas in the Black River catchment.**
- The widening of watercourses, (regularly associated with realignment and deepening) often results in a highly degraded hydro-morphology with the loss of natural sinuosity and natural instream variation characterized by the pool/glide/riffle sequence. In shallow waters a braided channel with limited depth for fish to reside is often the result, while in deeper waters an over-abundance of aquatic plants clogging the channel is regularly encountered.

- Culverting is potentially damaging to fisheries waters as it may (1) block/impede the free passage of fish, (2) result in a loss of fisheries habitat and (3) hinder the detection of pollution. Our experience is that many of the culverts on Bord na Mona peatlands to facilitate the industrial light rail system are very long. The depth at which such culverts were installed also acts as a control re drying out of peats, as all peats upstream of the culvert at a higher elevation will be subject to drying out.
- Construction of on-line silt ponds results in a loss/degradation of fisheries habitat. The efficacy of any silt pond relates to residence time in the pond and as peat settles out in the pond the ability for the pond to retain peat is reduced. Because of this, these ponds are subject to regular maintenance whereby accumulated peat deposits are removed.
- IFI have noted significant gradient differences on watercourses on peatland sites within these catchments where water is lifted from one to the other using archimidean screw technology. Such practices also represent a barrier to the free passage of fish.
- The water quality and habitat/hydro-morphological issues throughout the Black River system linked to peat extraction and discussed above are numerous and significant. Compliance with the European Water Framework Directive will mean a significant programme of works including measures to address these water quality and habitat/hydro-morphological issues be drawn up and implemented. The development of this facility should be considered only in line with a catchment wide programme throughout the Figile and Slate River to address the numerous issues discussed above.

IFI concerns relating to water quality/quality and concerns linked to the construction development phase include:

- This proposed development is likely to include the clearance of huge areas of peatland habitat/peat. The clearance of this material will act to increase the rate at which water is drawn toward these excavations and will also further dry out surrounding peat-lands thereby increasing ammonia run-off. We ask how the applicant proposes to address this issue.
- Regarding the physical clearance and excavation of peat habitat, mitigation measures which are limited to the control of suspended solids pollution will not address the threat from dissolved nutrients such as ammonia.
- We request that the applicant address the root cause of the elevated ammonia concentrations in surface waters/pumped waters that require treatment on-site.
- All surface waters from the site and access roads should be channeled through adequately sized petrol/oil interceptors prior and be subject to attenuation prior to discharge to surface waters.
- Given the proximity of surface waters draining to the Barrow system the pollution threat from concrete and concrete/cement washings is significant. Good housekeeping is of the utmost importance while using concrete or cement, near watercourses.
- Uncured concrete can kill fish and macro-invertebrates by altering the pH of the water. Concrete delivery vehicles should be precluded from washing out at or in the environs of the site, or at such location as would result in a discharge to surface waters.
- We would also point out that passage of waters (that have come into contact with uncured concrete and have an elevated pH), through silt ponds does not represent adequate treatment.
- If bagged cement is stored on site during construction work, it should be held in a dry secure area when not in use.
- One of the potential impacts of the proposed development is the discharge of silt-laden waters to fisheries streams where earth moving and excavation works are on-going. Silt can clog

salmonid spawning beds, and juvenile salmonids are particularly sensitive to siltation of gill structures. Similarly, plant and macro-invertebrate communities can literally be blanketed over, and this can lead to loss or degradation of valuable habitat.

- It is important to incorporate best practices into construction methods and strategies to minimise discharges of silt/suspended solids to waters.
- The potential for soil erosion/suspended solids generation is higher, during/after periods of prolonged rainfall. We ask that this be addressed.
- Systems should be put in place to ensure that there shall be no discharge of suspended solids or any other deleterious matter to watercourses during the construction/operational phase and during any landscaping works.
- Stockpiles of sand to be used in the works should be covered with sheeting when not in use to prevent washout of fines during rainfall. Stockpiles of topsoil and associated materials arising during site development should be similarly protected.
- A comprehensive plan should be drawn up at the planning stage with specific measures to address the high potential for silt pollution of the watercourse on-site during construction and landscaping works.
- All oils and fuels should be stored in secure bunded areas, and particular care and attention should be taken during refuelling and maintenance operations on plant and equipment.
- Bunding should be to a volume not less than the greater of the following; 110% of the capacity of the largest tank or drum within the bunded area, or 25% of the total volume of substance that could be stored within the bunded area.
- All plant and equipment should carry oil/fuel spill kits. Where temporary diesel or petrol driven pumps are required, they should be sited within portable temporary bunded units. Where site works involve the discharges of drainage water to receiving rivers and streams, temporary oil interceptor facilities should be installed and maintained.
- Waste oils, empty oil containers and other hazardous wastes should be disposed of in accordance with the requirements of the Waste Management Act, 1996.
- No instream works shall be carried out without the written approval of Inland Fisheries Ireland.

The applicant refers to Ireland's Climate Action Plan 2019. IFI have reviewed the 2019 Climate Action Plan, chapter 1 of which details the critical nature of the challenges, highlighting that average temperatures have risen, oceanic warming, a rise in sea levels, with predictions of further warming and changes to our climate, with extensive direct and indirect harm to Ireland and its people.

The Action Plan details numerous impacts which will cause harm, including:

- Further pressure on water resources, with impacts upon fluvial ecosystems
- More intense storms and rainfall
- Increase chance and scale of river flooding
- Heightened risk of the arrival of new pest and diseases
- Poorer water quality
- Changes in the distribution and time of lifecycle events of plants and animal species

All the above pressures will impact significantly upon the viability of populations of native fish species such as salmon, trout, lamprey and eel in rivers throughout Ireland in the future and IFI welcome the fact that these impacts have been highlighted in this document.
It is clear to IFI that the protection of and long-term viability of ecosystems and populations of protected species is integral to the Climate Action Plan 2019.

As stated above salmon spawning/recruitment within the Black River catchment is currently limited to small sections of the Slate and Cushina rivers.
Until relatively recently however salmon spawning/recruitment in the Black River occurred over a far wider range, the main reason for the reduction relates to channel modification and water pollution associated with the development of commercial peat production throughout this catchment.
IFI believe that the restoration of salmon spawning recruitment throughout the Black River is integral to improving salmon stocks in the Barrow SAC however significant human intervention is likely to be necessary to facilitate recovery of the fisheries habitat on long stretches of these watercourses.

It is clear that Bord na Mona sees wind-farm development as the long-term change of use for peatland areas over much of the Bog of Allen, in large part to fulfill the requirements of the Climate Change Action Plan 2019. Integral to the Climate Action Plan 2019 is the long-term viability of ecosystems and populations of protected species. Unfortunately, populations of such protected species are very low/absent over large sections of the Black River catchment due to habitat damage/water quality issues associated with the previous use of these landholdings by Bord na Mona. And we believe that issues related to this should be addressed in line with the change of use of these sites by Bord na Mona.

IFI is keen to build on recent water quality improvements in the Black River, which drains 21% of the Barrow River catchment and to restore and increase populations of salmon and other native fish species over large sections of this system. Existing populations within the Black River are an integral component of the Barrow River SAC populations of these species and as these populations expand in numbers and range their importance will increase significantly.
IFI believe that the implementation of restoration plan/plans, throughout the Figile/Black River catchment to address the water quality & hydro-morphological issues referred to above, is integral to the restoration of populations of salmon & other species for which the Barrow River was SAC designated.
In addition the implementation of such a plan will also be central to Ireland's requirements for the implementation of the requirements of the Water Framework Directive.

IFI welcome the Bord na Mona, Biodiversity Action Plan 2016-2021 statement that "*the main aim of rehabilitation will be to re-wet former production areas as much as possible to maximize the benefits for biodiversity and carbon*".
IFI request that applicant include a commitment to river habitat restoration throughout the Figile and Slate systems which drain the large cut-over peatland areas where this development is proposed.

Yours faithfully,

Donnachadh Byrne
Senior Fisheries Environmental Officer

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24

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MKO
Received on
16 FEB 2021
191136
Karen Mulryan

Date 15th February 2021

Ms. Karen Mulryan
MKO
Tuam Road
Co Galway
H91 VW84

***Development*: Wind Farm development at Ballydermot Co Offaly Kildare The proposed project will likely encompass 50-60 turbines and will have an output of al least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeala seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development at The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. Ref: 191136.**

Dear Ms. Mulryan,

Thank you for your email in relation to the EIA Scoping for the proposed Bord Na Mona Powergen Ltd WF development at Ballydermot, Co. Offaly/Kildare.

It is noted that the proposed development is approximately 4km to the East of the licensed airfield, Clonbullogue Aerodrome.

It is the observation of the Safety Regulation Division – Aerodromes, that even at this pre-planning stage, it would be prudent if the developers would engage as early as possible with the licensees of the aerodrome to make them aware of this proposed development so they may furnish any views with regard to potential impact on their operations at Clonbullogue.

Their contact details, as set out in the Aeronautical Information Publication for Ireland, are as follows:

Post: Irish Parachute Club Ltd

The Airfield
Clonbullogue
Edenderry
Co. Offaly
Phone:1850 260 600
Fax: +353 46 9730204
Email: info@skydive.ie

During the formal planning process, the Safety Regulation Division – Aerodromes will likely make the following general observation:

Bord Stiúrthóirí/Board of Directors
Rose Hynes (Cathaoirleach/Chairman),
Peter Kearney (Príomhfheidhmeannach/Chief Executive)
Cian Blackwell, Marie Bradley, Ernie Donnelly,
Gerry Lumsden, Joan McGrath, Diarmuid Ó Conghaile,
Eimer O'Rourke

Oifig Chláraithe:
Foirgneamh na hAmanna, 11-12 Sráid D'Olier
Baile Atha Cliath 2, D02 T449, Éire
Uimhir Chláraithe: 211082. Áit Chláraithe: Éire
Cuideachta Dliteanais Theoranta

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In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:

(1) agree an aeronautical obstacle warning light scheme for the wind farm development,

(2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location

Turbine No.	*WGS-84 Co-ordinates*	*Ground elevation (Malin Head OD)*	*Blade tip elevation of turbine (Malin Head OD)*	*Height of turbine (height from ground level to blade tip)*	*Confirm if turbine has obstacle lighting.*
T1	53.346125, -6.258288	75m	225m	150m	No

(3) notify the Authority of intention to commence crane operations with a minimum of 30 days prior notification of their erection.'

Yours sincerely

pp.

Deirdre Forrest
Corporate Affairs

Shaun Doolin

From: Planning <planning@iaa.ie>
Sent: Wednesday 10 March 2021 17:39
To: Karen Mulryan
Subject: Wind Farm development at Ballydermot Co Offaly Kildare

Dear Karan

The Irish Aviation Authority (IAA) Air Navigation Services Division (ANSD) does not get involved in the planning process. The IAA ANSD is to be notified as detailed hereafter:

According to S.I. 215 of 2005, Irish Aviation Authority (Obstacles to Aircraft in Flight), the IAA ANSD requires any person who seeks to erect a manmade object to notify the aerodrome operator of the intended operation **at least thirty days** in advance if the structure is to be erected in the vicinity of the aerodrome or the areas around the aerodrome and other protected surfaces associated with the aerodrome. Aerodrome Operators can be contacted via IAA AIP AD 1.3 INDEX TO AERODROMES AND HELIPORTS, to evaluate the impact of the intended operation on the protected airspace established for the aerodrome.

Additionally, any person who seeks to erect a manmade object in excess of 45 metres anywhere within the state above ground or water surface level must also notify the IAA ANSD of the intended crane erection **at least thirty days** in advance, as a crane operating at or above this height may constitute an obstacle to air navigation. The IAA ANSD can be contacted via airspace@iaa.ie.

The State requires electronic terrain and obstacle data (eTOD) in accordance with International Civil Aviation Organisation (ICAO) Annex 15 requirements which shall be surveyed by Ordnance Survey Ireland (OSi). The cost of this OSi surveyed data is to be borne by the developer. Additionally, the following data is to be supplied once construction is planned or commenced or available to the airspace team via airspace@iaa.ie:

- The WGS84 coordinates (In degrees, minutes and seconds) for each turbine?
- Height above ground level (to blade tip) and elevation above mean sea level (to blade tip)?
- Verification if it's a standalone wind farm or is merged with others. Does the wind farm have any alternative names?
- Horizontal extent (rotor diameter) of turbines and blade length where applicable?
- Lighting of the wind farm, which turbine(s) is/are lit, and what type of lighting?

ICAO Light Type	Colour
Low-intensity Type A (fixed obstacle)	Red
Low-intensity Type B (fixed obstacle)	Red
Low-intensity Type C (mobile obstacle)	Yellow/Blue
Low-intensity Type D (follow-me vehicle)	Yellow
Low-intensity Type E	Red
Medium-intensity Type A	White
Medium-intensity Type B	Red
Medium-intensity Type C	Red
High-intensity Type A	White
High-intensity Type B	White

If you have any questions, please don't hesitate to contact the airspace team at airspace@iaa.ie.

Kind regards,

Audrey Rafferty
Corporate Affairs
Irish Aviation Authority
11-12 Dolier Street
Dublin 2
01 603 1103

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IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA hÉIREANN

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Tel/*Teil*: +353-(0)45-860133
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web/*idirlíon*: www.ipcc.ie

Bord na Móna Powergen
Main Street
Newbridge
Co. Kildare

18th January 2021

RE:Proposed Ballydermot Windfarm, Co. Kildare

Dear Powergen/Ballydermot Windfarm Project Team,

Thank you for including the Irish Peatland Conservation Council (IPCC) as a consultee on the proposed Ballydermot Windfarm.

The Bog of Allen was originally ~100,000ha and blanketed much of the east of the Republic. The study area for the proposed Ballydermot Windfarm was once a large complex of raised bog and associated habitats within the Bog of Allen. Its decimation has had massive effects on the local indigenous wildlife. The blatant disregard for the natural landscape through intensive extraction of peat for energy and horticulture has contributed to much of the biodiversity and ecological losses that Ireland now faces, made evident within the last National Parks & Wildlife Service (NPWS) report to the EU Commission - "The Status of EU Protected Habitats and Species in Ireland 2019"[1]. Raised Bog (active) and Degraded Raised Bog, which are already rare and specialised habitats within Europe, have an overall status of "Bad" and "Deteriorating" with "Unfavourable" prospects in Ireland. It is of utmost concern that the raised bog within the Lullymore Bog Complex, now that it is out of production, be fully restored and special attention given to help the return of displaced and lost species. It is in this regard that IPCC are making comments on the proposed windfarm, with the aim of protecting important areas and improving the ecological integrity of peatland in Counties Kildare and Offaly.

Concerns
IPCC's chief concern lies with the protection of the numerous raised bog remnants and local biodiversity hotspots of the greater Lullymore Bog and surrounding area. Following is an inventory of sites which deserve rigorous protection from the construction and operation of a windfarm.

Lodge Bog Nature Reserve - Co. Kildare (see Map 1)
This is a raised bog nature reserve and is one of the very few last near intact examples of raised bog remnants within the entire Ballydermot Works Complex. It covers an area of 35ha and while it was drained, it was never brought in to production. IPCC manage this site with the financial and manual support of our members and volunteers, who IPCC represent. 200 dams have been built across the 5km of drains and the water levels are manually monitored year round using the 118 piezometers installed along transects. The aim is to reverse the effects of drainage and the impact of industrial peat extraction on the bog margins.

Lodge Bog provides refuge to 3 Curlew (*Numenius arquata),* consisting of a native breeding pair and a single individual. Curlew are monogamous and show high site fidelity and preference, always returning to their home breeding ground. Curlew are long term residents of Lodge Bog, first officially identified in a baseline faunal survey carried out in 2005 by Michael O'Meara (Hurley, 2005)[2]. A study in 2012 sponsored by Kildare County Council found evidence of breeding and that the 3 Adults have a high preference for Lodge Bog North (Ó Corcora, 2012)[3]. Since 2015 IPCC have formally monitored the arrival and behaviour of the Curlew when they return to Lodge Bog in March and stay until July.

The indigenous Curlew population of Ireland has reduced in number by 96% (Lewis et al, 2019)[4] and as such are listed "Red" within Birds of Conservation Concern in Ireland (NPWS, 2019)[5]. There is currently a national effort to bring this species back from the verge of extinction and BirdWatch Ireland Kildare, NPWS and IPCC have been working together to increase measures on Lodge Bog to improve nesting success. There is indication

Charity No/*Uimhir Carthanacht*: CHY6829 Registered in Ireland No/*Uimhir Cláraithe in Éirinn*: 116156 Registered Office/*Oifig Cláraithe*: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland
Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/*Rúnaí Comhlacht*: Rachel Kavanagh
Directors/*Stiúrthóirí*: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail,

Patrons/*Pátrúnaí*: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,
Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

that the birds are utilising a number of sites in the area with separate confirmed sightings by the Co. Kildare Curlew Conservation Liaison Officer.
A boardwalk at the most northern edge of Lodge Bog allows for schools and tourists to enjoy the vistas of lodge bog while learning about peatland habitats and their importance to future generations. Tourists arrive daily during the summer season and The IPCC facilitates the school visits. The presence of turbines would be another threat to the views in conjunction with dust and blasting from the Hill of Allen quarry and mechanical domestic peat harvesting in the surrounding cutovers.
As breeding Curlew are extremely rare in Ireland and are at risk of extinction, IPCC could not support the construction of a windfarm which may upset migratory routes or supporting habitat for these birds. The installation of large turbines may have unknown consequences on their behaviour and breeding success.
Other species of note on Lodge Bog is the Large Heath Butterfly, actively monitored by IPCC with the National Biodiversity Centre. This species is described as *Vulnerable* within the Irish Red Data List[5], attributed to the fact that the Large Heath is a peat-land specialist and its range has become severely limited and fragmented.
Lodge Bog has to be excluded from the proposed study area and stringent set back distances provided.

Lullymore West Nature Reserve - Co. Kildare (see Map 1)
Lullymore West (4.5ha) is a species rich nature reserve consisting of calcareous and acid grassland, deciduous woodland and cutaway raised bog. The IPCC have owned and managed the site since 2005. The diversity of habitats within the small area adds to the importance of the site as well as the established population of Annex II Priority Species Marsh Fritillary Butterfly, which are monitored throughout the year. The site is actively managed with ongoing scrub removal, grazing trials, a weekly butterfly survey(24 species recorded). Freshwater invertebrate monitoring is also ongoing. Previous works have included drain blocking and tree removal. Volunteers are an important part of IPCC's site management work and Lullymore West provides a backdrop for community engagement. This nature reserve is open to the public and visited daily by locals and tourists (national and international) as a natural amenity. The specialised grassland habitats display rare orchids and the wetland refugia provides for many species of dragonfly and other invertebrates.
The presence of the Annex I Marsh Fritillary highlights the importance of this site - for monitoring and research, community engagement, biodiversity protection and international tourism. IPCC could not support the development of a windfarm which may affect the ecological integrity and future potential of Lullymore West. This site needs to be excluded and provided adequate setback distances from any proposed turbines.

Lullybeg Nature Reserve - Co Kildare (see Map 1)
Lullybeg is a 10ha Bord na Móna rehabilitated cutaway, managed since 2010 by Butterfly Conservation Ireland. It is listed in the Bord na Móna Biodiversity Action Plan 2016-2021. This is an important conservation location as it is home to a population of Marsh Fritillary, the only protected species of butterfly in Ireland. The rewards of the conservation management and scrub removal are evident as the already impressive list of flora and flora recorded on site are ever increasing.
Close by to Lullybeg there is a raised bog remnant which needs to be included in the restoration works (N662022586). This could be supported by the species rich developing flooded cutaway (N6893825389) and calcareous grassland habitats (N6795523611), which, with ecological management and maintenance of access routes linking the areas would add to the diversity of the site.
Lullybeg is another important site within a network of nature reserves regarding the proposed study area that may suffer ecologically with the development and construction of a windfarm. This site needs to be excluded with satisfactory setback distances from any proposed turbines.

Lodge Bog Wetlands - Co. Kildare (see Map 1)
This is a Bord na Móna (~35ha) site that has come out of production. Rehabilitation has been underway since 2014/15. The site has been allowed to re-wet and has since become supporting habitat for Curlew and a nesting ground for Lapwing (Red Listed - The Birds of Conservation Concern in Ireland)[5]. IPCC annually visit this site with the Bord na Móna ecologists as the IPCC Lodge Bog nature reserve is adjacent and this gives an open communication platform for the management of the two sites and to discuss rehabilitation progress. The rehabilitating cutaway is developing as an important biodiversity hotspot with many wetland bird species returning to use the site and Bord na Móna have also conducted *Sphagnum* restoration trials for the potential use across other sites.
Lodge Bog Wetlands, since coming out of production is now supporting a population of breeding Lapwing and is showing promising returns of wintering wildfowl. The construction and presence of turbines may upset the future potential for biodiversity for this site and would also affect Lodge Bog (IPCC). This site should be excluded from the proposed study area and adequate setback distance provided.

Lullymore Wetlands - Co. Kildare (see Map 1)
This is a 100ha rehabilitated area in Bord na Móna ownership developing into fen habitat. A portion of the site is leased by the Lullymore Heritage & Discovery Park and has been developed as a wetland walk which supports a large amount of annual national and international tourists. There is a population of "Red" listed Lapwing using the area and Bord na Móna have liaised with BirdWatch Ireland Kildare in regards to the protection and management of the birds. In 2016 - in conjuction with UCD, a green-house gas monitoring station was installed to research the emissions from cutaway habitats near birch woodland. This site needs to be excluded from the proposed study area and satisfactory setback distances from any proposed turbines are required.

Ballysooghan North - Co. Kildare (see Map 1)
This raised bog is listed in The Bog of Allen Heritage Survey 2005 (Hurley, C. 2005)[6] which described it as actively forming peat with 75% *Sphagnum* cover. IPCC were due to put this site forward to the NPWS for inclusion within the Natural Heritage Area

Raised Bog Network Review as it had conservation value and deserved designation. The IPCC Sites Database records this site as once being the only site within Co. Kildare with *Sphagnum Pulchrum* present. Bord na Móna had also ear-marked this site for biodiversity - yet in 2014 it was discovered that the site had been ditched with drains 9m apart which striated the full length of the remnant. A complaint was made to the Local Authority, NPWS and the Environmental Protection Agency. Bord na Móna apologised for the mistake and accelerated rehabilitation by blocking the drains and bringing the site formally within the Biodiversity Action Plan 2016-2021.
The potential for this damaged but regenerating raised bog is high in regards to protecting the remaining remnants of the greater Lullymore Bog Complex. This site should be excluded from the proposed study area and satisfactory setback distances are necessary.

Aghameelick - Co. Offaly (see Map 1)
This is an eastern raised bog remnant of Clonsast Bog (which is now mostly industrial cutaway) which was described within the Bog of Allen Heritage Survey 2005 as having up to 95% *Sphagnum* cover and a good hummock - hollow topography. The 90ha site is of regional importance due to the rarity of raised bog in Leinster. The IPCC Sites Database lists the Irish Hare (Annex V E.U. Habitats and Species Directive) as utilising this site. This site may be affected by turbines installed within the proposed study area and needs to be screened hydrologically and ecologically. The species present within the proposed study area or Aghameelick Bog may use migratory routes between them and the presence or construction of turbines could disturb them.

The Long Derries SAC (Sitecode:000925) - Co. Offaly (see Map 1)
This 30.37ha stretch of low esker ridge mixed with loam and peat soils is designated under the E.U. Habitats Directive as it contains Orchid-rich Calcareous Grassland as a qualifying interest. Within the NPWS Site Synopsis the Nightjar (Annex I of the E.U. Birds Directive) is listed as breeding on site and the Partridge, a Red-Listed bird in Ireland, is also present contributing to the high conservation importance of The Long Derries SAC. Satisfactory setback distance from any proposed turbine must be provided.

Mouds Bog SAC (Sitecode:002331) - Co. Kildare (see Map 1)
This raised bog Special Area of Conservation has been described by the NPWS as of regional and national importance due to the low amount of raised bog in Co. Kildare. There is an assemblage of flora that is indicative of raised bog habitat such as *Sphagnum spp.,* Heather, Bog Rosemary and Bog Asphodel. The bird wildlife increases the conservation value with Kestrel, Skylark, Meadow Pipit and Red Grouse being present, the latter two being "Red" listed on the Birds of Conservation in Concern in Ireland. This site is to avail of restoration measures in 2022, funded by the €5m announced for peatland restoration on non-Bord na Móna lands. Bord na Móna is to carry out the restoration works. This site needs satisfactory setback distances from any proposed turbine.

Pollardstown Fen SAC (Sitecode: 396) - Co. Kildare (see Map 1)
This is the largest spring-fed fen in Ireland and is internationally important due to the rare species present which depend on the unique habitat. Three Annex I Priority Habitats are listed for Pollardstown Fen - Alkaline Fen, Calcareous Fen with *Cladium mariscus* and Petrifying Springs with tufa formation. The fen is hydrologically dependent on the calcium rich waters rising primarily at the margins. There are a number of rare and protected species described in the IPCC Sites Database such as 3 species of Whorl Snail (the only site in Europe to support all three), Marsh Fritillary, Otter, Golden Plover, Marsh Harrier and Greenland White-Fronted Geese. Pollardstown Fen was also included in the "Dragonfly Ireland Project" and 12 species of Dragonflies were recorded. It was also discovered than this fen is the only known site within Co. Kildare to support the Blue-Tip dragonfly. The established boardwalk and walking route around the fen allows the local community and visitors to enjoy the specialised range of flora and fauna. This site needs adequate setback distances and the potential for detrimental hydrological effects from construction of any turbines within a sensible range needs to be examined closely.

Wetland Surveys Ireland - (See Map 2)
Wetland Surveys Ireland, on behalf of Offaly and Kildare County Councils, have earmarked a number of wetland sites for an ecological survey:- Rathvilla Ponds (WMI_OF213, raised bog, cutover bog, fen), Ballykillen Cutover (WMI_OF208, cutover bog, bog woodland), Cloncert Kilcumber (WMI_OF212, cutover bog, fen), Ballydermot-Clonbrown (WMI_OF215, raised bog, cutover bog, fen), Cushaling South East Bog (WMI_OF74). These sites need to be ecologically surveyed the data recorded included within the respective County Wetland Survey. It is not possible to ascertain the possible detrimental affect that a wind energy development may have if a sites ecological importance has not been described.

Cushaling East Wet Heath (WMI_KE106, wet heath, cutover bog), Cushaling River Valley (WMI_KE217), Ballysooghan (WMI_OF48), Ballydermot (WMI_OF215), Rathmore Bog (WMI_KE51, raised bog, cutover bog), Ballyteige South Bog (WMI_KE102), Allenwood South Bog (WMI_KE100, raised bog), Clonavoe Bog (WMI_OF85, raised bog, cutover bog) and Cloncreen Ballrath Cutover Complex (WMI_OF214) have been described as having moderate/high local conservation value or are nationally important. These sites need adequate setback distances so as not to disturb the ecological integrity of the habitats present.

R414
IPCC operates from the Bog of Allen Nature Centre where we educate schools groups and members of the public in peatland ecology and the importance of a natural environment. At the centre we use the wildlife gardens and peatland museum as educational tools. The only route for coaches and visitors to arrive at the nature centre or the local nature reserves (Lodge Bog & Lullymore West) is along the R414, which is a small narrow road with peatland on both sides. Large vehicles have difficulty traversing the route and any large construction operation (transport of materials/cable laying) will cause problems. If this road is to be closed for any amount of time The Bog of Allen Nature Centre will not be able to operate and lose the main source of operational finance.

Construction sites may also be an issue for IPCC if when we bring schools to the nature reserves we have to bring them through a building site. In previous windfarm applications this was highlighted by IPCC but never addressed.

Conclusion

The IPCC are not intrinsically against windfarms. We understand the environmental benefits of halting the use of fossil fuel and being sustainably self-sufficient in regards to power generation - which must meet the required needs of a modern electrical society. IPCC have campaigned for the end of fossil fuel for the reason that the practice has destroyed and fragmented large amounts of unique habitat, straining wildlife populations and bringing them to the brink of extinction. The vast expansive Bog of Allen has been irreversibly affected and it is only remnants of which communities can hold on to. The presence of a wind farm straddling the small conservation areas will fragment their effectiveness - yet there is an opportunity to take advantage of an economy of scale which the smaller conservation efforts can only aspire to. With the rehabilitation of the areas now out of production on the horizon, conservation can happen on a larger footprint. There is now the potential for the different biodiversity areas , which are actively managed and monitored by individual groups[7] - to be linked up via amenity and walking routes. IPCC would welcome proposals in this regard. There has been windfarm planning proposals for this area before (Maighne) which proposed no real plan and benefit for the community, infact they showed complete disregard for the locations of the nature reserves and only cared for the project itself. In the past there has been a strong oppostition to windfarm developments in the area. Without proper regards to community input, discussion, real conservation dividends and amenity development the proposed project may also suffer negative reactions. IPCC are not planning to object to a sustainable energy development, but size, number of turbines, locations, construction issues and sensitivities to the environment must be taken into account.

The Lullymore Bog Complex has the international advantage of consisting of a mineral island surrounded by a unique mosaic of peatland habitats. A perfect backdrop to eco-tourism and biodiversity protection. These may not be compatible with the installation of a windfarm across the restorable habitats and the potential to use the area in future for focussed wildlife conservation. The areas and conservation efforts listed above deserve not to also face more anthropogenic pressures on the flora and fauna of interest.

Your Sincerely,



Tristram Whyte - Freshwater Biology B.Sc(hons) - IPCC - Conservation Policy & Fundraising Officer

References:-

[1] The Status of EU Protected Habitats and Species in Ireland 2019, National Parks & Wildlife Service, 2019.

[2] Lodge Bog Management Plan 2005-2010, Irish Peatland Conservation Council, Caroline Hurley, 2005.

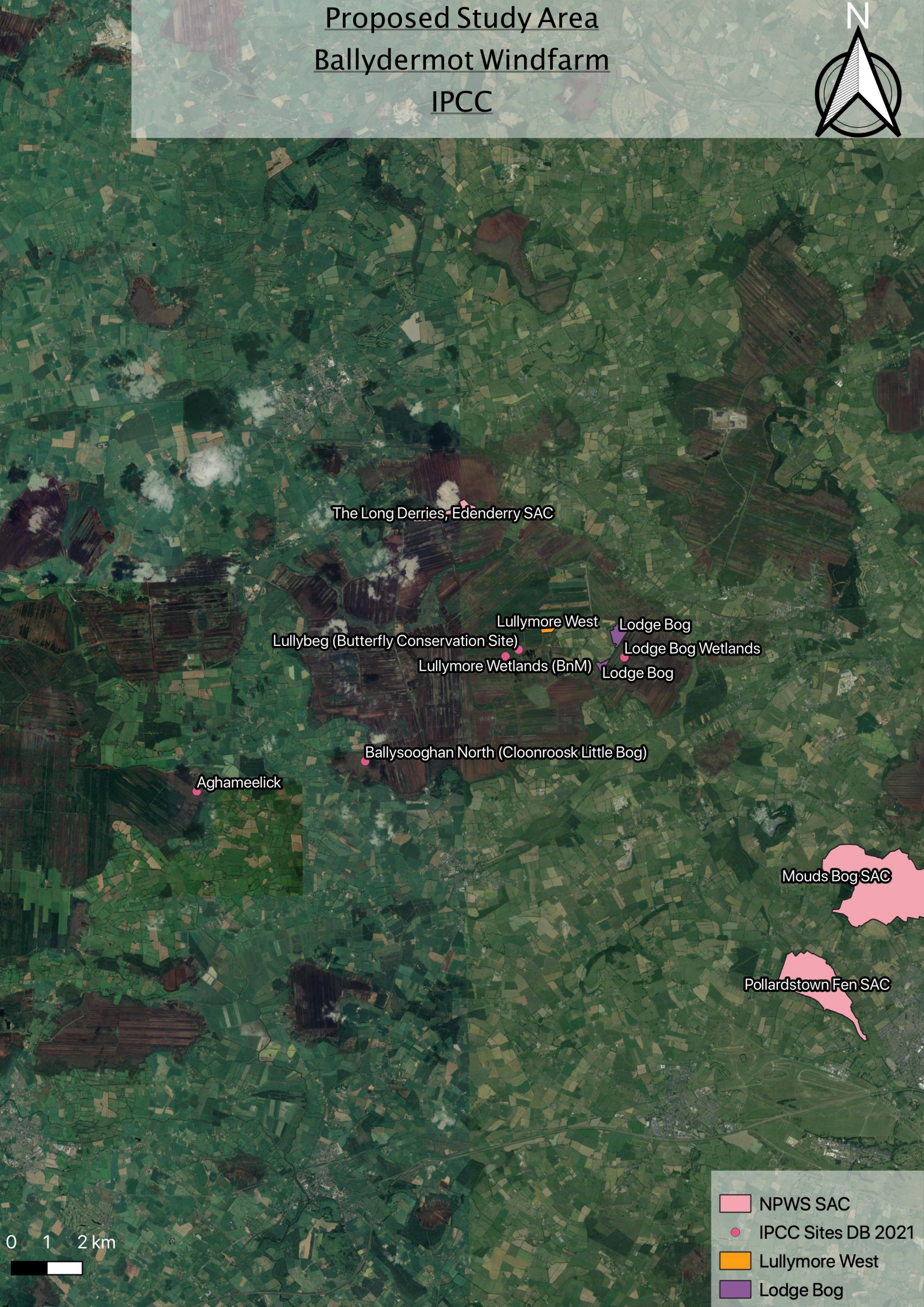
[3] Distribution and Breeding Success of Curlew on Lodge Bog, Co. Kildare, Irish Peatland Conservation Council ,Tadhg Ó Corcora MSc, 2016.

[4] Irish Wetland Bird Survey: Waterbird Status and Distribution 2009/10-2015/16, National Parks & Wildlife Service, 2019

[5] Checklist of Protected and Threatened Species in Ireland, National Parks & Wildlife Service, 2019.

[6] The Bog of Allen Heritage Survey 2005, Irish Peatland Conservation Council, Caroline Hurley, 2005.

[7] Irish Peatland Conservation Council, Lullymore Discovery & Heritage Park, Butterfly Conservation Ireland, BirdWatch Ireland Kildare, Kildare Bat Group.


Proposed Study Area
Ballydermot Windfarm
IPCC
N
The Long Derries, Edenderry SAC
Lullymore West
Lodge Bog
Lullybeg (Butterfly Conservation Site)
Lodge Bog Wetlands
Lullymore Wetlands (BnM)
Lodge Bog
Ballysooghan North (Cloonroosk Little Bog)
Aghameelick
Mouds Bog SAC
Pollardstown Fen SAC
0 1 2 km
NPWS SAC
IPCC Sites DB 2021
Lullymore West
Lodge Bog

Wetland Surveys Ireland



January 14, 2021

1:144,448

0 0.75 1.5 3 mi

0 1 2 4 km

Earthstar Geographics, OS, Esri, HERE, Garmin

Lakshmi Priya

From: INFO <Information@tii.ie>
Sent: Wednesday 17 February 2021 10:10
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Ms. Mulryan,
I refer to your email of 2 February 2021 regarding the above.
Transport Infrastructure Ireland (TII) wishes to advise that it is not in a position to engage directly with planning applicants with respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.
The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.
With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the national road network. The developer should have regard, inter alia, to the following;

1. As set down in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
3. In relation to cabling and potential connection routing, the scheme promoter should note locations of existing national roads and future national road schemes and develop proposals to safeguard national roads and proposed road schemes. As outlined above, consult with the Local Authority/National Roads Design Office in relation to any schemes in planning in the area, especially on the N22.
   Proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.
   In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. The cable routing should avoid all impacts to existing TII infrastructure, such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
4. Clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.
5. Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the

national road network and junctions of lower category roads with national roads. TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.

6. TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
7. Assessments and design and construction and maintenance standards and guidance are available at TII Publications that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
8. The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular;
    a) TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
    b) The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)).

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.
I trust that the above comments are of use in your EIAR preparation.

Yours sincerely,
Alban Mills
Senior Regulatory and Administration Executive

Bonneagar Iompair Éireann
Transport Infrastructure Ireland

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 2 February 2021 12:29
To: INFO <Information@tii.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good afternoon,
MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.
The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.
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.
Kind regards,
Karen.

Karen Mulryan
Environmental Scientist
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Lakshmi Priya

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Sent: Tuesday 23 February 2021 15:12
To: Planning External
Cc: CorporateSupport.Unit
Subject: Reply from DECC re EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballyfermot Co. Offaly/Kildare
Attachments: 21_48 EIA Scoping Wind Farm Development at Ballyfermot Co. Offaly-Kildare.pdf; 21_33 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot Co. Offaly & Co. Kildare.pdf

Good afternoon Olivia,

Please see attached and below a reply from Ms. Trish Smullen, on behalf of Geological Survey Ireland, (a division of the Department of Environment, Climate and Communications) for the subject below. Please forward an acknowledgement of receipt to CorporateSupport.Unit@decc.gov.ie at your earliest convenience.

Yours sincerely,
Enda Brady,
Corporate Support Unit,
Department of Environment, Climate and Communications.
087 623 7714

From: Trish Smullen
Sent: 23 February 2021 08:26
To: CorporateSupport.Unit
Cc: Clare Glanville; John Butler
Subject: Re: EIS 21/48 - EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballyfermot Co. Offaly/Kildare

Hi Enda,
Please see attached documents for return to Offaly County Council.
Thanks and regards,
Trish

From: John Butler
Sent: 16 February 2021 17:28
Subject: EIS 21/48 - EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballyfermot Co. Offaly/Kildare

EIS 21/48

EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballyfermot Co. Offaly/Kildare. Request for observations by Offaly Co Council to be forwarded via the CSU mailbox before 8 March, 2021. Document is enclosed.

Regards,

John

From: Olivia Hughes [mailto:OHughes@offalycoco.ie]
Sent: 16 February 2021 11:14

To: planning@water.ie; landuseplanning@tii.ie; bord@pleanala.ie; EIAPlanning@epa.ie; CorporateSupport.Unit; referrals@chg.gov.ie; Phoebe Duvall; planning@artscouncil.ie; Mark Mahon; Hugh McConnell; Env WS Planning Referrals; Deirdre McGrath
Cc: Jean Ryan; Michael Duffy; Carroll Melia; Gabriel Conlon; Andrew Murray
Subject: SC/ED/21 02 EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballyfermot Co. Offaly/Kildare
Importance: High

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Hi Folks

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord Na Mona Powergen Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly/ Kildare border. Please find attached scoping report issued to you as part of the consultation process. We would be interested in receiving any comments or observations you may have on the proposed development relevant to your area of expertise.

Comments can be submitted by the **9th March 2021** by email to planning@offalycoco.ie or by post to Planning Department, Offaly County Council, Aras an Chontae, Charleville Road, Tullamore, Co. Offaly.

If you have no comments to make I would be grateful if you would please acknowledge receipt of this email.

Regards

Olivia Hughes
Planning Section | Offaly County Council
Phone Planning: +353 57 9357434| Phone Switch: +353 57 9346 800
Email: ohughes@offalycoco.ie| Web: www.offaly.ie
Áras an Chontae, Charleville Road, Tullamore, Co. Offaly | R35 F893 | Ireland

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Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach. Deimhnítear leis seo freisin nár aims odh víreas sa phost seo tar éis a scanadh.

Lakshmi Priya

From: EIAPlanning <eiaplanning@epa.ie>
Sent: Tuesday 9 March 2021 16:40
To: Olivia Hughes
Subject: RE: SC/ED/21 02 EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballydermot Co. Offaly/Kildare
Attachments: EIA Scoping Document Bord na Mona Powergen Ltd - Ballydermot Windfarm.pdf

Re: Request for comments or observations from the Agency in relation to EIA Scoping Document

Dear Ms Hughes,
I refer to your correspondence received by the Agency on 16 February 2021 requesting comments in relation to the EIA Scoping Document for a proposed Bord Na Mona Powergen Ltd wind energy development at Ballydermot Co. Offaly/Kildare.

On 04 February 2021 the Agency received an EIAR Scoping Document from MKO Consultants in respect of the above Bord na Mona Powergen Ltd wind energy development.

The Scoping Document refers to land-use/activities within the proposed site comprising a mix of areas not long out of commercial production (undertaken under IPC Licence No. P0503). It should be noted that Bord na Móna Allen Peat Limited, Allen Group, c/o Derrygreenagh Works, Rochfordbridge, Westmeath was issued an IPC Licence (Register No. P0503) on 28th April 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 '*the extraction of peat in the course of business which involves an area exceeding 50 hectares*'. The IPC licence may need to be reviewed or amended to accommodate the proposed development.

The EPA carried out consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive), with the Planning Authorities and relevant prescribed bodies under Section 89 of the EPA Act seeking comments on the scope and level of detail of the information to be included in the EIAR.
The Agency will respond to MKO with a Scoping opinion on the scope and level of detail of the information to be included in the EIAR.

For all further queries and correspondence relating to planning matters please contact eiaplanning@epa.ie.

Regards,

EIA Planning
Environmental Licensing Programme
Office of Environmental Sustainability
Environmental Protection Agency
Tel: 053-9160600

From: Olivia Hughes <OHughes@offalycoco.ie>
Sent: 16 February 2021 11:14
To: planning@water.ie; landuseplanning@tii.ie; An Bord Pleanala <bord@pleanala.ie>; EIAPlanning <eiaplanning@epa.ie>; CorporateSupport.Unit@DCCAE.gov.ie; referrals@chg.gov.ie; An Taisce <planning@antaisce.org>; planning@artscouncil.ie; Mark Mahon <mmahon@offalycoco.ie>; Hugh McConnell <hmcconnell@offalycoco.ie>; Env WS Planning Referrals <envwsplanningreferrals@offalycoco.ie>; Deirdre McGrath <Dmcgrath@offalycoco.ie>
Cc: Jean Ryan <jryan@offalycoco.ie>; Michael Duffy <MDuffy@offalycoco.ie>; Carroll Melia <cmelia@offalycoco.ie>; Gabriel Conlon <gconlon@offalycoco.ie>; Andrew Murray <AMurray@offalycoco.ie>
Subject: SC/ED/21 02 EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at

Ballyfermot Co. Offaly/Kildare
Importance: High

Hi Folks

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord Na Mona Powergen Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly/ Kildare border. Please find attached scoping report issued to you as part of the consultation process. We would be interested in receiving any comments or observations you may have on the proposed development relevant to your area of expertise.

Comments can be submitted by the **9th March 2021** by email to planning@offalycoco.ie or by post to Planning Department, Offaly County Council, Aras an Chontae, Charleville Road, Tullamore, Co. Offaly.

If you have no comments to make I would be grateful if you would please acknowledge receipt of this email.

Regards

Olivia Hughes
Planning Section | **Offaly County Council**
Phone Planning: +353 57 9357434| Phone Switch: +353 57 9346 800
Email: ohughes@offalycoco.ie| Web: www.offaly.ie
Áras an Chontae, Charleville Road, Tullamore, Co. Offaly | R35 F893 | Ireland

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Lakshmi Priya

From: Olivia Hughes <OHughes@offalycoco.ie>
Sent: Wednesday 14 April 2021 13:11
To: Karen Mulryan
Cc: Michael Duffy; Carroll Melia; Andrew Murray
Subject: EIA Scoping Document for proposed Bord Na Mona Powergen Ltd wind farm development at Ballydermot, Co. Offaly.
Attachments: Reply from DECC re EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballyfermot Co. Offaly/Kildare; RE: SC/ED/21 02 EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd Wind Farm Development at Ballydermot Co. Offaly/Kildare; RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare; Appendix D IFI RESPONSE.pdf; Response to Consultant.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen

I refer to our recent telephone conversation and I now attach herewith Offaly County Council's response in relation to the above scoping request.
Please acknowledge receipt.

Regards

Olivia Hughes
Planning Section | Offaly County Council
Phone Planning: +353 57 9357434| Phone Switch: +353 57 9346 800
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Offaly County Council
Áras an Chontae, Charleville Road,
Tullamore, Co. Offaly, R35 F893.

Comhairle Chontae Uíbh Fhailí
Áras an Chontae, Bóthar Charleville,
An Tulach Mhór, Contae Uíbh Fhailí, R35 F893.

T: 057 9346800 F: 057 9346868 / www.offaly.ie / customerservices@offalycoco.ie

Your Ref: 191136

MKO,
Tuam Road,
Galway
H91 VW84

14th April 2021

Re: EIA Scoping Document for Proposed Bord Na Mona Powergen Ltd. Wind Farm Development at Ballydermot, Co. Offaly.

Dear Sirs,

I refer to your correspondence dated 28/01/2021 in connection with the above.

The Planning and Development Regulations 2001, as amended, require the following is submitted with a EIAR Scoping Request (art. 95 1(c) and (d) refers):
a description of— (i) the nature of the proposed development, (ii) the development's specific characteristics, including its location and technical capacity, and (iii)the development's likely impact on the environment, (d) if the proposed development comprises or is for the purposes of an activity requiring an integrated pollution control licence or a waste licence, an indication of that fact.

The following information should be contained, in sufficient detail, in the EIAR:
The information specified in para 1, Schedule 6 of the Planning and Development Regulations, 2001, as amended;

The information specified in para 2, Schedule 6 of the Planning and Development Regulations, 2001, as amended.

The content of the EIAR should have regard to the following:

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, August 2018.
- The EPA Guidelines on the Information to be contained in Environmental Impact Assessment Reports Draft August 2017;
- EPA advise notes on current practice in the preparation of environmental impact statements for planning authorities September 2002,
- The Draft Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR),
- Wind Energy Development Guidelines, Guidelines for Planning Authorities" by the DoEHLG in June 2006.
- Draft Revised Wind Energy Development Guidelines by the DoHPLG in December 2019.

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- Relevant provisions of the Offaly County Development Plan 2014-2020 or Offaly County Development Plan 2021-2027, as applicable at time of lodgement of planning application, and any variations of same.
- An assessment of the cumulative impact of the proposal in light of the existing/permitted projects in the area. This asssessment needs to be robust and comprehensive. This shall include but not be limited; a robust visual impact assessment, comprehensive noise assessment, all relevant traffic assessments and detailed bird and biodiversity surveys in line with National and European guidance/requirements.
- Comprehensive grid connection and associated cabling/works to be included in the EIAR which outlines the options considered as part of the proposal.
- Applicant should use utilise exactly the same (key) photomontage points as would have been used in Mt. Lucas and Cloncreen.
- Have regard to Midlands Cycling Destination (Offaly) Feasibility Study, 2016 in conjunction with Bord na Mona
- The amenity / access plan should be very comprehensive given this will be one of the largest windfarms in the country and covers c. 6,500 ha. It should also look at the possibility of a walking / cycle link from the Grand Canal Greenway (mainline) near Edenderry to the Grand Canal branch line near Rathangan (Barrow Blueway).

Opinion Summary of responses/comments received from Prescribed Bodies by Offaly County Council as part of the scoping request.

Geological Survey Ireland in its response have included comments under the following headings/notes the following;

- Geoheritage
- Groundwater
- Geological Mapping
- Geohazards
- Natural Resources
-

General scoping response from Geological Survey is included in this response.

Inland Fisheries Ireland (IFI) in its response notes the following;

- Concerns relating to water quality and habitat/hydro-morphological issues that persist throughout the Figle and Slate River Systems linked to peat extraction and the potential that this proposed development may consolidate issues.

General scoping response from Inland Fisheries Ireland is included in this response

The Environmental Protection Agency (EPA) in its response notes that on the *"04 February 2021 the Agency received an EIAR Scoping Document from MKO Consultants in respect of the above Bord na Mona Powergen Ltd wind energy development. The Scoping Document refers to land-use/activities within the proposed site comprising a mix of areas not long out of commercial production (undertaken under IPC Licence No. P0503). It should be noted that Bord na Móna Allen Peat Limited, Allen Group,*

Contd/…

c/o Derrygreenagh Works, Rochfordbridge, Westmeath was issued an IPC Licence (Register No. P0503) on 28th April 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 'the extraction of peat in the course of business which involves an area exceeding 50 hectares'. The IPC licence may need to be reviewed or amended to accommodate the proposed development.
The EPA carried out consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive), with the Planning Authorities and relevant prescribed bodies under Section 89 of the EPA Act seeking comments on the scope and level of detail of the information to be included in the EIAR.
The Agency will respond to MKO with a Scoping opinion on the scope and level of detail of the information to be included in the EIAR"
General scoping response from Environmental Protection Agency is included in this response.

Transport Infrastructure Ireland in its response have included comments

- As set down in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
- In relation to cabling and potential connection routing, the scheme promoter should note locations of existing national roads and future national road schemes and develop proposals to safeguard national roads and proposed road schemes. As outlined above, consult with the Local Authority/National Roads Design Office in relation to any schemes in planning in the area, especially on the N22.
    - Proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.
    - In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. The cable routing should avoid all impacts to existing TII infrastructure, such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
- Clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.

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- Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
- TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
- Assessments and design and construction and maintenance standards and guidance are available at TII Publications that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
- The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular;
- TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
- The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)).

General scoping response from Transport Infrastructure Ireland is included in this response

Summary of responses/comments received from the internal departments of Offaly County Council as part of the scoping request.

Comments from the Road Design section, Offaly County Council, as follows:

General Requirements

- A Construction Management Plan shall be submitted to OCC. Contents to include implementation of planning conditions and EIS requirements.
- OCC to be advised of details of PSDP, PSCS and contractors.
- A road opening licence will be required from OCC
- Insurances
- Performance bond
- A dedicated liaison engineer to be appointed by OCC and all associated costs covered by the Developer.
- Long term damage fee or works in lieu.
- Developer to consult with An Garda Siochana, emergency services and bus operators in relation to each stage of the works.

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- Developer to liaise with planning authority in Kildare County Council and Offaly County Council.
- Liaison with the public, residents, businesses and schools.
- Allow for briefing of Elected Members in affected Municipal Districts

Turbine Delivery Routes

- Developer to liaise with TII, Tullamore Area Office, Edenderry Area Office and Kildare County Council in relation to deliveries.
- Detailed programme of deliveries to be submitted to OCC in advance of commencement of deliveries. Details to include dates and times, number of loads, weights, road closure and diversion routes, support vehicles, etc.
- Identification of landowners at all nodes and entry/exit points requiring temporary or permanent works. If OCC consider that the land used for any temporary or permanent works would be beneficial for the improvement of the existing road, then the developer shall carry out a design for the improvement and implement same.
- Pre-condition survey of delivery routes, consisting of a video survey and photographs, and a detailed survey of all node locations to be carried out and a copy submitted to OCC. Survey at nodes to include drainage, landscaping, surfacing, boundary fences/hedges/gates, signage.
- Where OCC consider a proposed delivery route is not in a suitable condition, the developer shall upgrade the road or junction in advance of delivery operations.
- Any damage caused to the road shall be repaired to its previous condition, to the satisfaction of OCC.
- Developer to consult with all service providers (including Irish Water) in relation to turbine delivery routes. OCC to be advised of any alterations required.
- Developer to consult with An Garda Siochana and emergency services in relation to the turbine deliveries.
- Design and construction details for temporary modifications at node points to be submitted, for approval by OCC. Details to include arrangements for both delivery phases and road open phases. Road safety audits in accordance with DMRB HD 19/12 to be carried out, if appropriate. OCC may request All EIS requirements to be achieved.
- Abnormal load permits will be required.
- Any alterations affecting the width of the existing road shall be reinstated to the original width, unless otherwise agreed with OCC. Where roads are widened, the specification shall be that of the existing road at a minimum.
- An emergency plan shall be submitted.
- Liaison with local groups such as Tidy Towns, etc.
- Liaison with the TII for transportation on the motorway.
- All areas affected by the works shall be fully reinstated to their original condition. Where landscaping has been removed, similar plants of similar maturity shall be used for reinstatement. Where it is not possible to replace mature trees, younger trees plus additional landscaping shall be provided in lieu to enhance the area. Where hedging is removed and new hedging planted as reinstatement, suitable fencing shall be provided for the protection of the hedge, and maintenance shall be provided until the hedge is established. Where grass is replaced with new seeding, the grass shall be maintained until it is established. Full reinstatement shall be completed within one month of the final delivery.

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Materials Delivery Routes:

- Developer to liaise with TII, Tullamore Area Office, Edenderry Area Office and Kildare County Council in relation to deliveries.
- Detailed programme of deliveries to be submitted to OCC for prior approval in advance of commencement of deliveries. Details to include number of movements per day, weights.
- Traffic management plan to be submitted for haulage of materials, including at entry/exit points.
- Pre-condition survey of delivery routes, consisting of a video survey and photographs, a Road Condition Survey, and an FWD Survey where required, to be carried out and a copy submitted to OCC.
- Where OCC consider a proposed haul route is not in a suitable condition, the developer shall upgrade the road or junction in advance of haulage operations.
- Any defects that appear during the haulage period shall be rectified by the developer.
- Any damage caused to the road shall be repaired to its previous condition, to the satisfaction of OCC.
- Public roads shall be kept free of mud, dust, spillages and debris. Any necessary measures shall be put in place at site entry/exit points.

Cable Routes (If Applicable):

- Details of cable installation to be submitted to OCC in advance of commencement of works. Details to include works programme, construction details, cross-sections for each road showing location of trench in road and existing road width, existing services.
- Where road closures are required, an application must be submitted to OCC at least 8 weeks in advance.
- Where road works speed limits are required, an application shall be submitted to OCC at least 8 weeks in advance. Signs to be erected by the developer.
- Diversion routes to be maintained whilst the diversion is in place.
- Traffic management plans to be submitted for each stage of the works.
- Pre-condition survey of cable routes, consisting of a video survey of the full route and photographs at every entrance and boundary structure to be carried out and a copy submitted to OCC. Any damage caused to the road or adjacent properties shall be repaired to its previous condition, to the satisfaction of OCC and/or landowner.
- Pre-condition structural surveys on adjacent properties shall be carried out where necessary.
- All works shall be in accordance with the TII Specification for Road Works unless otherwise specified.
- Reinstatement of the trench in local and regional roads shall be in accordance with the latest version of "Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads" (The Purple Book), except where noted otherwise.
- Reinstatement of the trench in national roads shall be in accordance with the latest version of "Specification for the Reinstatement of Openings in National Roads", except where noted otherwise.
- After temporary reinstatement of the trench:
    - A full width overlay shall be provided on all local roads.
    - A half road permanent reinstatement shall be provided on regional roads > 6.0 metres wide.

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- National road – to be agreed with TII and OCC

- All permanent restoration shall be agreed with OCC.
- Ironworks shall be raised & reset as necessary and road markings and road studs reinstated.
- All existing watercourse crossings/bridges shall be identified and detailed designs submitted to indicate how these will be crossed.
- The developer shall allow in his programme for accommodation of local events, such as charity walks and cycles.
- A defects liability period of 2 years shall apply. This shall commence when written notification has been given that the permanent reinstatement/overlay has been completed.

Comments from the Edenderry Area Engineer, as follows:

Section 6.2.3.2.6 Material Assets: Traffic and Transportation:

One of the most significant impacts will likely be construction material supply, being transported on the roads network via HGVs. The impact of significant volumes of HGVs is more acute on roads constructed on peat (also known as rampart roads), a particular issue in this area of Co. Offaly. HGVs cause significantly more damage to roads foundations and structures than other vehicles. HGVs significantly affect road maintenance requirements.

Assessment methodology should include current and relevant guidelines including TII Publication PE-PDV-02045 (Traffic and Transport Assessment Guidelines) inter alia. The assessment should include Regional Roads and local roads (and National where proposed) within County Offaly, not only in the immediate vicinity of the proposed windfarm but extending through the County. The assessment should adequately assess the volume/portion of transport that will uses each route eventually leading to the Windfarm. The routes in close proximity of the site however (e.g. R401) should be given particular consideration where it is likely that a high number of vehicular movements related to the proposed development are anticipated. Assessments should contain sufficient granularity as to what proportion of material is anticipated on which route (from north or south of the site, etc.), and which routes it is proposed to confine construction traffic to.

Where it may be proposed to place cable routes on roads (particularly rampart roads), consideration should be given of the effect on the roads asset, aiming to ensure that the assets are structurally stable and robust post-construction. Serviceability of the proposed cable infrastructure (and related road where relevant) should also be a consideration in the EIAR.

To the extent that it possible, the proposed project should seek to minimise disruption to local residents and users of local transport infrastructure through co-ordination with other similar planned and/or consent renewables/electricity projects in the area.

Sufficient consideration should be taken of roadside drainage and the potential impact of this project on its effectiveness/provision/maintenance.

Environment/Water Services Section, Offaly County Council had no comments to make.

The applicant shall note that the giving of a written opinion shall not prejudice the exercise by the Planning Authority concerned or the Board of its power under the Planning and Development Act, 2000, as amended, or any regulations made thereunder, to require the

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person who made the request to submit further information regarding the application concerned or, as the case may be, any appeal.

Yours faithfully,

Olivia Hughes.

Administrative Officer,
Planning Section.

/td

Contd/…

Karen Mulryan
MKO, Environmental Consultants
Tuam Road
Galway
H91VW84

COMHAIRLE CHONTAE UÍBH FHAILÍ
11 MAR 2021
PLANNING

08 March 2021

Applications by Bord na Mona Powergen Ltd for a windfarm development at Ballydermot, Counties Kildare and Offaly.

Dear Sir,

IFI is charged with the protection, conservation and promotion of fisheries within our functional area. Board policy is aimed at maintaining a sustainable fisheries resource through preserving the productive capacity of fish habitat by avoiding habitat loss, or mitigating harmful alteration to habitat.

The site of this significant proposed development is located primarily within the Figile and Slate River catchments, both of which are tributaries of the Barrow SAC system.

The Barrow River is an important Spring Salmon & trout fishery and supports several species listed in Annex II of the Directive including Salmon, River Lamprey, Brook Lamprey, Sea Lamprey, Freshwater Pearl Mussel and Otter. Much of the main channel of the Barrow River and many tributaries are candidate Special Areas for Conservation (SAC) under the European Habitats Directive.
The Figile and Slate River are two of the four tributaries (Figile, Cushina, Philipstown/Daingean & Slate), draining large peatland areas which combined are known as the Black River system. The Black River is by far the largest tributary of the Barrow system draining, 622km^2 and represents 21% of the entire Barrow catchment.
Salmon spawning/recruitment within the Black River is currently limited to small sections of the Slate and Cushina rivers. Until relatively recently however salmon spawning/recruitment in the Black River occurred over a far wider range, with important salmon spawning in the Esker River (Daingean tributary) and throughout much of the Slate Rivers, while much of the Figile River has excellent salmonid habitat/habitat potential.
IFI believe that the restoration of salmon spawning recruitment throughout the Black River is integral to improving salmon stocks in the Barrow SAC.

The Barrow is one of Ireland's largest salmonid systems and its importance to populations of species and habitat types listed in the European Habitats Directive is recognized by the fact that much of the main channel and many tributaries have been designated as candidate Special Areas for Conservation (SAC) under the European Habitats Directive.
Adult salmon spawn in shallow waters during the Winter months and the adult salmon that spawn in systems such as the Black River will have resided in deeper sections of the Barrow main channel prior to entering the Black River system to spawn. Conversely the progeny of the salmon that spawn in the Black River system as they grow older and larger will travel downstream to the deeper waters of the Barrow main channel, before smoltifying and migrating to sea. IFI would like to stress that the populations of

salmon (and other Habitats Directive species) in the Black River systems are an important/integral component of the salmon populations of the Barrow River SAC even though the Black River is not SAC designated.
To reinforce this point, the most important salmon spawning/nursery tributary on the entire Barrow system is the Greese River which flows through Counties Wicklow and Kildare.
When the decision on which tributaries of the Barrow were to be designated as an SAC was being made, serious water quality issues in the Greese, from a number of point source discharges in the upper reaches meant that salmon production in this system was limited and for that reason the Greese was not SAC designated. Since then however, there have been significant improvements in water quality in the Greese and it is now the most important salmon spawning and nursery tributary of the Barrow system even though it is not SAC designated.

IFI's main concerns relating to this development can be broken down under two different headings.

1. Serious water quality and habitat/hydro-morphological issues that persist throughout the Figile and Slate River system linked to peat extraction operations by Bord na Mona. Of concern is the potential that this proposed development may consolidate these water quality and hydro-morphological issues.
2. Direct impacts upon water quality/quantity related to the construction/operation phase.

IFI concerns relating to water quality and habitat/hydro-morphological issues that persist throughout the Figile and Slate River systems linked to peat extraction and the potential that this proposed development may consolidate these serious issues, include:

- The WFD Ecological Status/Potential for numerous waters draining Bord na Mona peatland areas throughout the Black River system is "Poor", while for many the WFD Risk calculation is that they are "At Risk".
- The WFD Characterization Reports for numerous waters throughout the Black River system draining peatland areas identifies peat extraction as a significant pressure, with organic pollution the main impact associated with peat extraction.
- To facilitate peat harvesting deep drainage channels were constructed throughout peatland sites. Deepening of fisheries water-courses adjacent to and downstream of peatlands was also undertaken to facilitate this peat harvesting. These significant alterations lowered the water table within surrounding peat deposits and result in the associated peat being exposed to air, facilitating the rapid breakdown of this organic matter, releasing nutrients, principally ammonia to waters.
- The drying out of the peats exacerbates the washout of peat solids to surface waters. The potential for peat particles to become windblown is exacerbated by drying out also.
- Silt settlement ponds are used extensively on Bord na Mona properties, but are likely to retain heavier suspended solids only, with limited retention of dissolved nutrients. The ability of a silt settlement pond to retain fine particles depends upon regular maintenance, as it relates to residence time within the pond and as suspended solids settle out in the pond the retention time for water within that cell and the efficiency of the system reduces significantly. The efficiencies of these ponds in relation to their retention time needs to be considered, with a specific focus upon periods of high precipitation.
- Suspended solids pollution of surface waters from worked peatland areas is not limited to carry-over from silt settlement ponds, but occurs as a result of direct run-off from haul roads and

COMHAIRLE CHONTAE UÍBH FHAILÍ
11 MAR 2021
PLANNING

stockpiles of peat. Wind-blown peat is another significant source. The potential for suspended solids generation from excavations in subsoils below peat deposits should also be considered.

- To date the main water protection/mitigation measure employed by Bord na Mona at peatland sites is the use of silt ponds. Silt ponds do not address the threat of ammonia pollution from working/cut-over peatland areas.
- Peat extraction requires the drainage/pumping of waters from relatively shallow peat deposits. Of concern to IFI is the potential that the temperatures of this drainage water may (at certain times of the year) be significantly elevated when compared to typical groundwater recharge and/or the surface waters to which it is being discharged.
- Following on from the above point, this drainage water is likely to flow through a large drainage system which may include multiple, large surface area silt settlement ponds. Given the relatively shallow depth of the silt ponds and potential for full sunlight penetration, IFI have concerns that there is potential for a significant increase in temperatures of this drainage water prior to discharge to surface waters.
- Given the important link between water temperature and biological/biochemical reactions, the temperature of drainage waters being discharged to fisheries streams/rivers is critical in that some key constituents of water, either change their form (ionization of ammonia) or alter their concentration, as with dissolved oxygen. Considering that ammonia losses from drained peatland are the principal water quality issue it is important that this issue be adequately addressed.
- An examination of OSI 6 & 25 inch sheets highlight significant modifications to watercourses flowing through, adjacent to and downstream of the peatland sites in the Black River catchment. The modifications noted (through both desktop checks and on-site visits) included:
    - Realignment/Straightening
    - Deepening
    - Widening
    - Culverting/piping of waters
    - Construction of on-line silt ponds to facilitate commercial peat extraction.
    - Differences in height where waters are lifted to facilitate drainage
- Realignment/straightening of watercourses is problematic for a number of reasons including the fact that it results in a net loss of habitat. Realignment of channels often results in a highly degraded hydro-morphology with the loss of natural sinuosity and natural instream variation characterized by the pool/glide/riffle sequence. Realignment may also negatively impact upon gravel recruitment at the realigned site and in waters downstream.
- The deepening of watercourses in, or adjacent to peatland sites, (in addition to the release of ammonia and suspended solids to surface waters) may result in the removal of all/most gravels from long stretches of fisheries waters where the excavation depth extends down to the subsoils beneath the watercourse. In such cases the potential for natural restoration in waters flowing through peatland areas is limited, given the relatively low gradient and other hydro-morphological issues referred to in the above point. **Significant human intervention is likely to be necessary to facilitate recovery of the fisheries habitat on long stretches of watercourses draining peatland areas in the Black River catchment.**
- The widening of watercourses, (regularly associated with realignment and deepening) often results in a highly degraded hydro-morphology with the loss of natural sinuosity and natural instream variation characterized by the pool/glide/riffle sequence. In shallow waters a braided channel with limited depth for fish to reside is often the result, while in deeper waters an over-abundance of aquatic plants clogging the channel is regularly encountered.



- Culverting is potentially damaging to fisheries waters as it may (1) block/impede the free passage of fish, (2) result in a loss of fisheries habitat and (3) hinder the detection of pollution. Our experience is that many of the culverts on Bord na Mona peatlands to facilitate the industrial light rail system are very long. The depth at which such culverts were installed also acts as a control re drying out of peats, as all peats upstream of the culvert at a higher elevation will be subject to drying out.
- Construction of on-line silt ponds results in a loss/degradation of fisheries habitat. The efficacy of any silt pond relates to residence time in the pond and as peat settles out in the pond the ability for the pond to retain peat is reduced. Because of this, these ponds are subject to regular maintenance whereby accumulated peat deposits are removed.
- IFI have noted significant gradient differences on watercourses on peatland sites within these catchments where water is lifted from one to the other using archimidean screw technology. Such practices also represent a barrier to the free passage of fish.
- The water quality and habitat/hydro-morphological issues throughout the Black River system linked to peat extraction and discussed above are numerous and significant. Compliance with the European Water Framework Directive will mean a significant programme of works including measures to address these water quality and habitat/hydro-morphological issues be drawn up and implemented. The development of this facility should be considered only in line with a catchment wide programme throughout the Figile and Slate River to address the numerous issues discussed above.

IFI concerns relating to water quality/quality and concerns linked to the construction development phase include:

- This proposed development is likely to include the clearance of huge areas of peatland habitat/peat. The clearance of this material will act to increase the rate at which water is drawn toward these excavations and will also further dry out surrounding peat-lands thereby increasing ammonia run-off. We ask how the applicant proposes to address this issue.
- Regarding the physical clearance and excavation of peat habitat, mitigation measures which are limited to the control of suspended solids pollution will not address the threat from dissolved nutrients such as ammonia.
- We request that the applicant address the root cause of the elevated ammonia concentrations in surface waters/pumped waters that require treatment on-site.
- All surface waters from the site and access roads should be channeled through adequately sized petrol/oil interceptors prior and be subject to attenuation prior to discharge to surface waters.
- Given the proximity of surface waters draining to the Barrow system the pollution threat from concrete and concrete/cement washings is significant. Good housekeeping is of the utmost importance while using concrete or cement, near watercourses.
- Uncured concrete can kill fish and macro-invertebrates by altering the pH of the water. Concrete delivery vehicles should be precluded from washing out at or in the environs of the site, or at such location as would result in a discharge to surface waters.
- We would also point out that passage of waters (that have come into contact with uncured concrete and have an elevated pH), through silt ponds does not represent adequate treatment.
- If bagged cement is stored on site during construction work, it should be held in a dry secure area when not in use.
- One of the potential impacts of the proposed development is the discharge of silt-laden waters to fisheries streams where earth moving and excavation works are on-going. Silt can clog

COMHAIR[illegible]FHAILÍ
11 MAR 2021
PLANNING

salmonid spawning beds, and juvenile salmonids are particularly sensitive to siltation of gill structures. Similarly, plant and macro-invertebrate communities can literally be blanketed over, and this can lead to loss or degradation of valuable habitat.

- It is important to incorporate best practices into construction methods and strategies to minimise discharges of silt/suspended solids to waters.
- The potential for soil erosion/suspended solids generation is higher, during/after periods of prolonged rainfall. We ask that this be addressed.
- Systems should be put in place to ensure that there shall be no discharge of suspended solids or any other deleterious matter to watercourses during the construction/operational phase and during any landscaping works.
- Stockpiles of sand to be used in the works should be covered with sheeting when not in use to prevent washout of fines during rainfall. Stockpiles of topsoil and associated materials arising during site development should be similarly protected.
- A comprehensive plan should be drawn up at the planning stage with specific measures to address the high potential for silt pollution of the watercourse on-site during construction and landscaping works.
- All oils and fuels should be stored in secure bunded areas, and particular care and attention should be taken during refuelling and maintenance operations on plant and equipment.
- Bunding should be to a volume not less than the greater of the following; 110% of the capacity of the largest tank or drum within the bunded area, or 25% of the total volume of substance that could be stored within the bunded area.
- All plant and equipment should carry oil/fuel spill kits. Where temporary diesel or petrol driven pumps are required, they should be sited within portable temporary bunded units. Where site works involve the discharges of drainage water to receiving rivers and streams, temporary oil interceptor facilities should be installed and maintained.
- Waste oils, empty oil containers and other hazardous wastes should be disposed of in accordance with the requirements of the Waste Management Act, 1996.
- No instream works shall be carried out without the written approval of Inland Fisheries Ireland.

The applicant refers to Ireland's Climate Action Plan 2019. IFI have reviewed the 2019 Climate Action Plan, chapter 1 of which details the critical nature of the challenges, highlighting that average temperatures have risen, oceanic warming, a rise in sea levels, with predictions of further warming and changes to our climate, with extensive direct and indirect harm to Ireland and its people.

The Action Plan details numerous impacts which will cause harm, including:

- Further pressure on water resources, with impacts upon fluvial ecosystems
- More intense storms and rainfall
- Increase chance and scale of river flooding
- Heightened risk of the arrival of new pest and diseases
- Poorer water quality
- Changes in the distribution and time of lifecycle events of plants and animal species

All the above pressures will impact significantly upon the viability of populations of native fish species such as salmon, trout, lamprey and eel in rivers throughout Ireland in the future and IFI welcome the fact that these impacts have been highlighted in this document.
It is clear to IFI that the protection of and long-term viability of ecosystems and populations of protected species is integral to the Climate Action Plan 2019.

COMHAIRLE CHONTAE UÍBH FHAILÍ
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As stated above salmon spawning/recruitment within the Black River catchment is currently limited to small sections of the Slate and Cushina rivers.
Until relatively recently however salmon spawning/recruitment in the Black River occurred over a far wider range, the main reason for the reduction relates to channel modification and water pollution associated with the development of commercial peat production throughout this catchment.
IFI believe that the restoration of salmon spawning recruitment throughout the Black River is integral to improving salmon stocks in the Barrow SAC however significant human intervention is likely to be necessary to facilitate recovery of the fisheries habitat on long stretches of these watercourses.

It is clear that Bord na Mona sees wind-farm development as the long-term change of use for peatland areas over much of the Bog of Allen, in large part to fulfill the requirements of the Climate Change Action Plan 2019. Integral to the Climate Action Plan 2019 is the long-term viability of ecosystems and populations of protected species. Unfortunately, populations of such protected species are very low/absent over large sections of the Black River catchment due to habitat damage/water quality issues associated with the previous use of these landholdings by Bord na Mona. And we believe that issues related to this should be addressed in line with the change of use of these sites by Bord na Mona.

IFI is keen to build on recent water quality improvements in the Black River, which drains 21% of the Barrow River catchment and to restore and increase populations of salmon and other native fish species over large sections of this system. Existing populations within the Black River are an integral component of the Barrow River SAC populations of these species and as these populations expand in numbers and range their importance will increase significantly.
IFI believe that the implementation of restoration plan/plans, throughout the Figile/Black River catchment to address the water quality & hydro-morphological issues referred to above, is integral to the restoration of populations of salmon & other species for which the Barrow River was SAC designated.
In addition the implementation of such a plan will also be central to Ireland's requirements for the implementation of the requirements of the Water Framework Directive.

IFI welcome the Bord na Mona, Biodiversity Action Plan 2016-2021 statement that "*the main aim of rehabilitation will be to re-wet former production areas as much as possible to maximize the benefits for biodiversity and carbon*".
IFI request that applicant include a commitment to river habitat restoration throughout the Figile and Slate systems which drain the large cut-over peatland areas where this development is proposed.

Yours faithfully,

Donnachadh Byrne
Senior Fisheries Environmental Officer

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24

COMHAIRLE CHONTAE LIÚRH FHAILÍ
11 MAR 2021
PLANNING

Shaun Doolin

From: INFO <Information@tii.ie>
Sent: Wednesday 17 February 2021 10:10
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Ms. Mulryan,

I refer to your email of 2 February 2021 regarding the above.

Transport Infrastructure Ireland (TII) wishes to advise that it is not in a position to engage directly with planning applicants with respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the national road network. The developer should have regard, inter alia, to the following;

1. As set down in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, the national road network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.
2. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
3. In relation to cabling and potential connection routing, the scheme promoter should note locations of existing national roads and future national road schemes and develop proposals to safeguard national roads and proposed road schemes. As outlined above, consult with the Local Authority/National Roads Design Office in relation to any schemes in planning in the area, especially on the N22.
   Proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.
   In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. The cable routing should avoid all impacts to existing TII infrastructure, such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.
4. Clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all

structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.

5. Where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines which addresses requirements for sub-threshold TTA.
6. TII Standards should be consulted to determine the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).
7. Assessments and design and construction and maintenance standards and guidance are available at TII Publications that replaced the NRA Design Manual for Roads and Bridges (DMRB) and the NRA Manual of Contract Documents for Road Works (MCDRW).
8. The developer, in conducting Environmental Impact Assessment, should have regard to TII Environment Guidelines that deal with assessment and mitigation measures for varied environmental factors and occurrences. In particular;
    a) TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
    b) The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)).

Notwithstanding any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practice.

I trust that the above comments are of use in your EIAR preparation.

Yours sincerely,

Alban Mills
Senior Regulatory and Administration Executive

Bonneagar Iompair Éireann
Transport Infrastructure Ireland

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 2 February 2021 12:29
To: INFO <Information@tii.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good afternoon,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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GENERAL SCOPING ROUND 2 - 2025 RESPONSES

Lakshmi Priya

From: LO.Offaly.CE <LO.Offaly.CE@garda.ie>
Sent: Tuesday 14 April 2026 10:16
To: Catherine Johnson
Subject: RE: (External)RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (Tullamore Garda)

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Ms.Johnson,

I acknowledge receipt of your correspondence.

Offaly Gardai have no submissions to offer.

Sent on behalf of Superintendent Tony Tighe.

Kathleen Finneran
Teideal an Phoist | Job Title: District Clerk
Rannóg Oibre | Work Section: Offaly Community Engagement
Kathleen.m.finneran'garda.ie
057 9327507
08X XXX XXXX
Garda Station, Tullamore, Co.Offaly, R35 X362
www.garda.ie

Ag Coinneáil Daoine Sábháilte Keeping People Safe

From: Catherine Johnson [mailto:cjohnson@mkoireland.ie]
Sent: Tuesday 14 April 2026 10:13
To: LO.Offaly.CE <LO.Offaly.CE@garda.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Lakshmi Priya <lpriya@mkoireland.ie>
Subject: (External)RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (Tullamore Garda)

This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Good Morning,

I would just like to follow up on the below email, as we would welcome any comments that you may have in relation to the proposed Ballydermot Wind Farm, located in Co. Offaly and Co. Kildare, 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 have any further questions, please let me know. Thank you.

Kind regards,
Catherine

Catherine Johnson BSc. LLM.
Project Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 15:12
To: tullamore.districtoffice@garda.ie
Cc: Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.
It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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Lakshmi Priya

From: BCI Jesmond Harding <conservation.butterfly@gmail.com>
Sent: Thursday 18 December 2025 14:23
To: Aisling Thompson
Subject: Re: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Butterfly Conservation Ireland response to pre-scoping document for Ballydermot Bog Group.docx

You don't often get email from conservation.butterfly@gmail.com. Learn why this is important

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Hello Aisling.

Please find Butterfly Conservation Ireland's response to the pre-scoping document concerning the proposed Ballydermot Wind Farm attached to this email.

Regards,

Jesmond Harding
Conservation Officer
Butterfly Conservation Ireland

On Sat, Dec 13, 2025 at 10:17 PM BCI Jesmond Harding <conservation.butterfly@gmail.com> wrote:

> Dear Aisling,
>
> Thank you for the letter and pre-scoping document.
>
> Our reply is being prepared and will be sent shortly.
>
> Yours sincerely,
>
> Jesmond Harding
> Conservation Officer
> Butterfly Conservation Ireland
>
> On Thu, Dec 4, 2025 at 1:00 PM Aisling Thompson <athompson@mkoireland.ie> wrote:
>
> > Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Butterfly Conservation Ireland in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,

Aisling.

Aisling Thompson

Graduate Environmental Scientist
MKO

Tuam Road, Galway, H91 VW84

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 10:36
To: 'conservation.butterfly@gmail.com' <conservation.butterfly@gmail.com>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-

southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

www.mkoireland.ie



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Butterfly Conservation Ireland
Butterfly House,
Pagestown,
Maynooth,
Co. Kildare.
Phone 01 610 6693
conservation.butterfly@gmail.com

December 18th 2025

Your ref: 250708

Re: Informal Scoping Reporting – EIA Scoping for the Proposed Wind Farm in the townland of Ballydermot and surrounding townlands on the border of County Kildare and County Offaly.

Dear Aisling,

I write in response to your email and the document, *Constraints and Design EIAR Scoping Document*, you provided on 4 December 2025.

The contents were reviewed and our response follows.

According to 2.1 of *Constraints and Design EIAR Scoping Document*, the total area of the Ballydermot Bog Group comprises 5,581 hectares. The extensive area referenced at 2.1 as a 'site' is more accurately described as a biogeographic region, the Bog of Allen.

The extent of the proposed development is extensive, comprising 150km of internal roads, 47 turbines of 200-220m tip height, buildings, tracks, car parks, drainage and large-scale excavation of peat for the installation of underground cabling, pump stations, access roads and entrance.

Our surveys indicate that the region holds extensive biodiversity.

The area holds at least 13 species and seven habitats listed in Annex II and Annex I of the Habitats' Directive respectively, as well as some species listed in Annex V. The recently published document, *The Status of EU Protected Habitats & Species in Ireland, 2025 Summary Report* (Article 17 report) ranks the condition of six of these habitats as 'Bad' and the condition of the remaining habitat type as 'Inadequate.' [1]

The Status of EU Protected Habitats & Species in Ireland, 2025 Summary Report finds that 90% of Ireland's protected habitats are in 'unfavourable' conservation status, while 51% are showing deteriorating trends across their national ranges, which includes sites that are designated as Special Areas of Conservation as well as the wider countryside.

The region also holds 15 amber-listed birds of conservation concern, (19% of amber-listed species) and 11 Red-listed birds (20% of the red-listed bird species).

The Lullymore/Lullybeg area ranks as one of Ireland's three important butterfly areas.[2]

[1] https://www.npws.ie/sites/default/files/publications/pdf/article-17-report-2025-volume-1.pdf
[2] Van Swaay, C.A.M., Warren, M. (2006). *Prime Butterfly Areas of Europe: an initial selection of priority sites for conservation*. Journal of Insect Conservation (2006) 10: 5–11 _ Springer 2006 DOI 10.1007/s10841-005-7548-1

The region supports hundreds of moth species, including some rare and threatened macro-moths. The rare moth Suspected *Parastichtis suspecta*, declared Regionally Extinct (in Ireland) in 2016 [3] was rediscovered in the region.

The region contains 26 of Ireland's 35 butterfly species, including four species ranked with a threat category under the IUCN criteria. [4] Lullybeg is one of only five locations in the Republic of Ireland where 100 plus Marsh Fritillary adult butterflies have been recorded in one 10km square. [5] The region holds a number of colonies, operating within the landscape as a functioning metapopulation.

Article 3 of the EIA Directive states that an EIAR must 'describe and assess in an appropriate manner, in the light of each individual case, the direct and indirect significant effects of a project on the following factors: […] (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC". Annex IV, point 4 of the EIA Directive requires a "description of the factors specified in Article 3(1) likely to be significantly affected by the project: […] biodiversity (for example fauna and flora)."

We expect that these assessments will be carried out.

The Wildlife (Amendment)Act 2000 Section 9 (a) and (b) inserted an extra function on the Minister "*to promote the conservation of biological diversity*" and it defined 'biological diversity' "*as meaning the variability among living organisms from all sources, including terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part and 'diversity' includes diversity within species, between species and of ecosystems."* [6]

How is the conservation of biological diversity served by this proposal on state land?

The impacts of the proposed plan will be to completely change the visual character of the landscape. The extensive road network, turbines and drainage will alter the condition and connectedness of the habitats, impacting some species immediately and others in the medium and longer term. It is difficult to envisage how peatland rehabilitation/carbon sequestration could be undertaken in such an extensive, widely dispersed cluster-based layout.

The turbines are likely to create immediate impacts for birds. The collision modelling applied for a wind farm application in SW Donegal has proved inaccurate, with three White-tailed Eagles killed in collisions with wind turbines in a 12-month period. The collision risk modelling predicted just 0.09 collisions per year, equivalent to one bird killed every 10.8 years. [7] The region's birds would be put at unnecessary risk. Whopper Swans frequently fly during low light and at night, from grazing land located to the northeast of the region to roost in the wetlands in Lullybeg. The erection of turbines between the roosting site and the foraging area would create an unacceptable collision risk for this species and many others. The cumulative impacts of all the wind farms in Kildare and Offaly should also be considered in this regard.

It should be noted that Butterfly Conservation Ireland suggested that a spatially concentrated development should be considered on an area of highly degraded peatland west of the Rathangan/Edenderry Road. This suggestion was made on 23 February 2023 at a meeting between

---

[3] https://biodiversityireland.ie/app/uploads/2021/04/RL9-Moths-final-version-010616.pdf

[4] Regan, E.C., Nelson, B., Aldwell, B., Bertrand, C., Bond, K., Harding, J., Nash, D., Nixon, D., & Wilson, C.J. (2010) Ireland Red List No. 4 – Butterflies. *National Parks and Wildlife Service*, Department of the Environment, Heritage and Local Government, Ireland.

[55] Cremin, R. (2025) Marsh Fritillary (*Euphydryas aurinia*). Pp. 92-93, In Harding & Lysaght (2025) An Atlas of Butterflies in Ireland 2010-2021. The National Biodiversity Data Centre Waterford.

[6] https://data.oireachtas.ie/ie/oireachtas/act/2000/38/eng/enacted/a3800.pdf

[7] https://www.donegaldaily.com/2025/10/02/three-white-tailed-eagles-killed-by-wind-turbines-in-south-donegal-1/

environmental NGOs and a representative from Lullymore Heritage Park with Emma Keyes Stakeholder Executive and three of her project team colleagues at Lullymore Heritage Park.

The pre-scoping document quotes from the Kildare County Development Plan 2023-2029,[8]omitting relevant information, including the nationally important sites listed in the Plan within the boundary of the proposed wind farm. One example is: Lullybeg Butterfly Reserve - Ballydermot (Lullymore) Easting 668197.8 385 Northing 725616.40 23. This reserve is operated by Butterfly Conservation Ireland.

Among several relevant unquoted objectives in the Kildare County Development Plan are the two following.

RD O36: Support the development of a National Peatlands Park in co-operation with Bord na Mona, NPWS, Inland Fisheries Ireland, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011, Action A28 of the National Peatland Strategy 2014 and the Local Just Transition Plan for West Kildare 2022.

RD O37: Recognise the importance of cutover and cutaway bogs in providing some critical ecosystem services such as potential carbon sinks. Cutover bogs should be identified for immediate management interventions to prevent further degradation, particularly the ongoing loss of their carbon store.

At 12.14.6.5 the Kildare County Development Plan contains, inter alia, this statement:

While Bord Na Mona has clear intentions of developing extensive areas to meet government renewable targets – in the form of wind and solar farms - nonetheless, the Bog of Allen represents a unique opportunity for nature based solutions on a grand scale to address the national biodiversity crisis and climate change mitigation.

We suggest that a comprehensive examination of the Kildare County Development Plan 2023-2029 be undertaken to review the current proposal.

Wind turbines should be located on land that is poor for biodiversity. This solution is available in the region, west of the Rathangan/Edenderry Road.

I hope these comments are useful to your deliberations.

Yours sincerely,

Jesmond Harding

Conservation Officer
Butterfly Conservation Ireland

Directors: Michael Jacob [Chairman] Jesmond Harding, Kieran Buckley, Joseph Harding, Richella Duggan.

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[8] https://kildarecoco.ie/AllServices/Planning/DevelopmentPlans/KildareCountyDevelopmentPlan2023-2029/Volume1Chapters1-17/

Aisling Thompson

From: Roger Woods <rwoods@bai.ie>
Sent: Tuesday 13 January 2026 15:04
To: Aisling Thompson
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Hi Aisling

Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed sub station is not located close to any existing or planned FM transmission sites.

Can you also please update our company records on your system, in particular the address as noted below.

Regards

Roger
Innealtóir Feidhmiúcháin Sinsearach | Senior Executive Engineer

T: +353 (0)1 644 1200 | rwoods@cnam.ie

Coimisiún na Meán

1 Áras Shíol Bhroinn, Bóthar Shíol Bhroinn, Baile Átha Cliath, D04 NP20, Éire.
1 Shelbourne Buildings, Shelbourne Road, Dublin, D04 NP20, Ireland.

Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda agus is leis an duine sin amháin a bhfuil siad seolta chuige/chuici a bhaineann siad. Muna duitse an ríomhphost seo, ní ceart é a léamh ná a scaoileadh chuig aon tríú páirtí. Iarrtar ort teachtaireacht a sheoladh chuig an seoltóir nó chuig info@cnam.ie, agus an ríomhphost seo a scrios.

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Déan machnamh ar an timpeallacht, le do thoil, roimh an ríomhphost seo a phriontáil.

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From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Tuesday 13 January 2026 12:03
To: Roger Woods <rwoods@bai.ie>; Reception CnaM <info@bai.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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Lakshmi Priya

From: Martin O Donoghue <Martin.ODonoghue@comreg.ie>
Sent: Wednesday 18 March 2026 17:08
To: Aisling Thompson; Sinead French; Conor Berkeley; Tara Kavanagh; Licensing; Margaret O'Sullivan
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Hi Aisling,

The information you require is published on https://siteviewer.comreg.ie/
Information regarding Siteviewer is available here Siteviewer | Commission for Communications Regulation

ComReg does not carry out any assessment of potential interference from wind energy developments. You need to contact the licensees directly.

Kind regards,

Martin O'Donoghue
Innealtóir Speictrim Raidió
Radio Spectrum Engineer

An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

1 Lárcheantar na nDugaí, Sráid na nGildeanna, BÁC 1, Éire, D01 E4X0.
One Dockland Central, Guild Street, Dublin 1, Ireland, D01 E4X0.
Rphost | Email martin.odonoghue@comreg.ie
Suíomh | Website www.comreg.ie

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From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Wednesday 18 March 2026 16:16
To: Sinead French <sinead.french@comreg.ie>; Conor Berkeley <conor.berkeley@comreg.ie>; Tara Kavanagh <tara.kavanagh@comreg.ie>; Licensing <licensing@comreg.ie>; Margaret O'Sullivan <margaret.osullivan@comreg.ie>

Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good afternoon,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Ballydermot Wind Farm Development. If so, can you please get back to me at your earliest convenience.

Thank you very much.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Aisling Thompson
Sent: Tuesday 13 January 2026 12:17
To: 'sinead.french@comreg.ie' <sinead.french@comreg.ie>; 'conor.berkeley@comreg.ie' <conor.berkeley@comreg.ie>; 'tara.kavanagh@comreg.ie' <tara.kavanagh@comreg.ie>; 'licensing@comreg.ie' <licensing@comreg.ie>; 'margaret.osullivan@comreg.ie' <margaret.osullivan@comreg.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with

infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

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Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
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Tá an ríomhphost seo, chomh maith le haon iatáin a bhaineann leis faoi rún agus d'fhéadfadh leis a bheith faoi phribhléid nó cosanta ó aon nochtadh. Is don seolaí(aithe) ainmnithe thuas amháin é. Níl sé ceadaithe go mbeidh rochtain ag éinne eile ar an ríomhphost seo. Más rud é nach tusa an faighteoir ainmnithe, ná cló amach, léigh, cóipeáil, nocht d'éinne nó bain úsáid as an eolas sa ríomhphost seo in aon tslí eile, le do thoil. Más rud é go bhfuair tú an ríomhphost seo trí earráid, dean teagmháil leis an seoltóir láithreach agus scrios an t-ábhar ina iomlán, bíodh sé i gcóip leictreonach nó chrua.

An Roinn Talmhaíochta,
Bia agus Mara
Department of Agriculture,
Food and the Marine

MKO
Tuam Road
Galway
H91VW84

16th January 2026

Re: **Prroposed Ballydermot Wind Farm Development near Edenderry, Allenwood, Rathangan, Clonbullogue Village, CO. Offaly and Kildare.**

Dear Sir/Madam,

The following are the comments from this Division in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from the Department's website link here: gov.ie - Tree Felling Licences (www.gov.ie)

A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017).

The developer should take note of the contents of **Felling and Reforestation Policy** document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; gov.ie - Tree Felling Licences (www.gov.ie) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.

In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications. This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

Consequently, when the Forest Service is considering an application to fell trees, the following applies:

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: gov.ie - Felling Licence Applications (www.gov.ie)

3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published on the Departments Forestry Licence Viewer 9FLV) link here: Forestry Licence Viewer (agriculture.gov.ie)

It is important to note that when applying to **a Local Authority**, or **An Bord Pleanàla**, for planning permission where developments are:

a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or

b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and

c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,

1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;

and

2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanàla, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.

3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

Neil O’Brien
Higher Executive Officer
Felling Section

Aisling Thompson

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Tuesday 30 December 2025 10:33
To: Aisling Thompson
Cc: Defence Property Management Planning
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

You don't often get email from propertymanagementplanning@defence.ie. Learn why this is important

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Without Prejudice

Dear Ms. Thompson,

I refer to your below e-mail, dated 4th December 2025, in relation to a Proposed Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

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- A portion of the proposed Ballydermot Wind Farm lies within 20NM of Casement Aerodrome DVOR/DME.
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- The cumulative effect of renewable energy developments has the potential to impede the Irish Air Corps operability.

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.

Any IAC requirements for are separate to Irish Aviation Authority (IAA) requirements.

We would appreciate if you could keep us informed on any progress relating to this proposed development.

We are available to discuss the proposed development further if required.

Kind Regards

Damien.

Damien Tyrrell

Property Management Planning

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93

propertymanagementplanning@defence.ie

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:30
To: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Mr Don Watchorn,

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Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,

Aisling.

Aisling Thompson

Graduate Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

mkoireland.ie | +353 (0)91 735 611

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 10:48
To: 'Gareth.OFlaherty@defence.ie' <Gareth.OFlaherty@defence.ie>; 'Raymond.Myles@defence.ie' <Raymond.Myles@defence.ie>; 'ciaran.desmond@defence.ie' <ciaran.desmond@defence.ie>; 'eilish.keating@defence.ie' <eilish.keating@defence.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

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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.

Kind regards,

Karen.

Karen Mulryan

Environmental Scientist

MKO

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

www.mkoireland.ie



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Lakshmi Priya

From: Catherine Johnson
Sent: Monday 20 April 2026 08:14
To: Defence Property Management Planning
Cc: Ciarán Fitzgerald; Lakshmi Priya; Ellen Costello
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (DoD)

Hi Damien,

Thank you so much for getting back to me. I will look to see what dates would suit the team and look to get these back to you as soon as possible.

Kind regards,
Catherine

Catherine Johnson BSc. LLM.
Project Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

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From: Defence Property Management Planning
Sent: Thursday 16 April 2026 12:06
To: Catherine Johnson
Cc: Defence Property Management Planning
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (DoD)

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Good Afternoon Catherine,

We are looking to schedule an online Teams meeting within the next 2/3 weeks.
Which dates would be convenient for you? I can then liaise with my colleagues regarding their availability.

Many Thanks,

Damien.

Damien Tyrrell

Property Management Planning

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93

propertymanagementplanning@defence.ie

From: Catherine Johnson <cjohnson@mkoireland.ie>
Sent: Tuesday 14 April 2026 09:45
To: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (DoD)

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Hi,

My name is Catherine Johnson, and I am the project manager on the Ballydermot Wind Farm Project.

Thank you for the below scoping response received on the 30th of December 2025 .

We are writing to request a meeting with the Department of Defence in order to discuss the proposals for the site.

A draft agenda is provided below:

- MKO to provide an overview of the Proposed Project,
- MKO and Al to provide an overview of surveys undertaken on the site to date
- MKO and AL to provide overview of Proposed Haul Routes, including diversion routes and structural assessment surveys
- DoT to offer feedback on the project

The meeting is requested to obtain any insights from the Department of Defence in relation to the Proposed Project.

The following to attend the meeting:

-Catherine Johnson and Ellen Costello (MKO Environmental Scientist/EIAR Project Manager)
-Julie Larkin (BNM Project Manager)
-Peter Foulsham (Cyrrus – Aviation Specialist)

-Kevin Hayes (Ai Bridges – Aviation and Radar Specialist

Please let me know your availability for a meeting on the above. Thank you in advance.

Kind regards,
Catherine

Catherine Johnson BSc. LLM.
Project Environmental Scientist

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From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Tuesday 30 December 2025 10:33
To: Aisling Thompson <athompson@mkoireland.ie>
Cc: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Aisling Thompson

Graduate Environmental Scientist

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Sent: Tuesday 2 February 2021 10:48
To: 'Gareth.OFlaherty@defence.ie' <Gareth.OFlaherty@defence.ie>; 'Raymond.Myles@defence.ie' <Raymond.Myles@defence.ie>; 'ciaran.desmond@defence.ie' <ciaran.desmond@defence.ie>;

'eilish.keating@defence.ie' <eilish.keating@defence.ie>
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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.

Kind regards,

Karen.

DOD MEETING MINUTES

Project Reference	Ballydermot Wind Farm (250708)
Date & Time of Meeting	19th of May 2026 @ 15:00
Subject	Department of Defence and Ballydermot Wind Farm Project Team discussion on the Ballydermot Wind Farm
Venue	Microsoft Teams
Participants	**MKO:** Ellen Costello (EC), Catherine Johnson (CJ) Ciarán Fitzgerald (CF), **BnM:** Muriel Ennis (ME), Caitríona Carter (CC) **Cyrrus**: Peter Foulsham (PF) **AI Bridges:** Kevin Hayes (KH) **Department of Defence (DoD):** Eoin McDonnell (EMcD), Sarah Kelly (SK), Philomenta Evans (PE), Christina Hickey (CH), Stewart Begley (SB) **Irish AirCorps:** Warren Downey (WD)
Author(s)	Ciarán Fitzgerald (CF), Catherine Johnson (CJ)

Table 1 Meeting Minutes

Item	Description
1.0	**CJ** opens the meeting with an introduction and asks all attending the call to intrduce themselves
2.0	**Meeting Agenda** **CJ** runs through the agenda
3.0	**Introduction to the Appliocant** **ME** provides an introduction to BnM. **ME** discusses how BnM have transitioned away from peat production towards Renewable Energy development and peatland rehabilitation.

	ME hightlights the large landbank owned by BnM and the list of current renewable energy projects
4.0	**Benefits of the Proposed Project** **CJ** discusses the proposed project benefits, noting the importance of the Ballydermot Wind Farm having the opportunity to be granted permission in order to capture Ireland's valuable wind energy resource.
5.0	**Site Location** **CJ** gives background to the site location, noting the tall structures present including: 47 no. wind turbines (20 no. with a tip height (TH) of 200m and 27 no. with a TH of 220m), 1 no. relay mast, 2 no. meteorological masts, and 2 no. telecommunications masts. She notes the planning application boundary and that the site sits within Co. Kildare, on the Offaly border.
6.0	**Aviation Designations** **PF** notes that he has been working on the project since 2021. He also notes that the project team is not disputing that the site sits within aviation designations, specifically EI-R-16 B and C sectors He further notes that the Proposed Project overlaps with the Eddenderry low flying training area.
7.0	**Aviation Assessment** **PF** discusses the aviation assessment methodology and notes key impacts from the proposed establishment of the Ballydermot Wind Farm including limited ability to transition directly overhead the windfarm whilst not infringing on restricted airspace. **PF** concludes the slide by noting that there is no physical penetration of the restricted airspace above the Project Site and aircrafts could pass overhead whilst complying with Minimum Height regulations
8.0	**Low Flying Triaing Areas** **PF** notes that the Defence Forces – Irish Air Corps / Public Info / Aeronautical Data / EIME AD 2-23 website was used to identify low flying routes, but **PF** could only find reference to low flying routes in the Wicklow mountains and it needs to be clarified what type of low flying the Edenderry low flying area is being used for , and how often. **PF** notes its most likely 500ft is probably what they are flying sometimes down to 250ft low flying is a critically military skill and we recoginise that.
9.0	**Aerodrome Safegaurding** **PF** notes that the prosopsed wind farm is at a distance that will not have a technical safeguarding impact on casement aerodrome, for example ILS, VOR, etc. **PF** notes no physical penetration of the restricted airspace and a aircraft could pass overhead **PF** identifies that the Proposed Project site is 16NM from the Casement Aerodrome As already mentioned the Proposed Project is located in the Edenderry Low Flying Training Areas and **PF** notes that aircrafts could fly at 500ft above ground level (AGL) when encountering an obstacles such as turbines **PF** notes its difficult to put together a plan when there is very little information online but again notes that is understandable given the confidentiality of the DoD in all countries

	PF outlines that fast jets are interacting with wind farms in the UK all the time and that they could easily avoid turbines **PF** believes it is unlikely that Casement AerodromeIFPs would be impacted, but he's not an IFP designer and therefore an IFP specialist would need to review to confirm that assessment.
10.0	**Radar Impact Assessment** **KH** opens to say he was contracted by MKO to do a radar assessment **KH** notes the Radar impact methodology as noted in the RIA slide **KH** outlines that the predominant impact turbines have on secondary surveillance radar (SSR) are actually from the turbine hub rather than the blades. When assessing the potential impact of wind farms on aviation radar, KH notes that the the worst case scenario is when the turbines are oriented at a perpendicular angle to the radar, as this maximises the radar cross-section of the hub and produces the greatest level of interference. **KH** notes that a ASR or primary surveilnace radar (PSR) facility /SSR assessment has not been completed for Casement due to a lack of publicly available data. Also there are no Proposed Turbines within 16km from the civil aviation SSR radars or and within 15km of the Irish Air Corps ASR Facility at Casement.
11.0	**Radar Assessment Baseline/Radar LoS Modelling** **KH** outlined that to date a Civil Aviation Assessment Approach according to EuroControl Guidelines has not been completed against the ASR facility at Casement to date as it has not been deemed necessary for this assessment **KH** notes that they have completed Radar Line of Sight (LoS) modelling with the proposed dimensions (i.e., 20. No turbines w/ a TH of 200m and 27 no. turbines with a TH of 220m) – no difference in results and that only 19 no. Proposed Turbines are detectable by the radar and are within 20NM of the airport surveillance radar (ASR), and a total of thirteen turbines are within radar line of sight and within the 20NM bounded area for radar vectoring coverage. These thirteen turbines will be under the 2000 ft threshold indicated in the ATC Radar Vectoring Chart with clearances of over 1000 ft from the highest turbine tip height. **KH** outlines that of the 13 no. turbines within the radar impact range, all 13 are below the minimum initial altitude of the radar vectoring chart clearances of 2000ft **KH** notes that the assessment of the 27 no. Propoed Turbines located within EI RI6 C have been subject to a RLoS Assessment which will be supplied as appendix to the EIAR **KH** notes that the all the Proposed Turbines fall with the Dublin control area but none are within the Dublin airport control zone
12.0	**Instrument Approach ILS W CAT I on RWY 10 (EIME AD 2.24-33)/Radar Vectoring for Instrucuiment Approach** **KH** provides an example relating to instrument approach on an airport runway (RNWY 10). Flagged that the identified holding pattern in the example, i.e., prior landing on RNWY 10, had been superimposed over the terrain with the Proposed Turbines included in the figure to assess the impact.

	KH concludes that the Radar Vectoring for Instrument Approach ILS W CAT 1 RWY 10 holding pattern in restricted R16 area is not likely to be impacted, that the MHA of 3000ft for holding pattern for final approach is not impacted, and that the IAF for Final Approach of 1800ft - minimum radar vectoring threshold – is not likely to be impacted and that this is subject to further confirmatory assessments. **KH** notes there are not expected impacts on Instrument Approach but flagged an IFP specialist would need to review to confirm that assessment.
13.0	**Cumulative Effects** **PF** discusses the cumulative effects noting that there are 11 no. existing, permitted or proposed wind farm developments within 25km of the Proposed Turbines with the nearest developments being Cushaling and Cloncreen **PF** notes that with several wind farms already in the surrounding area, flight planning is probably already at higher altitudes and that routing to avoid the particular area would already be the most likely approach. **PF** notes that the cumulative assessment for aviation will cover restricted airspace, radar, and aerdrome safeguarding
17.0	**CJ** discusses Proposed Project timelines. Notes the EIAR will have a dedicated Avaiaiton Chapter, Chapter 16, and further consultation is going on
18.0	**WD** notes he has concerns with the proposal, and while **WD** accepts the majority of detail presented in the meeting, the context of the actual land use needs to be reviewed against the presentation. **WD** notes the uses of the area identified is slightly different to how they are actually being used but this is due to the information not being publicly available. **WD** requests that the presentation be issued for further review. **SK** agrees, noting the degree of technical information presented and that the DoD and Air Corp need time to digest it **EMcD** notes MKO (and team) have prepared well but all of the DoD data is not publically available and the slides need to be passed onto the Radar team for review **WD** wants to note the IFP assessment, identifies that the assessment will need to provide more than detail than looking at published charts and altitude; the area is highly regulated area, there are primary and secondary regulations that aren't noted which would need to be considered insofar as possible **WD** notes he is happy with the approach to undertake a further IFP assessment **EMcD** notes they want to go away and discuss internally the detail. **SK** notes that they are quite active in this space and that **WD** is expert and that **WD** gave feedback in the scoping feedback but each individual WF is different. **CJ** identified that the presentation and meeting minutes will be issued but if there are any key points they would like to discuss the Ballydermot Project Team is available for discussion. **WD** has three main headings for feedback

- Ballindonnel 20NM
  - Notes the IFP Assessment and recommends that a formal assessment is carried out
    - Departures and arrivals and total pictures they want to see
    - Noted Sagentia as a key company to contact (Liam Clark noted as a key point of contact) as Sagentia has all Air Corp aeronautical data
  - Notes a Air Corp CSN radar coverage needs to be addressed (further assessment may also be required)
- Low Flying Training Zones
  - Notes that there are two types of Low flying – two types (pilots and low level training are transiting above the area,) (second one is for training garda, medical airservice, low level flight below 500 ft), need a obstacle free flat zone for inexperienced pilots
    - **PF** queried if it is helicopters carried out low flying training
    - **WD** confirms it is helicopters and notes that Fixed Wing is most common in that area but the real low level is for helicopter crews
- Freedom of Navigation
  - Identifies that Restricted Aispace, MOA is from the surface, for aircraft to fly over a WF in the 1500 ft AGL sector no aircraft wont be able to fly over a WF **WD**

WD notes that the cumulative effect will cut off navigational route for both civil and military going to Weston, Casement and Dublin zone.

EMcD notes there are discussions about Ireland may get fast jets in the future

CC asked if the DoD could propose any mitigation.

WD notes commissioning an IFP report as soon as possible and suggest Sagentia Aviation , Liam Clarke. They are really busy atm so get that going as soon as possible

WD also hold notes that Sagentia Aviation hold the necessary data for Casement Aerodrome for IFP assessment.

PF asks **WD** if he could include a hypothetical description of aircraft departing the base, completing their training and returning to Casement Aerodrome. within the bounds of information WD is permitted to divulge. **WD** also confirmed that when the presentation is issued, he will review and come back with further feedback.

Aisling Thompson

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Thursday 4 December 2025 18:49
To: Aisling Thompson
Cc: Ellen Costello; Catherine Johnson; Ciarán Fitzgerald
Subject: DAU Ref: G Pre00396/2025 RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Our Ref: G Pre00396/2025 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

Please note that the Development Applications Unit (DAU) is the co-ordinating unit for the Department of Housing, Local Government and Heritage, co-ordinating responses/submission from National Parks and Wildlife Service, National Monuments Service, the Underwater Archaeology Unit and Architectural Heritage.

All Correspondence in relation to preplanning consultations is to be issued to Development Applications Unit. To avoid confusion and reduce the risk of duplication correspondence should not be sent to other sections of the Department such as to the Minister's Office.

In the event of observations, you will receive a co-ordinated heritage-related response by email from the Development Applications Unit (DAU).

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

If you have not heard from DAU and wish to receive an update, please email manager.dau@npws.gov.ie.

Kind Regards
Sinéad

—
Sinéad O' Brien
Executive Officer
—
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90
Newtown Road, Wexford, County Wexford Y35 AP90
—

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 12:56
To: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Mr Hills,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Developments Applications Unit in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 10:42
To: 'Manager.Dau@ahg.gov.ie' <Manager.Dau@ahg.gov.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan

Environmental Scientist

MKO
Tuam Road, Galway
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+353 (0) 91 735611
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An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Your Ref: 250708
Our Ref: **G Pre00396/2025**
(Please quote in all related correspondence)

21 January 2026

MKO
Tuam Road
Galway
H91 VW84

Via email: athompson@mkoireland.ie

Re: Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

A chara

I refer to correspondence dated 4 December 2025 received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

Visibility analysis for vantage point surveys

The application site is characterised by industrial cut-over bog that is both predominantly flat and revegetating with scrub and secondary woodland. Consequently, it is important to site vantage point surveys to ensure adequate visibility. The Department recommends that a visibility analysis is undertaken that includes the surface of the vegetation such as scrub or emergent woodland. This is best undertaken using a digital surface model (DSM), i.e. a model that includes the height and surface of the vegetation relative to the viewing point. This analysis should then be used to determine the number and location of the vantage point surveys necessary to ensure appropriate coverage of the application site and its zone of influence. This analysis will ensure that the flight data produced to inform the collision mortality model is accurate and that there is sufficient confidence in its results.

Breeding Curlew Surveys

The National Parks and Wildlife Service (NPWS) of this Department has records for Curlew during the breeding season within the application site. These surveys have established the area as a potential breeding location for Curlew and confirmed use as a feeding site during the breeding season. Consequently, it is recommend that surveys are undertaken to establish the distribution and abundance of Curlew during the breeding season within all habitat located within the zone of influence of the proposed application that are considered suitable for breeding curlew. To determine the zone of influence of the application site in relation to breeding curlew it should be considered that Curlew are known to move potential

nest locations between years by up to approximately 1km (NPWS, 2022)[1]. It should also be considered that the core foraging range for nests is approximately 2km and may be more in areas where habitat is fragmented[2]. The Department recommends that best practice distribution and abundance surveys are undertaken for breeding curlew. This should entail three to four survey visits during the breeding season following best practice methodologies (see NatureScot, 2025[3], and/or NPWS, 2022[4]).

Contextualisation of any impacts on Breeding Curlew

If it is determined that there is potential for either collision mortality, or disturbance and displacement impacts on breeding curlew it is recommended that those impacts are contextualised first in terms of the local and/or regional breeding population before they are then contextualised in terms of the national breeding population. The population of breeding Curlew in Ireland is fragmented and unevenly distributed across the country. Adult breeding Curlew have a high site fidelity, while juvenile Curlew are likely to have a relatively high natal philopatry and a relatively low dispersal rate[5]. Consequently, it is likely that immigration rates are likely to have a negligible factor in the current population dynamics of Curlew in Ireland, which is likely dominated by adult survival and juvenile recruitment at the local level. Consequently, local and regional populations may be considered as sub-units for the purposes of analysis. Consequently, any potential mortality or displacement impacts on a local/regional populations may have a nationally significant effect if they result in the local loss of adult breeding birds, or decreased recruitment, as this may result in changes to the range of the species in a national context (i.e. impacts hasten the local or regional extinction of the species).

Breeding Nightjar Surveys

The National Parks and Wildlife Service of this Department has previously recorded breeding Nightjar within the Long Derries, Edenderry Special Area of Conservation (SAC) (see NPWS, 2021[7]). Consequently, it is recommended that distribution and abundance surveys following best practice methods are undertaken for this species to determine its current status in the vicinity of this site, and subsequently inform any assessment of potential impacts should it be present. The Department recommends that surveys should be undertaken in all suitable habitat, particularly any clear-fell forestry, any young forestry plantations, and any heath (including anthropogenic heath on cutover bog), in the vicinity of the Long Derries, Edenderry

[1] Colhoun, K., Flannelly, F., O'Neill, J., Phelan, E., Servignat, H., O'Donoghue, B. & Kelly, S. (2022) Status and distribution of breeding Eurasian Curlew in Ireland 2021. Irish Wildlife Manuals, No. 138. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland

[2]Colclough, Gary. "Home Range of the Eurasian Curlew (*Numenius Arquata*) during the Breeding Season." University College Dublin. School of Biology and Environmental Science, 2024.

[3] Naturescot (2025) Recommended bird survey methods to inform impact assessment of onshore windfarms.

[4] Colhoun, K., Flannelly, F., O'Neill, J., Phelan, E., Servignat, H., O'Donoghue, B. & Kelly, S. (2022) Status and distribution of breeding Eurasian Curlew in Ireland 2021. Irish Wildlife Manuals, No. 138. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland

[5] Bainbridge, I. P., & Minton, C. D. T. (1978). The Migration and Mortality of the Curlew in Britain and Ireland. Bird Study, 25(1), 39–50.

SAC. These surveys should broadly follow the methodology outlined for Nightjar in Gilbert et al (1998)[6].

Potential for Biodiversity Enhancement measures within the application site

The Department notes that the Long Derries, Edenderry SAC is located within the application and predominantly owned by both the applicant, Bord na Móna, and Coillte. Consequently, there may be an opportunity to consider appropriate conservation measures at this site to help deliver the conservation objectives within the context of any biodiversity enhancement measures being proposed for the current application (should there be no such measures currently in place). The qualifying interest of the Long Derries, Edenderry SAC, the Annex I habitat [6210] Orchid-rich Calcareous Grassland*, was considered by the National Parks and Wildlife Service of this Department to be under threat from scrub encroachment and under-grazing[7]. Consequently, there may be some potential for appropriate scrub management and/or the establishment of an appropriate grazing regime, should these measures not already occur at the site.

The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/ies, in their role as statutory consultee under the Planning and Development Act, 2000, as amended.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

Edel Griffin
Development Applications Unit
Administration
Tel: 053-911

[6] Gilbert, G., Gibbons, D.W. & Evans, J. (1998) Bird Monitoring Methods. RSPB.
[7] NPWS (2021) Conservation Objectives: The Long Derries, Edenderry SAC 000925. Version 1. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Lakshmi Priya

From: Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>
Sent: Thursday 8 January 2026 17:50
To: Aisling Thompson; Transport GCU
Cc: Catherine Johnson; Ellen Costello; Ciarán Fitzgerald
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: 20250107 DoT Submission.docx

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Good afternoon,

Please find attached for your attention submission from Department of Transport in relation to a proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

Kind regards
Jacqui

Jacqui Traynor
Central Policy, Coordination and Reform
An Roinn Iompair
Department of Transport
Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60
T +353 (0)1 604 1177
gcu@transport.gov.ie www.gov.ie/transport

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:45
To: Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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NPWS Meeting Minutes

Project Reference	250708 Ballydermot		
Meeting Purpose	Meeting with NPWS to discuss the Proposed Project		
Meeting Time/Date	26.05.2026 @ 10.30	Location	Teams Meeting
Author(s)	CJ	Issue Date	N/A
Doc. file name	NPWS Meeting Minutes – 2026.05.26 - 250708		

Attendees	**Name/Abbreviation**	**Title**
	(EoC) Eoin Connolly	NPWS Representative - Ecologist Grade II
	(JL) Julie Larkin	BnM – Senior Project Manager
	(EH) Ellen Hilliard	BnM – Junior Project Manager
	(ME) Muriel Ennis	BNM – Planning Programme Manager
	(CC) Chris Cullen	BnM – Ecology
	(EC) Ellen Costello	MKO Environment
	(CJ) Catherine Johnson	MKO Environment
	(SM) Sarah Mullen	MKO Ecology
	(KOD) Kate O'Donnell	MKO Ecology
	(KB) Katy Beckett	MKO Ecology
	(PC) Padraig Cregg	MKO Ornithology
	(PM) Patrick Manely	MKO Ornithology
	(AJ) Aoife Joyce	MKO Ecology - Bats
	(MOH) Molly O'Hare	MKO Ecology - Bats

Item	Description
1.	Introductions
2.	MKO ENV Presentation on Ballydermot Wind Farm Project.
3.	MKO ECO Presentation on the ecological aspects of Ballydermot Wind Farm Project

4.	**Site Characterisation**
	• **EoC** queried characterisation
	  ○ For the purposes of turbary cutover where there is raised bog, recommended MKO/BnM consider the classification produced by the NPWS Wildlife Manuals to ensure categorisation of bog and bog woodland is correct (basic system to identify low to high sphagnum raised areas)
	  ○ **KOD** confirmed it will be included in the assessment as a key guidance document
	
	Bat Activity
	• **EoC** queried bat activity levels – are they quite low / what mitigation measures are being proposed?
	  ○ **MOH** – confirmed it is the general suite (blade feathering), and standard bat mitigation measures and lighting and noise restrictions
	
	Future Trends
	• **EoC** – outlined that succession will be a key feature on the site, queried what is being done to ensure that the proposed areas will remain suitable for marsh fritillary? (NPWS would be looking out for this in the EIAR)
	• **EoC** – queried the requirement for an IPC licence, for the purposes of the EIA for the wind farm, the baseline for the IPC rehabilitation proposals are covered in the Do-Nothing scenario and differentiating between this scenario and the works for the proposed wind farm (ensuring enhancement is also differentiated)
	  ○ Acknowledged how these can work cohesively but wants to make sure this is clearly outlined in the EIAR as a separate element
	  ○ **KOD** – confirmed draft rehabilitation plans are being considered for the assessment of future trends but welcomes the feedback. Enhancement areas have been designed with the future plans considered for the site
	  ○ **EoC** – asked what the approach is and if MKO/BnM are happy with the way to separate it
	  ▪ **ME** – confirmed that BnM and MKO are working on making this clearer in the application. When putting a wind farm on an IPC Licence site, the draft rehabilitation plan and requirement for rehabilitation under Condition 10 is fully considered to ensure adherence to EPA requirements

Item	Description
	• Enhancement and mitigation measures are brought in and layered on top of the IPC requirements as a separate element • **EoC** – recommended putting in an explanation of the approach within the EIAR methodology section – i.e., what is being done under IPC and what is being done as part of Proposed Project enhancement ▪ **EC** – acknowledged the points made above, outlined the Lemanaghan WF project and the works done to describe the rehabilitation plans in detail and outlining what will be done on site from an ecological, ornithological, hydrological perspective. The discipline specific assessment is considered against this rehabilitation plan/future trends and this is considered in a likely future baseline scenario • Will create a section on what IPC license activities are occurring and outline clearly where this is discussed within the chapter under relevant disciplines. Will take points away and ensure included in the EIAR • **EoC** – understands the approach but wants to make sure it can be brought into as much detail as possible in as plain a way as possible to ensure the interaction between IPC license and enhancement is considered
5.	MKO ORN Presentation on the ornithological aspects of Ballydermot Wind Farm Project, (only talking points additional to slides indicated below) • Shifting baseline – impact assessment is based on the results of the past 6 years of surveys ○ Will be considering the baseline shift – i.e., key outcome is that habitat will be scrubbed over which will make the site less suitable for birds
6.	**Breeding Curlew** • **EoC** – on breeding curlew, queried if they are on the species list to be impacted during the breeding season ○ **PC** – confirmed that they will be included within the collision risk when the modelling is run and will be run for the breeding season separately to the wintering population. ▪ EoC requested that the CRM results for curlew are contextualised i.e., the population for the breeding season would be the one pair that is breeding on-site for the context of population mortality estimates. ○ **EoC** – outlined that it is important to ensure the appropriate population size is used for the assessment. The assessment will also need to characterise the effects and place them in context, including the breeding

Item	Description
	species present, the number of confirmed or probable pairs, and the overall breeding distribution within the site. ▪ Recommend review of specific literature on the effects of nest protection and how this can increase the population through fledgling success – this is well documented for curlew/breeding waders. ▪ Recommended that a basic calculation is carried out to measure the success of any enhancement measures (i.e., increasing juvenile success through nest protection, based on reliable sources that exist). It is a hypothetical but recommends carrying it out to ensure all proposals are appropriately characterised and mitigation is fully comprehensive to any potential significant effects. • Ex: if a particular turbine is causing a disproportionate impact, the NPWS would be looking for some sort of specific mitigation to ensure that the mitigation is comprehensive ▪ Outlined that the fledging time is the most vulnerable time for birds, gave an example of monitoring taking place during this time period and shutting down of turbines in the vicinity of nest sites to give the best opportunity for the bird species, if collision risk will be significant for any breeding species within the site. **Golden Plover** • **EoC** – on compensation for golden plover (GP), requested it is contextualised with the appropriate population levels and species behaviour during specific time frames are included o Recommended we don't go straight to a national level effect as the local or regional population is more likely to be effected. o **PC** – confirmed this will be completed for the above referenced species. MKO have carried out GP surveys up to 12km from the site to better contextualise the regional population. o **EoC** – flagged that requirement for future habitat considerations within the draft rehabilitation plans in terms of timelines, rate of succession, etc. o **PC** – flagged that the site is very large and there will be a lot of scrub within the site **Scrub/ Proposal Management and Delivery** • **EoC** – in regards to scrub management, queried the deliverability of these proposals and how it will be enforced over the long-term. Requested that the risk of deliverability is included within the assessment. o Ex. Dealing with scrub, costing this, and having reasonable theories of intervention (acknowledged that BnM may be different due to being the

Item	Description
	primary LO with a large team of ecologists) as on another site this was the main hinderance to successful delivery of the project ○ Queried if there is confidence in these measures? Any literature to reference or detail to bring in to outline the justification / theory of success for management proposals • **PC** – focused conversation on uncertainty and making sure that this is included in the EIAR ○ **EoC** – acknowledged the level of unknowns and outlined that the request is to bring this in as much as possible. ▪ Flagged the UK Habitat Categorisation Guidance which is a more effective manner to categorise vegetation which allows them to inform how trees or other species would colonise an area. There will be more of a problem with birch – could we review to see if there needs to be a risk detailed within the EIAR about the area not being fully able to recolonise the area (i.e., anticipate and quantify risk in EIA as much as possible) ○ Sufficient money and expertise required to ensure that measures proposed are feasible **CC** – acknowledged the importance of appropriately classifying management ▪ Clarified that Lodge Bog has been rewetted – and in the scenario where rewetting has occurred BnM have observed that Willow will persist, but Birch tends to die out ▪ BnM have this detail about succession and colonisation success of different species ▪ BnM have a site in the breeding wader EIP which is undergoing management for breeding waders – confident in knowledge BnM has to date but confirmed this feedback will be taken on board ▪ **EoC** – outlined that with BnM being the LO the NPWS has increased confidence in the ability to deliver successful management of enhancement proposals. Ensure that this detail is obvious within the documentation itself • **EoC** – recommended that not to be afraid of using the residual effect, if it can be contextualised in a temporal manner appropriately and it will eventually become not significant based on future trends, this would be a suitable approach by the NPWS (doesn't negate the overall effect of an associated proposal) • **PC** – confirmed there will be comprehensive monitoring for all measures • **EoC** – clarified that simple tends to be better with monitoring of enhancement measures such as this, can be backed up with robust survey data ○ Systems level feedback from measures is lacking in Ireland • **CC** – confirmed that if the draft rehabilitation plan needs indicators to be included, BnM and MKO can facilitate this ○ **EoC** – confirmed they would be looking for simple indicators (don't make too convoluted or complex) – more data points more frequently is the goal

Item	Description
	▪ Measures / indicators to inform intervention as required • **CC** – queried if NPWS would be open to technological surveys such as drone surveys? o **EoC** – confirmed the NPWS is a supporter of utilising drone surveys – often easier to measure indicators with the likes of a drone (better informs successful delivery in many cases) ▪ Recommended that any measures are back up appropriately with literature – where literature is not available, ensure transparency within the EIA about what is feasible with a justification and what may not be able to be proposed due to unknowns ▪ **PC** – confirmed approach • **EoC** – queried significant effect with Hen Harrier (HH), is it collision, loss of habitat? o **PC** – clarified that HH is using differing suitable areas within the site for roosting, not the standard roosting behaviour (i.e., no regularly used communal roosts identified but opportunistic single bird roosting throughout the site has been identified) ▪ Outlined that this detail will be clear in EIAR Ch 7, i.e., that there is no well established communal roost ▪ Clarified that EIAR CH 7 will identify compensation for potential habitat loss and not the loss of a specific roost site. • Outlined that there is a low probability of birds using the compensation area as they are opportunistic and roosting somewhere nearby and convenient. ▪ **EoC** raised the point that there will likely be a residual effect on local birds as you cannot guarantee use of the newly created roost habitat. o **EoC** – queried the confidence of the data to date? Requested that the exact locations are as accurate ("pinned down") as possible. Ensure mitigation hierarchy is detailed in the EIAR ▪ Queried if visibility was a leading concern? o **PC** – confirmed we have a good handle of HH data, they are just moving throughout the site (outlined that one winter it was likely 1 individual that was recorded) ▪ **EoC** – ensure this detail is clear with the EIAR as this is an element the NPWS will be looking into. Main legislation to ensure included is Article 44 (obligation of best effort) of the Birds Directive ▪ **CC** – gave general comment on categorisation of the point. In general there is likely a lot of opportunistic roosting with BnM

Item	Description
	landholding and it is not an uncommon experience to observe. BnM is aware of this across their land holding and their projects ▪ **EoC** – ensure opportunistic nature of the HH roosting is fully fleshed out within the report (ensure full transparency of residual effects)
7.	• **EoC** – outlined that in previous scoping response has mentioned the Long Derries SAC and queried if BnM owns this land o **JL** – clarified that some of the SAC is within BnM ownership boundaries d and separate to this application BnM have been conversing with the NPWS about enhancing this area but it isn't apart of the Ballydermot Wind Farm project. BnM met with NPWS onsite in May to discuss this. o **CC** – confirmed that if this is brought along ahead of the Proposed Project then we will ensure this is included cumulatively

An Roinn Iompair
Department of Transport

MKO
Tuam Road
Galway,
H91 VW84

8th January 2026

RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

The Department of Transport has the following comments in relation to the consultation request relating to the Scoping Report for the Proposed Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

It should be noted that the Department considers the construction involved in providing this development and especially, the connection cables to the national grid, may have effects on both the environment and the National, Regional and Local Road network.

Where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the public road network, it is necessary to consider the following:

- Their presence within the public road will likely significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works post construction.
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a "legacy road" (where there is no designed road structure and the subgrade may be poor or poorly drained) or bog rampart and the design needs to take account of all the variable ground conditions and not be based on a sample of

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the general soil conditions. This should include a constructability assessment to a 950mm minimum cover depth to the HV Cable on legacy roads, roads over peat/bog ramparts.

- The possible effect on the remaining available road space (noting that there may be need to accommodate other utilities within the road cross-section in the future or additional drainage for climate adaptation) on potential future development.

- The necessity to have the power in the cables switched off (particularly where structural failures occur due to extreme weather events) where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road and a complete operation and maintenance manual should be agreed with the Local Authority.

In this regard, please refer to Department of Transport Circular RW 07 of 2025 and the 'Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets)' which can be accessed at:

https://www.gov.ie/en/department-of-transport/publications/electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/

The 'Interim Guidelines' which, as outlined in the Circular, are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads by the 'HV Forum' and the conclusion of any outcomes from the Private Wires Consultation undertaken by the Department of Energy, Climate and Communications.

Notwithstanding, in relation to proposed works utilising the public road network, as part of the grid connection routing, it is the Departments opinion that the proposed routing must be undertaken in a manner to avoid the potential to impact on future maintenance, improvement and operation of the road network in this area.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; 'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'. Having regard to the measures identified in CAP24 and the information in relation to grid routing included in the subject application, the Department recommends that there is a requirement that the Board establish that the routing proposed represents the 'optimal solution'.

The Department consider it important that the examination of the proposal should include consideration of the following:

- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options (or combinations of both) and route options other than the routing of cables along the public road to ensure the best performing route and technology option is selected, (ensuring compliance with CAP24). The public road should only be considered following a robust MCA determining the optimal solution including examining the most linear solutions,
- Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads,

In terms of detailed design of any cable routing impacting the public road network, without prejudice and in accordance with Department of Transport 'Interim Guidelines', the Department would recommend the following conditions should be applied to any grant of permission that includes the laying of high voltage electricity cable in the road network where that routing is identified as the 'optimal solution';

1. Prior to commencement of development, engagement with the planning authority should discuss and agree the route for the HV Cable(s) to identify/agree the routing 'optimal

solution' along with the associated requirements for traffic management, road opening licencing, times of work, reinstatement, positioning of chambers/ joint bays etc.

2. A condition requiring the developer to, at a minimum, comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.

3. Electricity cabling shall be laid off carriageway where feasible.

4. Wherever possible, joint bay structures are best located off the carriageway in verges, open spaces, or adjacent sites; and where they must be under carriageway, joint bay structures will be to accepted design standards.

5. High/medium voltage transmission underground cables should not be sited on or attached to existing roads structures, masonry bridges/ culverts and the like.

6. A condition requiring that the location of the cables would be recorded as exactly as possible, using BIM type technology, so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the Roads authority. This record should include as constructed surveys of all infrastructure altered, added, removed or relocated and exact detail of the road construction including any drains or other features encountered. The record should be lodged with the local authority and with the ESB Networks for retention on their records.

7. A condition requiring the replacement of culverts that have been excavated during the cable duct placement operation. The replacement culverts should be designed appropriately and include an allowance for the effects of climate change.

8. A condition requiring the developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables. In addition, the condition should require Owner and Power Controller to notify the Roads Authority of any change in ownership of the cables or change of Power Controller transmitting power along the cables. In all instances the Owner and Power Controller should be required to maintain an agreed contacts list with the Roads Authority.

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Aisling Thompson

From: Lagan, Fay (EXT) <Fay.Lagan@Eirgrid.com>
Sent: Thursday 4 December 2025 15:39
To: Aisling Thompson; STATUTORY NOTIFICATIONS
Cc: Ellen Costello; Catherine Johnson; Ciarán Fitzgerald
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

You don't often get email from fay.lagan@eirgrid.com. Learn why this is important

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Aisling,
Thanks for the email. As you may be aware EirGrid has agreed an Engagement Protocol for UGC cables in public roads. While the Protocol is intended for EirGrid projects only, the Roads Sector may or may not refer to it in their consultation with you. A link is provided below for information only. This Protocol will remain in place for now but it could be superseded by something else coming out of yesterday's Accelerated Infrastructure report (Action 21). We have no information on that.

https://cms.eirgrid.ie/sites/default/files/publications/Electricity-Transmission-Infrastructure-Development-Roads-Sector-Engagement-Framework.pdf

It is unlikely we will have any further comment but I will check with my colleagues.

Best Regards,
Fay.

Fay Lagan | Planning and Environment Unit
EirGrid

M: + 353 (0)86 169 3949

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:18
To: STATUTORY NOTIFICATIONS <StatutoryNotifications@Eirgrid.com>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

---

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with Eirgrid in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
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From: Karen Mulryan
Sent: Tuesday 2 February 2021 10:54
To: 'StatutoryNotifications@Eirgrid.com' <StatutoryNotifications@Eirgrid.com>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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Séanadh:

Tá faisnéis (agus/nó ceangaltáin) a d'fhéadfadh a bheith faoi phribhléid nó faoi rún sa teachtaireacht leictreonach seo. Tá an t-ábhar uile beartaithe a bheith d'úsáid an duine aonair nó an aonáin chuig a ndírítear é amháin. Sa chás nach tú an faighteoir beartaithe, bíodh fios agat go bhfuil cosc ar aon nochtadh, cóipeáil, dáileadh nó úsáid d'ábhair na teachtaireachta seo. Is iad tuairimí nó barúlacha an údair amháin na tuairimí nó na barúlacha a léirítear sa teachtaireacht seo, agus b'fhéidir nach ionann iad agus tuairimí nó barúlacha EirGrid. Má shíleann tú go bhfuair tú an ríomhphost seo trí earráid, cuir é seo in iúl don seoltóir láithreach le do thoil. Cé go scanann EirGrid ríomhphoist agus ceangaltáin, ní thugann siad ráthaíocht go mbíonn ceachtar acu saor ó víreas ná ní ghlacann siad aon dliteanas as aon damáiste a dhéantar de thoradh víreas.
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Electricity Transmission Infrastructure Development

Roads Sector Engagement Framework

February 2025

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Revision History						
Revision	Date	Description	Originator	Reviewer	Checker	Approver
Final	11/02/25	Final	FL	RD	SD	LO'F

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Definitions

Steps	The stages of an EirGrid project, as part of EirGrid's Framework for Grid Development.
Interactions	An engagement opportunity proposed between Electricity Sector (EirGrid/ESBN) and Roads Sector (TII/LAs/RMO). This can mean emails, a meeting, or a series of meetings.
Electricity Sector	Electricity Sector refers to ESBN and EirGrid collectively, in this document. See Section 1 for responsibilities.
Road Stakeholders / Roads Sector	Road Stakeholders or Roads Sector refer to TII, Local Authorities, RMO and DoT collectively, in this document. See Section 1 for responsibilities.
Emerging Best Performing Option	If a dominant option exists, it can be identified as an Emerging Best Performing Option until further consultation and analysis is completed and adequate confidence on the option is achieved.
Emerging Best Performing Technology Option	Defined at Step 3 and usually refers to the option of overhead line or underground cable as a technology option for the proposed project.
Emerging Best Performing Route Option	Defined at Step 4a and refers to a developing route option which is preferred by EirGrid but is still subject to further design, survey, consultation, and assessment.
Best Performing Option	Following analysis and consultation, and in some cases further refinement, the Emerging Best Performing Option (can be technology or route option) is confirmed as the Best Performing Option. This is the option that will be taken forward.
Multi Criteria Assessment (MCA)	EirGrid process to facilitate a balanced consideration of the technical, economic, environmental, social and deliverability aspects of a development project.
Agreement in Principle	Following a collaborative process pre-planning submission, it would be expected that TII / Local Authorities would provide a 'Statement of Agreement in Principle' to the Planning Application, which may be accompanied by a schedule of comments and is provided without prejudice to the resolution of points of detail particularly arising from the Road Opening License process as the design develops and in line with the Planning Decision.
Preliminary Design	This is the level of design detail that is included in the planning submission. The Preliminary Design will show sufficient detail of the project to identify significant issues and impacts, identify key mitigation measures and establish feasibility of construction. This level of design is the responsibility of EirGrid but will include inputs and review from ESBN.

Detailed Design	The detailed design is the responsibility of ESBN and is undertaken post-planning and pre-construction. It is a greater level of design detail and allows for input from the Contractor should it be required. EirGrid will provide input to ensure consistency with the Preliminary Design.
Transmission Network Projects	The electricity supply network is made up of the Transmission Network and Distribution Network. The Transmission Network covers 400 kV, 275 kV, 220 kV and the majority of 110 kV lines and is operated by EirGrid. The Distribution Network covers 110 kV in the Dublin area, 110 kV tail-fed stations and nationwide 38 kV, 20 kV, 10 kV and low voltage and is operated by ESBN. Transmission Network Projects are 110 kV and above projects planned and operated by EirGrid.
Project Communication Plan	This will be a record of all stakeholder engagement on the project. It will be maintained by EirGrid from Steps 1 – 5 and handed to ESBN to maintain at Step 6. The plan will be a record of interactions, key issues, and points of agreement.
Standing Committee	A senior 'Standing Committee' arrangement whereby the two sectors could review upcoming projects and the potential for synergies or collaboration with other national infrastructure developments. It could also serve to 'troubleshoot' difficulties arising from experience on projects. The two sectors will review existing structures and their 'Terms of Reference' and agree the best mechanism for this strategic level engagement involving senior personnel, for example the existing tri-partite 'TII ESB EirGrid Protocol (October 2020)'.
Public Road	A road over which a public right of way exists and the responsibility for the maintenance of which lies on a road authority.
Road	This includes any bridge, pipe, arch, gully, footway, pavement, fence, railing or wall forming part thereof.
Roadway	That portion of a road which is provided primarily for the use of vehicles.

1. Introduction and Context

1.1. Background to Grid Development

The Climate Action Plan (2023 and 2024 versions) sets out a roadmap for delivery of Climate Targets for key sectors across Ireland. The energy and transportation sectors have agreed to challenging targets and both sectors are committed to working collaboratively to deliver on these for the electricity network, requiring new approaches to projects, their coordination and stakeholder consultation.

The electricity sector plays an important role in the decarbonisation of other sectors through electrification, including transport, heating, and industry. The Climate Action Plan commits the electricity sector to delivering on our climate commitments by 2030 and acknowledges the role that road infrastructure will play in delivering on these commitments, where this is the "optimal solution" (Climate Action Plan 2024).

EirGrid has published "Shaping our Electricity Future"[1] which sets out a pathway to delivering on the 2030 Climate ambition. A fundamental element of this is supporting electricity infrastructure delivery (transmission network). In that regard, EirGrid and ESB Networks play significant roles. The electricity networks plan as part of 'Shaping our Electricity Future (SOEF)' sets out the network upgrades and new networks required to support the deployment of renewable energy across our island. A portfolio of projects is being advanced to support the Climate Action plan delivery, some of which will be underground cables.

Should the best performing technology option for a new grid development project be confirmed as a new circuit, EirGrid is committed to taking forward an overhead line and an underground cable option (assuming technical viability) for appraisal. From the start of this process, EirGrid will engage with the Roads Sector as set out in this Engagement Framework to ensure that potential impacts of high voltage transmission underground cable circuits on public roads and associated stakeholders' issues are identified, considered in project optioneering and mitigated where an in-roads option is chosen. Where a road may also be a planned corridor for future public transport services or utility infrastructure, these may have additional specific requirements to consider and address through consultation.

The Roads Sector has highlighted concerns around the impacts of high voltage transmission underground cable circuits installed in public roads in terms of road asset integrity, performance and roads operations, traffic safety and disruption as well as associated costs and liabilities.

Regional and local roads are recognised as offering potential for high voltage transmission underground cable circuits, where shown to be feasible, provided arrangements for traffic accommodation (including temporary diversion arrangements) are suitable, the characteristics of road structures, ground conditions, drainage systems and other services are addressed, and the road reinstatement provisions are appropriate.

Where high voltage transmission underground cable circuits are routed within the high speed / high traffic volume network (including the Motorway and National Road network) there can be particular additional economic, social and roads safety risks.

Each route requires site specific consideration, taking account of the road environment, geotechnical, characteristics, traffic, land ownership and local conditions. Road structures (e.g. bridges, culverts) have particular issues with implications for high voltage underground cable routing.

These factors emphasise the importance of full engagement with the Roads Sector throughout all project development stages.

[1] https://www.eirgrid.ie/shaping-our-electricity-future

1.2. HV Interface Forum

To support development of high voltage electricity networks, a 'HV Interface Forum' ('the HV Forum') was initiated between Key Partners within the Electricity and Roads Sectors to bring together stakeholders in open dialogue to establish the ways of working that will deliver on the Climate Action Plan ('CAP 24') . This recognises the unique challenges presented by the accommodation of Transmission Network Projects in public roads, where this is nevertheless the optimal solution.

The Forum developed a high level 'Cooperation Agreement' in August 2023 which was agreed by all parties engaged in the Forum and set out the following Key Principles:

1. All parties acknowledge that underground routing along public roads infrastructure, where practical, is a key enabler of the EirGrid's "Shaping Our Electricity Future".
2. All stakeholders are committed to working constructively towards accommodating the electricity transmission infrastructure, provided that significant roads impacts are objectively identified and addressed.
3. Early engagement has been identified as a key requirement whereby roads issues and impacts are identified and addressed from the outset of each project.
4. EirGrid will fully assess route options, including alternatives to public road where appropriate, in order to optimise the schemes. Under the Forum, a joint working framework will define protocols for engagement between electricity and Roads Sectors through the project lifecycle.
5. Protocols will be developed in line with best practise so that electrical and road infrastructure can be effectively operated, maintained and repaired to deliver the separate mandates of electricity and Roads Authorities.
6. The Forum acknowledges the need for cost of participation by Roads Authorities in project delivery to be covered in project budgets.
7. Electricity transmission infrastructure systems in public roads creates the potential for future cost liabilities.
8. The Forum will seek to address protocols for addressing liabilities arising from operation of transmission Infrastructure in public roads.

This document will provide a roadmap for future Transmission Network Projects that will interact with public roads, providing for the necessary consultation and agreement between EirGrid, ESBN, and Road Stakeholders, without affecting their respective statutory rights and obligations.

The key stakeholders in the delivery of Transmission Network Projects in roads are:

- **EirGrid** – Transmission System Operator (TSO); operates and plans the development of the electrical grid.
- **ESBN** – As the licensed onshore Transmission Asset Owner (TAO) in Ireland, ESBN is responsible for managing and delivering the detailed design, construction and maintenance of the transmission network. ESBN and EirGrid work together to deliver Transmission Network Projects.
- **TII -** Statutory body with responsibility for the planning, supervision of works for the construction and maintenance of national roads and operation of light rail networks.
- **Local Authorities** - road authorities for all roads, national and non-national, within their functional areas with responsibilities including management, construction maintenance and licensing.
- **Road Management Office (RMO)**- shared service providing support across Local Authorities in roads asset management and licensing of road openings.

- **Department of Transport (DOT) Regional and Local roads** – the Government Department responsible for transportation policy, disbursement of the financial resources provided by the taxpayer for investment in our transport system including public transport. Active travel, rail and road networks and safe conduct of transport on land.
- **Department of the Environment, Climate and Communications (DECC)** - the Government Department responsible for the development a competitive energy supply industry, to ensure security and reliability of energy supply, and to develop energy conservation and end-use efficiency.
- **Commission for Regulation of Utilities (CRU)** - EirGrid is the body licensed by the CRU to act as TSO, and to offers terms and levies charged to market participants to connect to and use the transmission system regulated by the CRU. ESBN is licensed by the CRU as the Transmission Asset Owner (TAO) and is responsible for carrying out the maintenance and construction of the system.

1.3. Engagement Document Context

This Engagement Framework will be operated to deliver the following outcomes:

- A clear engagement protocol with all parties understanding the routing principles and criteria applicable to project selection, expected level of information required for objective decisions at each interaction and the basis of decision making process at each stage.
- A consistent engagement process from commencement across all Transmission Network Projects, that have the potential to impact public roads.
- An agreed protocol for effectively addressing relevant issues affecting road infrastructure and utilities adopting appropriate avoidance or mitigation measures and agreed standard details.
- Transparency on both the Multi-Criteria Assessment (MCA) and any infrastructure routing decisions arising from its application.
- Reduced delay in consultation between all parties and therefore costs, while delivering more robust projects capable of implementation within Planning Permission constraints, including the required terms for granting Road Opening Licenses and managing road safety. In Steps 1-5, this will be led by EirGrid and in Step 6 this will be led by ESBN.
- Providing for collaborative management of the Construction and Operational phases in-line with agreed protocols referenced herein.

The HV Forum has a number of Working Groups and this engagement document defines an overarching approach which should be read alongside outputs from Working Group 4 (Liabilities & Costs) and Working Group 5 (Enduring Standards & Technical Protocols).

The engagement framework in this document addresses the need for effective interaction with the relevant stakeholders/organisations through the stages of Transmission Network Projects. It acknowledges that the impacts and risks in public roads will be effectively captured, understood and addressed as an integral part of the project development process. There are a range of constraints that will need to be examined, including inter alia, structures including arch bridges, existing and planned utilities/services, available verge widths, drainage conditions and requirements and local ground conditions, notably bog ramparts. The process will also address traffic management and diversion options and their socio-economic impacts, haulage routes, and other construction conditions.

This document recognises the handover of grid projects from EirGrid to ESBN post Statutory Consents, when projects should exhibit sufficient certainty of deliverability supported by satisfactory consents / approvals (where they apply). Where projects involve roads interfaces, the objective is to have sufficient design and project development underpinning submissions for statutory consents to give a high level of assurance on the choice of project, its boundaries and constraints. ESBN will then develop the design specification and tender documents, incorporating the consent conditions (if they exist) and arrangements agreed with Roads Authorities, leading to appointment of a contractor (Design and Build contract). The detailed design, construction programme and communications plan will be progressed by the Contractor under ESBN

supervision leading to final agreement on Road Opening License (ROL) terms consistent with previous interactions.

EirGrid and ESBN as electricity undertakers have statutory rights for exempted development. In cases where grid development is proposed but is defined as exempted development, EirGrid will follow its Grid Development Framework to Step 5 to conclude in a Determination of Declaration of Planning Exemption. In such cases, where high voltage transmission underground cable circuits may impact public roads, the full provisions of this Engagement Document will otherwise apply to ensure final agreement on Road Opening License (ROL) terms.

The focus of this Engagement Document is Transmission Network Projects where there is an option that would impact public roads (e.g. underground cable). EirGrid has publicly committed to considering underground cable as an option until Step 4[2]. This Engagement Document and its interactions are to be followed until underground cables affecting public roads are ruled out as an option for any Transmission Network Project.

1.4. Engagement Protocol - Steps

EirGrid operates a Framework for Grid Development which provides a stepped approach to Transmission Network Projects. Progression is divided into six distinct steps, focussed on building the case for the project, identifying the best performing option, gathering information and delivering the assessments required to inform the consenting, licensing and decisions necessary to deliver the project.

The steps of the EirGrid's Framework for Grid Development and the decisions made at each step have been used as the basis of defining engagement with Road Stakeholders. Key to this Engagement Framework will be the appropriate discussions or interactions at key points in Transmission Network Projects where the EirGrid Project Team will engage in detail with the relevant Roads Stakeholders on the consideration of options leading to decisions at each step.

In this document, we reference 'Strategic Interactions' being high level programme wide engagements and 'Project Interactions' relating to the detail of an individual project once a cable solution has been selected.

The proposal for Strategic Interaction would be enabled by a senior 'Standing Committee' arrangement whereby the two sectors could review upcoming projects and the potential for synergies or collaboration with other infrastructure developments. It could also serve to 'troubleshoot' difficulties arising from experience on projects. The two sectors will review existing structures and their 'Terms of Reference' and agree the best mechanism for this strategic level engagement involving senior personnel, for example, the existing tri-partite ESBN/EirGrid/TII protocol.

Project Interactions would apply at project level, involving the EirGrid / ESBN project team and relevant Roads Stakeholders representatives, meeting regularly through the framework set out in this document, ensuring that roads interests are fully understood and addressed as far as practicable in arriving at the optimum high voltage scheme.

A roadmap is shown in Figure 1 and demonstrates the number of interactions which will, typically, be held on a Transmission Network Project, shown as a chevron shape: 

There will be a series of interactions before and after each key milestone, which are shown as a box and arrow: 

This process will enable EirGrid to develop robust Transmission Network Projects that are capable of being delivered with the required level of certainty for Construction Contractors, provide for long term operation of both roads and electricity assets, while ensuring safety of workers and road users. Figures 1 and 2 show the EirGrid project development process and the outline arrangements for engagement with Roads Sector.

[2] The EirGrid document "Ireland's Grid Development Strategy" states that "*We have always considered underground technology during initial project research and technical analysis. We are committed to engaging with the public before we identify a preferred technology. This consultation will explain the transmission technology option, and then seek feedback from stakeholders. This will help us to determine the best transmission technology for future projects. We are committed to looking for alternative options that may avoid or reduce the need for new overhead lines.*" (Statement No. 2 Page 29 - EirGrid-Draft-Grid-Development-Strategy.pdf).

Figure 1: Roadmap of HV Forum Engagement for Transmission Network Projects

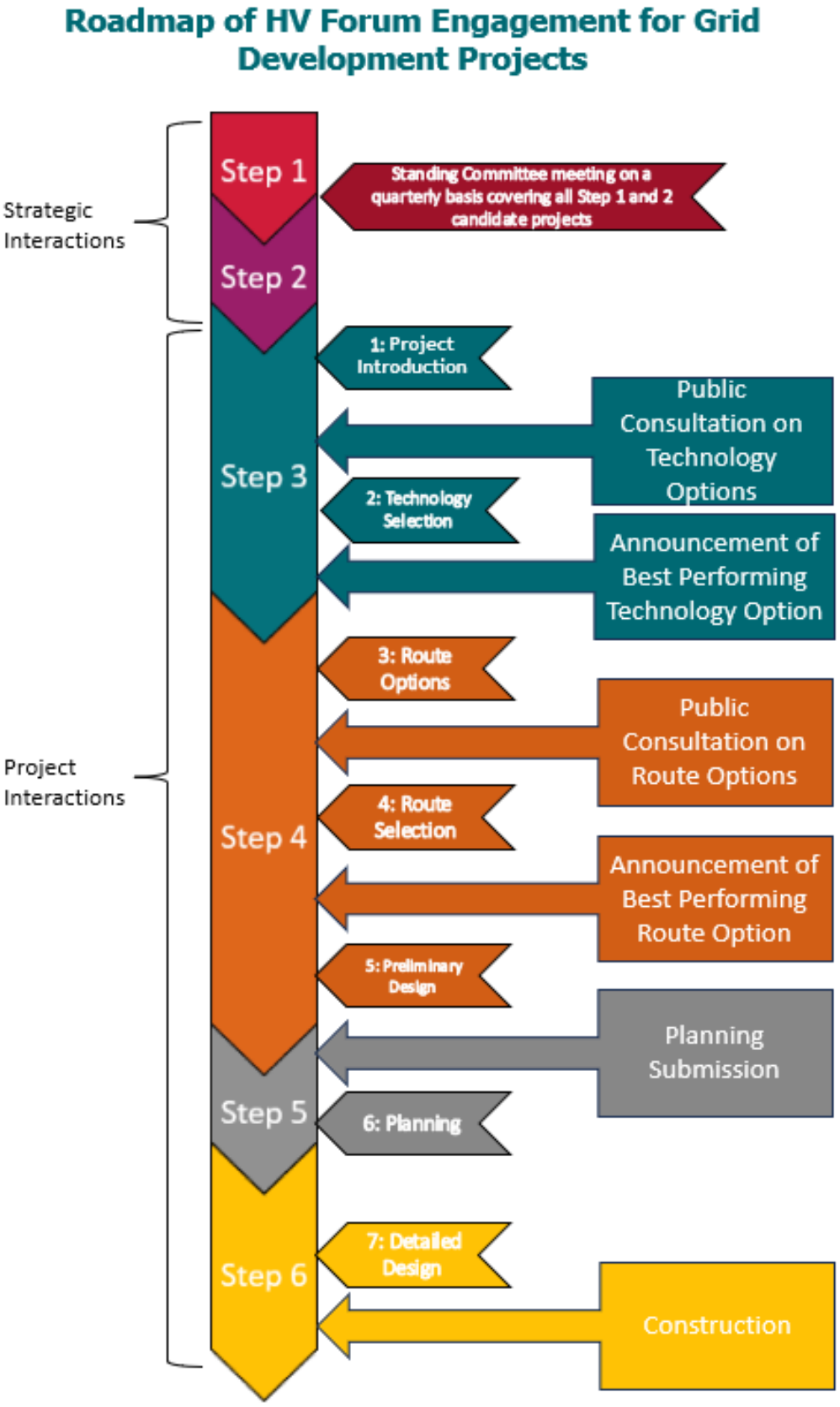
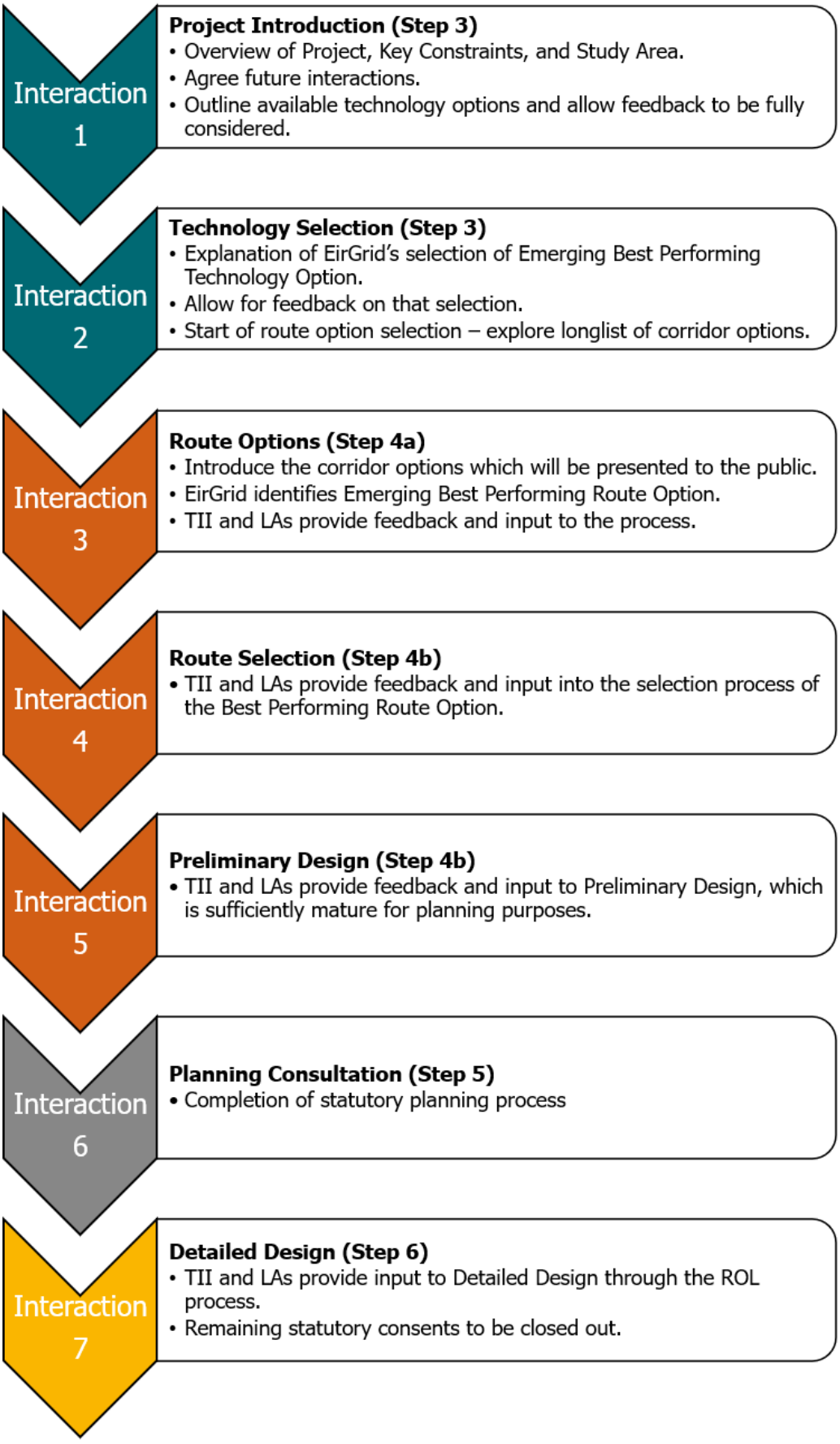


Figure 2: Summary of Project Interactions



2. Steps of HV Transmission Development

2.1. Process Overview

EirGrid's Framework for Grid Development process provides for a stepped approach to the management and delivery of proposed Transmission Network Projects. Progression is divided into six distinct steps, focused on building the case for the project, identifying the best performing route, gathering information and delivering the assessments required to inform the consenting and licencing decisions necessary to build the project. Table 1 outlines the key steps of the current Framework for Grid Development and Table 2 provides further detail on the outcomes of each step.

Table 1: Steps of the EirGrid's Framework for Grid Development.

Step 1	How do we identify the future needs of the electricity grid?
Step 2	What technologies can meet these needs?
Step 3	What's the best option and what area may be affected?
Step 4	Where exactly should we build?
Step 5	The Planning Process
Step 6	Construction, Energisation and benefit sharing

These project development steps are well recognised in infrastructure planning allowing for a gradual approach with stakeholder and public consultation at key points throughout the projects. As a project evolves through the steps, the process involves a narrowing of options with an increased level of design detail, understanding of conditions and constraints to be managed. The project begins with a concept solution leading to mapping of constraints. Evaluation of these constraints leads to initial corridor options for linear projects, the gradual emergence of a shortlist of corridors and ultimately determination of a preferred solution. During the latter steps, the level of project definition increases along with the availability of data likely to influence the design. Collection of this data is enabled by effective engagement supplemented by detailed site surveys (topographic, geotechnical, special structures and conflicting services). In all of these stages, effective engagement with Roads Authorities is recognised as essential where roads interfaces arise.

A comprehensive and consistent approach to decision making is used throughout the various steps in the EirGrid's Grid Development Framework. The approach, using MCA, facilitates a balanced consideration of the technical, economic, environmental, social, and deliverability aspects of a grid development project. These five criteria used in the performance matrix align with EirGrid's statutory obligations. The criteria are fleshed out for each project with relevant sub-criteria that reflect the issues and impacts.

The MCA approach also accords with the requirements of the Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU as transposed into national legislation. There is a requirement for all projects requiring an EIA to have assessed all "reasonable alternatives". Not all Transmission Network Projects will require an Environmental Impact Assessment, however the MCA approach

allows EirGrid to ensure that all reasonable alternatives are considered from the early steps on each project, leading to a robust project regardless of the requirement for EIA.

The MCA criteria and typical sub-criteria are shown in Figure 3, and an example of its application is shown in Figure 4 below. The MCA criteria are applied during two distinct steps of the project. Initially in Step 3, the MCA process is applied to select the best performing technology and feasible corridors to suit the requirements of the project. Subsequently the MCA criteria are applied during Step 4 to choose the best performing route for the technology chosen in Step 3.

By integrating the understanding of the Roads Sector issues and conditions, the MCA criteria will objectively reflect the optimum choices taken forward at each step. There are a large number of interfaces between roads and the Transmission Network Projects affecting pavement, verge conditions and existing services, drainage provision & maintenance, planned improvements or services. All interfaces will be explored on a case by case basis and addressed accordingly within the MCA.

Figure 3: EirGrid MCA Criteria and Typical Sub-Criteria



Figure 4: EirGrid Typical Matrix Format

Assessment Criteria	Option 1	Option 2	Option 3
Economic			
Technical			
Environment			
Socio-Economic			
Deliverability			

This table is indicative only and is not based on an actual project.



2.2. Key Routing Principles for High Voltage Transmission Underground Cable Projects

EirGrid follows certain key routing principles that inform the best performing options for high voltage transmission underground cable projects. These routing principles, chosen to give a high level of confidence of deliverability, are consistent with the objective to identify the 'optimal solution' as identified in CAP 24, determined through the MCA process with reference to the data captured through stakeholder engagement and project surveys. The routing principles are:

- Routes will generally follow linear corridors (whether within existing infrastructure corridors or proximate to them) in order to achieve programme deliverability, safe and effective accessibility for the construction operations and for future maintenance by the asset owner and operational contingency.
- Routes will be selected:
    - to give a high level of assurance as regard meeting the technical requirements and approved standards adopted by the Electricity Sector for high voltage infrastructure. These conditions are enabled by following linear sites that can offer sound surfaces for construction operations, predictable ground conditions, connectivity to haulage routes and construction depots.
    - to minimise the risk, impact, or effect on environmental or heritage sites or where the works would be at risk of conflict with other regulatory obligations or public / community interests likely to result in unpredictable delays and / or costs.
- Routes will be assessed:
    - For technical performance including implications for future performance of road pavement, road structures and taking account of resilience of the assets (road and electric) for the effects of climate change.
    - for performance on socio-economic criteria including commercial and community impacts, disruption to local activities, traffic impacts and public safety, agricultural enterprises, impacts on other utilities and local services.

- For overall economic performance including implementation and life-cycle costs, realisation of benefits within target timelines, meeting Climate Plan objectives, economic impacts on roads or other linear corridors, other stakeholders and enabling energy security.

In considering how to deliver the scale of HV infrastructure required to meet climate targets in the timelines adopted by Government, road corridors have thus been identified as a key enabler of the programme, where practical. The optimum route will be based on giving EirGrid maximum certainty of timely delivery, without compromising road assets, their safe operation and maintenance, where applicable. The optimum route may be achieved within the roads limits (verges, carriageways where possible) or off-line from the road or an optimum combination of both.

Where impacting private lands, EirGrid always endeavours to procure wayleaves by consent, with consideration of compulsory acquisition where that option is necessary given all relevant factors.

Development of an agreed Code of Practice (Working Group 5) would provide further detailed technical guidelines for use in project development where roads interfaces arise.

2.3. Key Roads Sector Constraints for High Voltage Transmission Underground Cable Projects

The following key constraints inform the best performing options for high voltage transmission underground cable projects, where they impact public roads:

- Wherever possible, joint bay structures are best located off the carriageway in verges, open spaces, or adjacent sites; and where they must be under carriageway, joint bay structures will be to relevant electrical standards and in compliance with published roads standards, , at least single lane traffic should be maintained including provision of temporary passing bays as required.
- Save for exceptional circumstances, high voltage transmission underground cables should not be sited on or attached to existing roads structures, masonry bridges/ culverts and the like. Such structures require more complex maintenance intervention and upgrading that would be compromised by the proximate presence of live high voltage systems.
- The majority of roads in Ireland have ‘legacy’ pavement and drainage arrangements that evolved over decades and require intrusive interventions in response to emergency failures (e.g. slips, flood damage), increased capacity needs or in response to climate effects or changes in loading. These impacts can be partly mitigated by a high standard of pavement reinstatement, strategic upgrade of vulnerable structures or utilities, or other agreed appropriate reinstatement standards.
- Public roads can have irregular geometric characteristics which result in construction challenges of maintaining safe traffic movement, meeting essential community needs or where available road-space is occupied by existing services or designated for planned future utilities.
- The presence of high voltage transmission underground cables will likely involve additional technical challenges and costs in respect of future road maintenance and major upgrade works. These impacts will be further addressed in the Transmission Infrastructure Development – HV Forum WG4 protocol (Costs & Liabilities). .

The following sections outline the sequence of steps, related engagements and processes that will be followed by EirGrid / ESBN working with the Roads Sector, to deliver sustainable and resilient high voltage transmission underground cable circuit projects having regard to the above criteria and considerations.

Table 2: Outcome and Deliverables of each Step, from EirGrid's Framework Approach to Project Delivery

Step	Outcome	Deliverable
Step 1	The output of Step 1 is that a confirmed need for an identified transmission network issues with suggested candidate solutions to quantify the 'project scale'.	• EirGrid Energy Scenarios • Tomorrow's Energy Scenarios Needs Assessment (TESNA) • Needs Ranking Report
Step 2	The key output of Step 2 is a shortlist of technical solutions that meet the power need of the grid. Note, these solutions are at schematic level only. Route options of feasible technical solutions to be appraised at step 3.	• Short list of technology options • Technology options selection/justification report
Step 3	The key output of Step 3 is the identification of a best performing technology solution and corresponding corridor study area to meet the need for the development of a project. At this stage, route corridor(s) are identified from high level options against mapped constraints (topography, environmental, heritage, land use, etc)	• MCA on the technology options • Best performing technology option report (Technology selection report including corridor study area)
Step 4 (a & b)	The key output of Step 4 (in a number of stages) will be a specific project, the nature, location and extent of which is clearly defined and mapped. A critical deliverable in this step is engagement with affected or potentially affected landowners and communities, and a documented capture of feedback arising from engagement. A report documenting the work undertaken in this step will be collated, published and consulted on. Any feedback from such a consultation will be analysed, collated, published and will inform the decision made at the gateway	• MCA on the route options • First the route options need to be presented, data collected, issues considered etc. • Emerging best performing route identified from shortlist and subjected to detailed consultation before refinement and final selection using informed MCA reflecting the project characteristics • Best performing route option report (Route selection report)

Step 5	The key output of this step is a decision from the consenting authority. Assuming a statutory application for consent is required, the key activities involve the preparation and signoff of the various application plans and particulars.	• Determination of Declaration of Planning Exemption, or
		• Statutory planning application (if required), including:
		  ○ Planning report
		  ○ Environmental Impact Assessment Report (EIAR)
		  ○ Planning application drawings
		  ○ All other documentation required for planning application.

Step 6	The key output is the completed and energised project, as well as all associated documentation, including as built records and other information. This step is the responsibility of ESB Networks.	• Engagement with ESB Networks for Construction stage activities. • Detailed Design (by ESB Networks) • All other licences: ROL, Foreshore, Tree Felling, Crossing, etc

3. EirGrid / ESBN / LA / TII Interactions

3.1. Strategic Interactions (Step 1 – 2)

Based on its Framework for Grid Development, EirGrid establishes individual projects at Step 3. Steps 1 and Step 2 are technical steps which establish challenges that the grid faces, the need for interventions, whether a project is required to address the challenge, and what form that project might take. Because of their high level technical nature and the absence of a specific project, meaningful Project Interactions are unlikely to arise at Step 1 and Step 2.

Emerging Projects in these early development stages are appropriate for discussion as Strategic Interactions (Standing Committee). These discussions would ensure all parties are informed of potential emerging projects and have the opportunity to identify synergies where possible. Synergies could include upcoming projects where shared corridors could be established from the outset; identifying new technologies and testing opportunities; high-level problem solving, etc. These meetings would also assist in troubleshooting, to help solve cross-sectoral issues as they arise.

The two sectors will review existing structures and their 'Terms of Reference' and agree the best mechanism for this strategic level engagement involving senior personnel, for example, the existing tri-partite ESBN/EirGrid/TII protocol.

3.2. Project Interactions (Steps 3 – 6)

At a project level, it is proposed to have a series of interactions at each step of the Transmission Network Project beginning at Step 3. The term 'interaction' has been used to be inclusive of all engagement at a Step ranging from emails, a meeting, or a series of meetings and workshops. The approach and timing of the interactions will be agreed and made appropriate to the nature of the Transmission Network Project, its location, the potential issues, and the wishes of all parties on how to approach the interactions.

Appendix 1 of this document provides a suggested framework for the interactions, outlining how meetings will be arranged, chaired, minuted and how and when data will be exchanged. The approach is indicative and will be agreed at Interaction 1 (Project Introduction) and can be modified as the Transmission Network Project develops, subject to agreement.

Through Interactions 1 to 5, which occur during steps 3 to 4, a Multi Criteria Analysis (MCA) process will be developed by EirGrid for the specific project, with data compiled under the 'Criteria' based on the project characteristics. Where Transmission Network Projects interface with public roads, this process will capture relevant data on the related socio-economic, technical and environmental impacts for inclusion in the analysis. The Multi Criteria Analysis will be updated and used at appropriate times in the process, designed to identify the optimum project selection based on the information available. The input of the Roads Sector will be incorporated into this analysis.

At Interaction 5 (prior to lodgement of a planning application), the objective is to review the output of the process up to 'Preferred Scheme' and to facilitate confirmation of 'Agreement in Principle' as defined (see Definitions) from TII and the LAs prior to planning submission. At this point in the project, the requirement is for a well-defined project with sufficient design detail and underpinning data to provide confidence that the process will result in an approved project that is capable of being implemented.

This Statement of 'Agreement in Principle' would:

a) not preclude any formal submission, including suggested planning conditions, where appropriate, being made to the competent authority by TII and LA in respect of the planning application.

b) Recognise that key concerns raised by TII and Local Authorities have been addressed with an acceptance that there may be further detailed resolution required through planning conditions or at the Detailed Design / Road Opening Licence finalisation stage (Step 6).

This confirmation of “Agreement in Principle” is proposed between EirGrid, TII and Local Authorities prior to publication of the statutory consent application for the Transmission Network Project. This will reflect the work done, the joint participation in the project development and a shared understanding of how the project will be delivered. It does not preclude the later resolution of matters of design and construction detail to be addressed and agreed as part of the Road Opening Licence process, when the final design detail, construction programme and other key detail is available.

The “Agreement in Principle” is not a statutory document and would not affect any parties’ statutory rights or obligations. It is an objective or aim for the project team and is meant to indicate that all parties have worked together to identify the optimal solution for the project, as far as is possible.

Table 3 provides a summary of the key outputs from each of the six steps in EirGrid’s Framework and highlights the interactions that will take place at each step. The following sections of this chapter (Section 3.3 – 3.9) provide further detail of the nature of each interaction. It is acknowledged that the number of interactions and their nature will vary depending on the location, nature, and complexity of the proposed project.

The first interaction (Interaction 1 – Project Introduction, undertaken early in Step 3) will provide an opportunity for the format and number of interactions to be discussed and agreed by all parties. Depending on the Best Performing Route Option, Interactions 5-7 may not be required, for example if an overhead line is chosen.

This Engagement Document is a best practice methodology and does not affect any parties’ statutory rights or obligations.

Table 3: Summary of EirGrid's Framework and Interactions

EirGrid Project Step	Interaction	Interaction Outcome
Step 1 How do we identify the future needs of electricity grid?	Strategic interactions	At this Step, there is no specific project and any interactions will be strategic in nature. Quarterly strategic interactions will be undertaken to ensure all parties are kept fully informed of upcoming projects and to look for possible synergies.
Step 2 What technologies can meet these needs?	Strategic interactions	At this Step, there is no specific project and any interactions will be strategic in nature. Quarterly strategic interactions will be undertaken to ensure all parties are kept fully informed of upcoming projects and to look for possible synergies.
Step 3 What's the best option and what area may be affected?	**Interaction 1**	**Project Introduction** Will occur before any public announcement/consultation event on technology options. It is to introduce the programme; discuss the technology options available, proposed study area and key constraints; allow feedback on the options to be fully considered; and agree the nature of subsequent interactions.
	Interaction 2	**Technology Selection** It is to explain EirGrid selection of Emerging Best Performing Technology Option, allow for feedback on that selection prior to public announcement/consultation event on the technology options and to start input to route option selection and explore longlist of potential route options (corridors at this stage).
Step 4a Where exactly should we build?	**Interaction 3**	**Route Options** Will occur before any public announcement/consultation event on route options (corridors). It is to discuss the shortlist of route options, discuss the Emerging Best Performing Route Option, and allow for feedback and input to the process.
Step 4b Where exactly should we build?	**Interaction 4**	**Route Selection** Will occur before any public announcement/consultation event on the Best Performing Route Option. It is to allow input into the selection process of the Best Performing Route Option.
	Interaction 5	**Preliminary Design** Will occur before planning submission. It is to allow input on the preliminary design, including all design aspects.
Step 5 The Planning Process	**Interaction 6**	**Planning Submission** Formal consultation on planning submission undertaken by An Bord Pleanála (ABP)/Local Authority.
Step 6 Construction	**Interaction 7**	**Detailed Design (ESBN)** Will commence prior to construction and will continue through the construction phase. It is consultation with ESB Networks on Detailed Design and Construction.

3.3. Interaction 1 – Step 3 - Project Introduction

Purpose:

- Project Introduction.
- Agree future interactions.
- Outline available technology options and allow feedback to be fully considered.

Who:

- EirGrid, ESBN, TII, Local Roads Authorities + others as identified specific to project.

When:

- Early in Step 3 after completion of Step 1 and Step 2. Interaction 1 will occur ahead of Announcement of Study Area and possible Technology Options/Public Consultation for projects that are considering underground cable options in the road.

What:

- For Transmission Network Projects where underground cables in roads may be considered as an option.
- Introduction of Transmission Network Project by the EirGrid Project team, with indicative timelines.
- Overview of the proposed study area and available technology options (e.g. overhead line, underground cable, etc). Indicative Layouts and route corridors to be provided at Step 4a following surveys, design and assessment, and consultation with potentially affected landowners.
- General desktop information on the roads and land-use characteristics that might influence an underground route.
- Explanation of EirGrid Multi Criteria Analysis (MCA) process and development of sub-criteria detail
- Explanation of how the Best Performing Technology Option will be selected through MCA.
- Request for key constraints; existing road infrastructure; known roads projects in the study area; and for feedback to the MCA process.

Intended Outcomes:

- TII and Local Authorities engaged early in the project.
- The approach to selecting the Emerging Best Performing Technology Option is outlined to TII and Local Authorities and their feedback is incorporated into the selection process.
- Roads Sector to offer relevant desktop information on general roads and local land-use conditions, environmental and other factors. Details of intended roads upgrades may be particularly useful. Approach to future interactions is to be agreed.
- Roads Sector/local knowledge is captured to effectively inform technology option selection and further feasibility study and constraints analysis.

3.4. Interaction 2 – Step 3 – Technology Selection

Purpose:

- Explanation of EirGrid selection of Emerging Best Performing Technology Option.
- Allow for feedback on that selection.
- Start input to route corridor option selection.

Who:

- EirGrid, ESBN, TII, Local Roads Authorities + others as identified specific to project.

When:

- Late in Step 3, following step 3 feasibility studies, prior to Announcement of Emerging Best Performing Technology Option /Public Consultation.

What:

- Presentation on the findings of the feasibility studies and constraints analysis, to explain which Technology Option is identified as the Emerging Best Performing Technology Option (e.g. overhead line, underground cable, etc).
- TII and Local Authorities will review and provide comments and observations for consideration.
- TII and Local Authorities to advise on any planned infrastructure changes in the study area, provide technical insight on existing infrastructure and technical input to multi-criteria analysis to inform Best Performing Route Option.
- EirGrid, ESBN, TII and Local Authorities to discuss the application of good practice guidance and identify any particular areas of concern.
- Based on the Technology Option selected, discussions will include design aspects such as joint bays, bridge crossings, drainage consideration, other utilities, etc. These design aspect discussions will continue at all subsequent interactions with the level of detail increasing appropriate to the project step.
- Long-list of potential route corridors to be discussed through the interactions. These potential route corridors would be subject to further work at Step 4a.

Intended Outcomes:

- The selection of the Emerging Best Performing Technology Option is explained to TII and Local Authorities, prior to public consultation.
- Public consultation occurs on the Emerging Best Performing Technology Option and is incorporated into the last round of the technology option MCA process.
- Best Performing Technology Option is selected, necessary EirGrid gateway approval is gained, and the project progresses to step 4 route selection.
- Clear timeline and agreement on further interactions through Steps 4-6.
- EirGrid updated on any latest road infrastructure developments if not previously known.
- Post Meeting: Input from TII and Local Authorities to inform creation of Route Options.

3.5. Interaction 3 – Step 4a – Route Options

Purpose:

- Review the study area, constraints mapping, opportunity corridors and their characteristics, including traffic, road asset characteristics and conditions, environmental features, likely ground conditions and other local factors.
- Introduce the shortlist of route options/corridors which are intended to be presented to the public following review of all options and omission of those not feasible.
- Review feedback and populate MCA criteria scoring, with due regard to roads and traffic information, likely impediments (bridges, culverts), other utility assets and any planned infrastructure.
- Identify Emerging Best Performing Route Option and key issues for consideration in the detailed surveys and design process.
- Allow for feedback and input to the process.
- Allow for input into targeted site investigations so that requisite information on potentially impacted assets is obtained for maintenance authorities.

Who:

- EirGrid, ESBN, TII, Local Roads Authorities + others as identified specific to project.

When:

- During Step 4a, ahead of Announcement of Route Options/Public Consultation.

What:

- Introduce the short-list of route options and discuss the Emerging Best Performing Route Option (EBPO).
- Overview of findings of investigations including any surveys, design and assessment, and consultation with potentially affected landowners.
- Explanation of how the Best Performing Route Option will be selected through Multi Criteria Analysis (MCA).
- Request technical insight on existing infrastructure, and technical input to multi-criteria analysis to inform Route Options, specifically including Residual Delay costs (traffic volumes and level of service impacts).
- TII and Local Authorities to advise on any planned infrastructure changes or critical constraints in the study corridor and provide technical insight on existing infrastructure.
- TII and Local Authorities will review the proposed route options and provide comments. EirGrid will consider and respond to all points raised.
- Based on the Technology Option selected, discussions will include design aspects such as joint bays, bridge crossings, drainage consideration, other utilities, etc. These design aspect discussions will continue at all subsequent interactions with the level of detail increasing appropriate to the project step.

Intended Outcomes:

- Engagement ahead of Public Consultation: Understanding of and input into the Route Options to be presented.
- Relevant economic and technical criteria relating to roads infrastructure to be considered as part of route assessment (including residual delay costs).
- Confirmation if succeeding protocol interactions need to continue as a result of the EBPO route selection.

3.6. Interaction 4 – Step 4b – Route Selection

Purpose:

- Allow input into the selection process of the Best Performing Route Option.

Who:

- EirGrid, ESBN, TII, Local Roads Authorities + others as identified specific to project.

When:

- Early in Step 4b, prior to finalisation of MCA and selection of the Best Performing Route Option.

What:

- EirGrid to present the outcome of the public consultation, enabling TII, Local Roads Authorities and other stakeholders to knowledgeably discuss the project with their own stakeholders.
- Provide technical insight on existing infrastructure, and technical input to multi-criteria analysis to inform Best Performing Route Option.
- TII, Local Authorities to advise on any planned infrastructure changes in the study corridor and provide technical insight on existing infrastructure.
- TII, Local Authorities will review the proposed route and provide comments and observations for consideration and amendment.
- TII, Local Authorities to raise any residual technical road concerns and queries to be considered and or mitigated as part the preliminary design in subsequent interaction.
- Based on the Technology Option selected, discussions will include design aspects such as joint bays, bridge crossings, drainage consideration, other utilities, etc. These design aspect discussions will continue at all subsequent interactions with the level of detail appropriate to the project step.
- If the technology and route selection have not determined in-road underground cables, the interactions can be halted at this point.

Intended Outcomes:

- All parties understand the route options, route selection criteria including multi-criteria assessment and the outcome of the optioneering process.
- All parties understand the outcome of the public consultation.
- Post meeting: Determination of the final route selection, key impacts and essential road mitigations to be assessed as part of the preliminary design and planning process.
- Confirmation if succeeding protocol interactions need to continue as a result of the Best Performing Option selection.

3.7. Interaction 5 – Step 4b – Preliminary Design

Purpose:

- Input to Preliminary Design, all design aspects.

Who:

- EirGrid, ESBN, TII, Local Roads Authorities + others as identified specific to project.

When:

- Before end of Step 4b.

What:

- Presentation of Preliminary Design: EirGrid will prepare and submit a 'Design Pack' which provides sufficient detail to allow TII, Local Authority Roads team, and other stakeholders to review and provide comment on the Transmission Network Project. Such details to be considered and agreed on a project basis and include (non-exhaustive):
    - Extent of Planning Application Boundary
    - Pavement condition and reinstatement
    - Road geometry and junction layouts
    - Drainage details
    - Geotechnical requirements
    - Traffic management
    - Other utilities
    - Structural requirements
- Review of Preliminary Design undertaken by TII and Local Roads Authorities with timely feedback issued to EirGrid, who will consider and respond to all comments.
- EirGrid and TII, Local Roads Authorities to discuss the Preliminary Design phase guidance (Working Groups 4 and 5 of the HV Forum – currently being drafted).
- Completion of Planning Documentation sufficient for the statutory consenting process, supported by 'Agreement in Principle' confirmation by the relevant Roads Authorities. This recognises that there will be further matters of detail to be agreed under the Road Opening License process as the detailed design is completed following project handover to ESBN. Meeting recommended for all sizes of in-road underground cable projects.

Intended Outcomes:

- Feedback received on Preliminary Pre-planning Design prior to submission to ABP/Local Council
- Clarification of specific areas of concerns and commitment from EirGrid to how they will be resolved.
- Agreement in Principle to the planning submission of the Transmission Network Project by TII and LAs followed by the submission of the planning application.

3.8. Interaction 6 – Step 5 – Planning Consultation

Purpose:

- Completion of statutory planning process, where applicable (i.e. not including exempted development)

Who:

- TII, Local Roads Authorities + others as part of the statutory planning process. EirGrid, as the applicant, remains involved.

When:

- Step 5, following planning submission.

What:

- Formal Consultation on planning submission undertaken by An Bord Pleanála (ABP) or Local Council, depending on nature of Network Project.
- Formal correspondence will be led by ABP or Local Council.
- Where requested, EirGrid may submit further information or provide a further submission to assist all parties.

Intended Outcomes:

- Completion of planning process, following on from the previous interactions through the project.
- Input to the planning conditions, formalising previous points of discussion, as appropriate.
- No formal objections to the planning submission.

3.9. Interaction 7 – Step 6 – Detailed Design

Purpose:

- Input to detailed design and engagement on construction constraints, monitoring requirements, traffic management, temporary diversions and local roads impacts, final reinstatement agreements.
- Remaining statutory consents to be closed out.

Who:

- EirGrid, ESBN, TII, Local Roads Authorities + others as identified specific to project.

When:

- Step 6, during the detailed design process by ESBN, at a stage where sufficient information is available, including understanding of programme and works schedule, precise location of works and impacts on roadworks. These interactions will be managed through the existing Road Opening Licence system.

What:

- On planning permission grant, the detail design is progressed based on the preliminary design including the discharge of relevant planning conditions and completion of site investigations. Remaining statutory consents required to carry out the construction are applied for by ESB Networks (road opening licences (ROL) etc). All conditions of these consents are also included in the completed detailed design.
- The completed detailed design will be submitted to the relevant road stakeholder for information prior to construction
- Meeting recommended for all sizes of the project. Multiple meetings with different stakeholders may be required, e.g. one with TII, Local Roads Authorities and other relevant stakeholders and one with ESBN to focus on handover. The mechanics of this is to be determined by the project team.

Intended Outcomes:

- View of detailed design
- Grant of road opening licences and any remaining Statutory consents.

Further details on the construction and operation are overleaf.

4. Construction Stage Collaboration

EirGrid are responsible for Transmission Network Projects from Step 1 -5. At Step 6, ESBN is responsible for managing and delivering the detailed design and construction and thereafter for maintenance. Both EirGrid and ESBN will be involved in all Steps of the Transmission Network Projects. To ensure continuity, a Project Communication Plan will be prepared. This will be a record of all stakeholder engagement on the project. It will be maintained by EirGrid from Steps 1 – 5 and handed to ESBN to maintain and develop to the needs of construction at Step 6. The plan will be a record of interactions, key issues, and points of agreement with stakeholders. The Project Communication Plan will ensure all key issues are addressed and a clear record is maintained.

Once the Transmission Network Project is energised, ESBN is responsible for the long term maintenance of the high voltage infrastructure to deliver the service requirements of EirGrid. ESBN is committed to continuing collaboration with the Roads Sector including delivery on the commitments and agreements made by EirGrid with the relevant Roads Authorities.

Prior to the handover from EirGrid and the commencement of the construction phase, ESBN will engage with all relevant stakeholders to develop and collate the criteria for design and construction.

This will include:

- Identifying project delivery restrictions and conditions
- Traffic Management scenarios required for safe delivery for the project.
- Project Communication Plan.
- Gather and collate criteria for the road reinstatement conditions (both temporary and permanent).
- Discharge of Planning Conditions.
- Expected project programme.

ESBN will apply for and hold the Road Opening Licence for the Transmission Network Project that directly impacts a public road and will be responsible for the final reinstatement of the road, engaging as appropriate with the RMO and road authorities as per the terms of the Road Opening Licences.

The construction and operation phases will be undertaken in-line with all relevant legislation and guidance documents, such as the Purple Book, Health & safety (Construction) Regulations and the outputs from the HV Forum Working Groups 4 and 5.

The Roads Sector will appropriately resource dedicated teams funded by the Electricity Sector mechanisms in accordance with HV Forum Working Group 4 protocols to ensure efficient delivery of the works in compliance with all design stage agreements and conditions from statutory processes.

The Electricity Sector will progress the following:

1. Dedicated points of contact with appropriate authority for immediate action on urgent issues
2. Proactive Construction stage communications plan
3. Detailed design development for all roads interfaces in compliance with current road design standards and in compliance with HV Forum Working Group 5 protocols, leading to full construction methodology. A dynamic and collaborative process required to cater for unforeseen conditions necessitating localised redesign.
4. Detailed traffic management plan, complete with temporary road works speed limits, road closures and diversion routes as necessary.
5. Preconstruction condition surveys (and structural assessments, as required) for all roads and bridges impacted by Electricity Sector scheme to include proposed diversion routes.
6. Road opening licences and other approvals to include abnormal (and Exceptional Abnormal) load permitting and Section 53 approvals for Motorway crossings as necessary.

7. Provision of certification and associated test results for all elements incorporated into the road environment, as per the Road Opening Licence.
8. Appropriately detailed as build records with full details of maintenance requirements attaching to the high voltage transmission underground cable circuits interfacing with the public roadway to the Roads Authority.

Formal approval process will be agreed for project quality assurance through the full construction process to include all items detailed in 3-8 above.

5. Operations Stage Collaboration

During the operational phase, ESBN will be responsible for maintenance, inspection and repairs arrangements of the high-voltage underground infrastructure post construction. EirGrid are responsible for the operation of the transmission system. If road access is required for maintenance during the operational phase, ESBN will consult with the relevant road authority and will use the existing Road Opening Licence process to ensure safety working, provide notice and agree traffic management and reinstatement requirements.

Should the Roads Authorities seek to work on a road with an underground cable, the existing tri-partite 'TII ESB EirGrid Protocol (October 2020)' will be followed and ESB's "Dial-Before-You-Dig" system will be a key reference. For new high voltage transmission underground cable circuits developed in accordance with this Protocol, the principles of collaboration will continue to apply. To facilitate this collaboration, the following arrangements will be put in place prior to energising of the line.

The Electricity Sector will at a minimum provide the following:

1. Dedicated points of contact for Roads Sector engagement on all transmission system projects delivered under this protocol.
2. Protocol clearly outlining what can and cannot be done in proximity to HV underground cables in public spaces.
3. Roads Sector Charter that covering the Electricity Sector's participation in Roads Sector management of both routine and emergency road maintenance interface issues post high voltage plant installation. This should cover appropriate response time for routine maintenance or Local Authority project consultation requests, emergency response times, deenergising protocols and any oversight requirements.
4. Costs arising from this process dealt with in accordance with HV Forum Working Group 4 protocols.

Appendix 1 - Communications and Collaboration Guidance

Communications and Collaboration Guidance

NB The content of this appendix is indicative only. All Interactions must be agreed from the outset and made project specific at Interaction 1. The Project Interactions must be made suitable to each project, based on its complexity, study area, and the agreement of all parties. Project Interactions can also change during the span of the project with the agreement of all parties.

Approach to Strategic and Project Interactions

Agenda

A proposed agenda will be drafted by the EirGrid Project Manager and circulated to the attendees for comment. This will be issued a minimum of five working days ahead of the meeting.

Chair

The meetings will be chaired by the EirGrid Project Manager; however, the meetings will be inclusive of all attendees and are intended to be collaborative.

PowerPoint Presentations

If required, any presentations will be short, to the point, and informative. A copy of the presentation will be made available to all attendees after the meeting within five working days.

Minutes

The EirGrid Project Manager will be responsible for preparing minutes for each meeting. The minutes will focus on actions and key issues raised. They will be drafted a maximum of five working days after the meeting and circulated for comment by all attendees before being finalised.

Data Management

All files (presentations, minutes, drawings, etc) will be made available to all attendees via a file transfer site, hosted by EirGrid (e.g. SharePoint). EirGrid will be responsible for arranging access for all attendees and ensuring the data is properly maintained.

If position papers or technical issues are to be discussed at the meeting, copies of the data should be made available a minimum of five working days ahead of the meeting. This is to allow all attendees to be familiar with the matters ahead of the meeting.

All parties will ensure that the confidentially of any data and information is maintained and will not be passed to any other parties without consent.

Inclusiveness

All meeting attendees will be respectful of each other and open to suggestions from all attendees. The meetings will be inclusive of all attendees and the Chair of meetings and Interactions will be responsible for ensuring that all attendees are heard, and their inputs are fully considered. Should any special needs be identified, the Chair will facilitate these as required.

Timescales

At the Project Interactions, requests will likely be made for clarification of certain points or for existing data. All attendees will do their best to respond to queries in a responsible time period. It is difficult for this document to state timescales as the time required for a task will vary depending on its complexity and number of people involved to resolve it. A maximum of five working days is recommended for completion of clarifications, queries or data transfers. The timescale for specific actions arising from the Project Interactions should be agreed during the Project Interaction. If additional time is needed, the attendees should be contacted with an explanation for the delay and a revised date.

Escalation

All attendees of the Strategic and Project Interactions are required to work in the spirit of cooperation in order to deliver and maintain vital public infrastructure. In the unlikely event that matters cannot be resolved at a project level, senior personnel from all parties can be contacted for advice and resolution.

Strategic Interactions

The purpose of the Strategic Interactions is discussed in the main body of this document. This will require an appropriate 'Standing Committee' of senior members of both sectors. The Strategic Interactions will be held on a quarterly basis. The meetings will ideally be face-to-face but virtual attendance will be facilitated. The meetings will be co-ordinated by EirGrid with input from all attendees.

Project Interactions

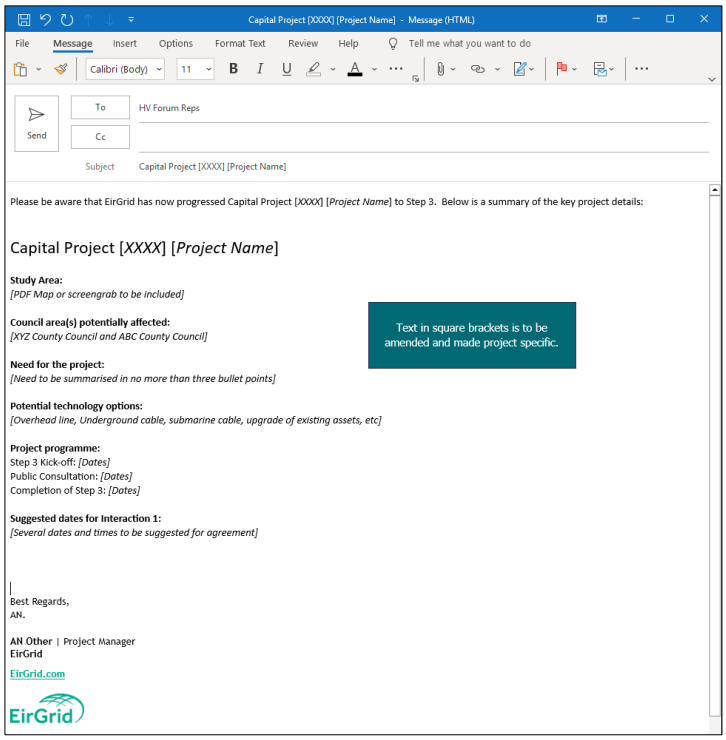
The purpose of the Project Interactions is discussed in the main body of this document.

Setup

When a Transmission Network Project, which has the potential to interact with the road network, enters Step 3, the EirGrid Project Manager will email all relevant parties to describe:

- Study area.
- Council area(s) potentially affected.
- Need for the project.
- Potential technology options.
- Project programme.
- Suggested dates for Interaction 1.

The email should be succinctly drafted without excessive attachments to allow the key information to be easily processed. An example email is set out below. Further project details would be made available on request or at Interaction 1.



As outlined in the main body of the report, Project Interactions are engagement opportunities and this can mean emails, a meeting, or a series of meetings. The approach to the Interactions will be agreed at Interaction 1. The approach will depend on the wishes of the attendees, the nature, complexity, and location of the Transmission Network Project, and the degree of interaction between the Network Project and the road network. It is recommended that all Interactions be meetings (face-to-face and/or virtual) with two hours allowed for each meeting (to be agreed by attendees).

As the Network Project moves through the project steps, the level of technical data will be become more detailed. Where reports, designs, or other data is to be issued for comment, these will be issued a minimum of10 working days in advance of any meeting. Depending on the complexity, additional time may be agreed.

Lakshmi Priya

From: Lagan, Fay (EXT) <Fay.Lagan@Eirgrid.com>
Sent: Friday 5 December 2025 09:36
To: Aisling Thompson; STATUTORY NOTIFICATIONS
Cc: Ellen Costello; Catherine Johnson; Ciarán Fitzgerald; Mail - john.gibbons@esbi.ie; O'Reilly, Ciaran (EXT); Coldrick. Roy (Engineering and Major Projects)
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

You don't often get email from fay.lagan@eirgrid.com. Learn why this is important

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Aisling,
Thanks very much for the email. We have discussed it internally and we would like to have a Teams meeting to discuss potential interactions with nearby the Kildare-Meath Grid Upgrade project - https://www.eirgridkildaremeath.ie/

While there are no direct interactions, it would be useful to discuss cumulative effects on disruption due to construction, etc. We can also discuss the consultations we have had with Kildare CC regarding in-road UGC.

Could you suggest a few times that would suit your team and I'll coordinate from our end? Personally, not 12th, 18th, 19th.

Best Regards,
Fay.

Fay Lagan | Planning and Environment Unit
EirGrid
M: + 353 (0)86 169 3949

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:18
To: STATUTORY NOTIFICATIONS <StatutoryNotifications@Eirgrid.com>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and

adjacent townlands. MKO would have previously carried out scoping with Eirgrid in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 10:54
To: 'StatutoryNotifications@Eirgrid.com' <StatutoryNotifications@Eirgrid.com>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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Séanadh:

Tá faisnéis (agus/nó ceangaltáin) a d'fhéadfadh a bheith faoi phribhléid nó faoi rún sa teachtaireacht leictreonach seo. Tá an t-ábhar uile beartaithe a bheith d'úsáid an duine aonair nó an aonáin chuig a ndírítear é amháin. Sa chás nach tú an faighteoir beartaithe, bíodh fios agat go bhfuil cosc ar aon nochtadh, cóipeáil, dáileadh nó úsáid d'ábhair na teachtaireachta seo. Is iad tuairimí nó barúlacha an údair amháin na tuairimí nó na barúlacha a léirítear sa teachtaireacht seo, agus b'fhéidir nach ionann iad agus tuairimí nó barúlacha EirGrid. Má shíleann tú go bhfuair tú an ríomhphost seo trí earráid, cuir é seo in iúl don seoltóir láithreach le do thoil. Cé go scanann EirGrid ríomhphoist agus ceangaltáin, ní thugann siad ráthaíocht go mbíonn ceachtar acu saor ó víreas ná ní ghlacann siad aon dliteanas as aon damáiste a dhéantar de thoradh víreas.
****

EIRGRID AND BALLYDERMOT WIND FARM PROJECT TEAM MEETING MINUTES

Project Reference	Ballydermot Wind Farm (250708)
Date & Time of Meeting	16th of December 2026
Subject	1st Scoping Meeting
Venue	Microsoft Teams
Participants	**MKO:** Ellen Costello (EC), Ciarán Fitzgerald (CF), Aisling Thompson (AT) **Bord na Mona:** Julie Larkin (JL), Paul Cash (PC), John McDonagh (JM), Muriel Ennis (ME) **Eirgrid:** Fay Lagan (FL), Ciaran O'Reilly (COR), Loretta Flynn (LF) **ESB:** Roy Coldrick (RC), John Gibbons (JG)
Author(s)	Aisling Thompson (AT), Ciarán Fitzgerald (CF)

Table 1 Meeting Minutes

Item	Description
1.0	**Introduction/ Agenda** EC thanked all for joining meeting and introduced MKO participants, BnM, Eirgrid and ESB participants introduced themselves. EC provided overview of the meeting agenda, as previously set out.
2.0	**Project Overview** › EC gave an overview of the Ballydermot Wind Farm Project (hereafter referred to as the Proposed Project) and the phases involved and asked CF to present a figure showing both the Eirgrid's UGC 400kV project and Proposed Project on the same map. › The map identified that theres will be no spatial overlap between the two projects.

3.0	**Construction** › FL states that Eirgrid would like to know if there will be any overlaps during Eirgrids UGC project and the Proposed Project during the construction phases. › PC asked for Eirgrid's target start dates, COR gave detail regarding the project timeline and that the current phase of the project is that they have obtained planning permission, ESB are now working on the design phase, and then it will be handed back to Eirgrid › JG states that an exact expected timeline will be available in Summer 2026, after the project has gone out for tender. JG said after the design is competed, it will then move on to survey stage, followed by trenching in early 2027, and cable installation in 2028, the last phase will betesting and energising in late 2029.
4.0	› PC asked if JG thinks it will be a 2 year construction phase, and JG replies with 2 and a half years. JC confirmed that the construction phase is expected to be carried out from January 2027 to August 2029. › EC asked Eirgrid if the EIAR associated with the project is accurate and reflects the construction phase correctly. JG said it will be similar, however the start date may differ.
5.0	› EC acknowledged the low probability of impacts on or between the projects, however regardless the Eirgrid 400KV Grid project will be considered cumulatively as a precautionary measure incase of timing crossovers due to delays.
6.0	› PC asked JG if they will have multiple construction crews, JG replied yes 3-4 crews, with main works between 2027 and 2028.
7.0	› EC asked if this is the same timeframe as the EIAR states, FL replied it is delayed a year from what is stated in EIAR de to legislation changes. FL replied that the construction timetable is in Vol 2 CH5 p72 of their EIAR.
8.0	› PC asked Eirgrid and ESB even with significant delays, would trenching be completed by 2028 the latest. › COR responded that they will be undertaking works on their most straight forward utility works first and that there will be no changes to the cumulative movements, but until after Summer 2026 there could be changes, and that it would be beneficial to both parties to provide an update after this.
9.0	› EC stated that traffic and transport cumulative grid overlap seems very low, however if there are any updates to the EIAR after the summer 2026, Eirgrid can inform MKO and BnM of those changes.
10.0	**Abnormal loads** › FL stated there are concerns regarding the abnormal load transfers, that new clearing house will bring some light on this scheduled Q1 2026. PC confirmed plans for trasfers are to be done of the WF side of the Ballydermot WF, coming through Offally. FL suggested coordination between everyone regarding clearing house in the future. Advised MKO/BnM to consult early and often for projects , and that has been shown to be done through this meeting. › PC says the internal cabling doesn't run along public roads. COR advised to contact Cerril Beggy in K.CoCo. JL confirmed meeting with KCoCo&OCC already and another one is scheduled. JB confirmed OCC and KCC in favour of project but had highlighted concerns over transport of abnormal loads. › PC confirmed compliance of guidelines set out by Eirgrid for transport of abnormal loads, and TII, and where possible will be off road transport.

11.0	**Meeting finished** FL stated that all Eirgrid queries were answered, JL confirmed the same for BnM, and EC confirmed same for MKO and the meeting was ended.

Lakshmi Priya

From: planning applications <planning.applications@failteireland.ie>
Sent: Tuesday 23 December 2025 08:30
To: Aisling Thompson
Cc: Ellen Costello; Catherine Johnson; Ciarán Fitzgerald
Subject: Re: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Fáilte Ireland EIAR Guidelines 2023.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hello Ashling,

Thank you for your email and letter regarding the Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

Fáilte Ireland recognises the importance of developing the State's renewable energy sector and transition to a low carbon energy. It is the policy of Fáilte Ireland to support the sustainable development of electricity generation by sustainable and renewable sources and support its contribution towards a sustainable energy supply at appropriate locations and in accordance with proper planning and sustainable development.

As a prescribed body in the planning process, one of the main objectives of Fáilte Ireland is to advocate for the protection of key tourism assets and amenities. The Irish landscape is one of the primary assets for tourism in the country and has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore, as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource is protected. We note that the proposed site includes the Lullymore Heritage & Discovery Park, we trust that tourism and the potential impacts on tourism are adequately considered in the future steps/phases of the project.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIA, which you may find informative for the preparation of the Environmental Impact Assessment for the proposed project. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Regards & thanks,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86

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LinkedIn | Twitter | YouTube | Facebook

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:46
To: planning applications <planning.applications@failteireland.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

[AIRE] Tháinig an teachtaireacht seo ó lasmuigh de Fáilte Ireland. Bí cúramach le hipearnasc, le ceangaltáin agus le treoracha sa ríomhphost seo.
[ATTENTION] This message originated from outside of Fáilte Ireland. Please treat hyperlinks, attachments and instructions in this email with caution.

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
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Fáilte Ireland
Turasóireacht Náisúnta
An tÚdara Eorbartha
National Tourism
Development Authority

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

An tÚdarás Náisiúnta Forbartha Turasóireachta
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1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed **9.7 million overseas visitors.**

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location of the project, the technologies and substances used, the construction of the project and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to provide ‘An outline of the main alternatives studied by the developer and an indication of the main reasons for this choice, taking into account the environmental effects’ to ‘a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment’;
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with ‘Land’ being added, ‘Human Beings’ replaced by ‘Population & Human Health’ and ‘Flora & Fauna’ replaced by ‘Biodiversity’;

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

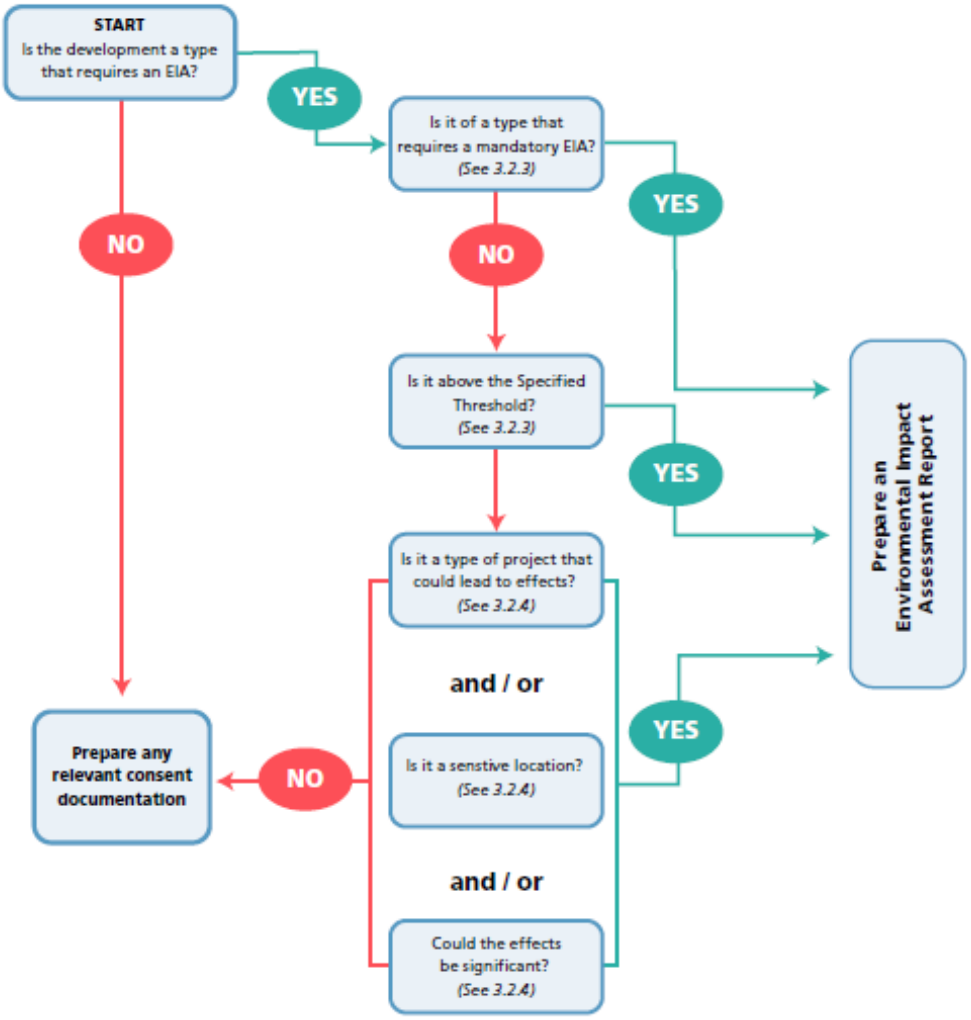
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breath and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

Screening

Through EIA Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised above in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there may still be a requirement for an EIAR for that development (subject to EIA Screening assessment).

EIAR Scoping

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

4. Assessing Tourism

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is *"Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities"*. This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

Projects which involve a tourism element

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious – walking/cycling/forest trails, greenways, blueways, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element can have potential for particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

Projects which may have an impact upon tourism

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture

- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by '*competent experts*'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (e.g. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependent on its **Context, Character, Significance,** and **Sensitivity**, as outlined in the EPA EIAR Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the EPA EIAR Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity *"..which may be relevant under 'Population and Human Health' and 'Landscape'"*.

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc.

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Impacts

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIA Screening Report.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

Mitigation & Monitoring

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy.

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact.

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

With regard to Monitoring, Article 8a of the EIA Directive requires that:

1. 'The decision to grant development consent shall incorporate at least the following information …
(b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. … 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.'

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, Environmental Surveying and Monitoring, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed here

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed here. The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed here.

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible here

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Assemblies

Regional Assemblies can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSESs) should be consulted.

Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.

Lakshmi Priya

From: DCEE Planning Notifications <PlanningNotifications@dcee.gov.ie>
Sent: Tuesday 16 December 2025 15:10
To: Catherine Johnson
Cc: Aisling Thompson
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: 2025.12.16 GSI Submission.pdf

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Dear Catherine,

Please see attached a submission on behalf of Geological Survey Ireland (a section of the Department of Climate, Energy and the Environment) with regard to the subject entity.

Please send an acknowledgement of receipt to PlanningNotifications@dcee.gov.ie at your earliest convenience.

Kind regards,
Luke Thompson

Luke Thompson, Administrative Officer
Planning Advisory Section

An Roinn, Aeráide, Fuinnimh agus Comhshaoil
Department of Climate, Energy and the Environment

Teach Tom Johnson, Bóthar Haddington, Baile Átha Cliath, D04 K7X4
Tom Johnson House, Haddington Road, Dublin, D04 K7X4

M +353 (0)87 336 7599
luke.thompson@dcee.gov.ie

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:21
To: DCEE GSI Planning <GSIPlanning@GSI.ie>
Cc: Patricia Smullen (DCEE) <Trish.Smullen@gsi.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Ms Trish Smullen,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Geological Survey of Ireland in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 15:33
To: 'clare.glanville@dccae.gov.ie' <clare.glanville@dccae.gov.ie>
Cc: 'john.butler@gsi.ie' <john.butler@gsi.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon Clare,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

An Roinn Aeráide, Fuinnimh agus Comhshaoil
Department of Climate, Energy and the Environment

Geological Survey
Suirbhéireacht Gheolaíochta
Ireland | Éireann

Aisling Thompson
MKO
Tuam Road
Galway, H91 VW84

11 December 2025

Re: Proposed Wind Farm Development at Ballydermot, Co Offaly & Co Kildare
Your Ref: 250708
Our Ref: 25/196

Dear Aisling,

Geological Survey Ireland is the national earth science agency and is part of the Department of Climate, Energy and the Environment. We provide independent geological information and interpretation and gather various data for that purpose. Please see our website for data availability.

With reference to your email received on the 04 December 2025, concerning the Proposed Wind Farm Development at Ballydermot, Co Offaly & Co Kildare, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' Data & Maps (gsi.ie) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

For specific data available for Environmental Assessment and Planning topics please follow this link [Data by Environmental Assessment and Planning Topic (gsi.ie)], where you will find our data arranged by environmental assessment topic as illustrated below:

Land and soils
Soil • Subsoils (Quaternary Geology) • Tellus Geochemistry • Geotechnical *Geology* • Bedrock • Geophysics • Bedrock & Quaternary 3D

Water
Groundwater • Aquifers GW vulnerability, GWPSs (GWPPs) *Surface water* • Tellus Geochemistry *Estuarine & marine waters* • Marine and coastal *Flooding* • GWClimate • Karst

Climate Change
Carbon accounting / Carbon balance • Geothermal • Carbon capture and storage *Climate change trends* • National coastal change assessment

Cultural Heritage
Archaeology • Cherish *Underwater Archaeology* • Shipwrecks

Material Assets
Built Services • Natural resources (Minerals & Aggregates) • Active quarries

The Landscape
Landscape Appearance & Character • Physiographic units *Historical landscapes* • Historic mines

Other Relevant Data		
Natural (Geo) hazards • Landslide Susceptibility Mapping • Groundwater flooding • Coastal vulnerability • Subsidence • Radon	*Natural heritage* • Geoheritage (County Geological Sites) • Dimension Stone/Stone Built Ireland	

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be redacted for confidentiality and added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at mailto:GeologicalMappingInfo@gsi.ie.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

Trish Smullen
Geologist
Geoheritage and Planning Programme
Geological Survey Ireland

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.

Lakshmi Priya

From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Thursday 29 January 2026 14:57
To: Aisling Thompson
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare EIA Scoping
Attachments: NEHS submission on EIA Scoping Application Ballydermot, Co. Kildare & Co. Offaly (5501).pdf

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Please find enclosed observations from the National Environmental Health Service on the scoping of the EIA for Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Any clarification required should be sent in the first instance to Andrew.sulley@hse.ie

Regards,



"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil . Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúil don Deasc Seirbhísí ECT ar an nguthán ag +353 818 300300 nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2

National Environmental Health Service Submission Report

Date: 27th January 2026

Our reference: ID5501

Your ref: 250708

Report to Catherine Johnson Environmental Scientist McCarthy Keville O'Sullivan Ltd.

Type of Consultation: EIA Scoping

Re: Informal Scoping Reporting – EIA Scoping for the Proposed Wind Farm in the townland of Ballydermot and surrounding townlands on the border of County Kildare and County Offaly

The following HSE stakeholders were consulted on the 4th December 2025

- Emergency Planning – Brendan Lawlor
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O'Moore/ Ina Kelly
- REO Dublin and Midlands – Kate Killeen White

Any clarification on these observations should be made in the first instance to Andrew Sulley at

Andrew.sulley@hse.ie



HSE EIA Scoping

National Environmental Health Service Submission Report

Type of consultation:EIA Scoping

Our reference: ID5501

Your ref: 250708

Please note. Any statutory consultation under the Planning Acts with the HSE should be directed to environmental.health@hse.ie

Proposed Development:

The Proposed Development will include the following elements;

47 no. wind turbines with an overall tip height of 200m on the outer ring, and 220m in the centre, Access roads and entrance(s),

Onsite 220kV substation and wind farm control buildings,

5 no. pump stations, Electrical cabling for grid connection,

Temporary construction compounds, Permanent anemometry mast.

Approximately 150 km of internal site roads. Amenity tracks and car parks.

Consideration of the Scoping Report Submitted

The NEHS has considered the scoping document dated 4th December 2025 for this proposed EIA and has no specific comments with regard to the areas outlined in the document. The general comments in this submission overlap some of the areas in the scoping document and inclusion in this submission does not imply that the details in the scoping document are inadequate. The NEHS details opinion on scoping in their submission to form a structure for the NEHS to consider the EIAR when it is submitted with the planning application.

The number of proposed turbines and their proposed size indicate this will be one of the largest proposed developments of this nature ever under taken in Ireland. It is therefore important that the consultation process informs design and is not used as a predominately consensus building exercise.

General Introduction

The following documents should be taken into consideration when preparing the Environmental Impact Assessment Report (EIAR):

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf

EU publication: Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report, EU, 2017

http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf

National Guidance issued by the Environmental Protection Agency on the Information to be Contained in Environmental Impact Assessment can be found at:

https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php

This Guidance is supported by a Webinar produced by the EPA and can be found at:

https://www.youtube.com/embed/ejKVFUztxBY

The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm. (2021 IEHC 390 [20202 No. 557 JR] P. Sweetman v An Bord Pleanála)

And with regard to general noise considerations of noise and wind farms the judgement in [2024] IEHC 136 [2018 8457 P] MARGARET WEBSTER AND KEITH ROLLO AND MEENACLOGHSPAR (WIND) LIMITED

The Environmental Impact Assessment (EIA) should examine all likely significant effects from the proposed development and provide the following information for each:

a) Description of the receiving environment

b) The nature and scale of the impact

c) An assessment of the significance of the impact

d) Proposed mitigation measures

e) Residual impact

Directive 2014/52/EU has an enhanced requirement to assess likely significant effects on Population and Human Health. It is the experience of the NEHS that impacts on human health are often inadequately assessed in EIAs in Ireland. It is recommended that the wider determinants of health

and wellbeing are considered in a proportionate manner when considering the EIA. Guidance on wider determinants of health can be found at www.publichealth.ie

In addition to any likely significant negative effects from the proposed development, any positive likely significant impacts should also be assessed.

The NEHS will consider the final EIAR accompanying the SID/Planning application and will make comments to An Bord Pleanála/Local Planning Authority on the methodology used for assessing the likely significant effects and the evaluation criteria used in assessing the significance of the effect.

The NEHS recommends that the following matters are included and assessed in the EIA:

- Public Consultation
- Population and human health
- Decommissioning phase of the proposed wind farm
- Siting and location of turbines
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Ancillary facilities
- Cumulative impacts
- Climate
- Health gain

Public Consultation

It is recommend that early and meaningful public consultation with the local community is undertaken to ensure all likely significant effects of the proposed windfarm development have been adequately addressed.

All parties affected by the proposed development, including those who may benefit financially from the project, must be fully informed of what the proposal entails especially with regard to potential impacts on surrounding areas.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to reduce the likelihood of any complaints about the proposed wind farm development in the future.

Members of the public should be given sufficient opportunity to express their views on the proposed windfarm development.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between public consultations and how those consultations have influenced the decision-making process in the EIA.

To assist with the consultation and planning process it is recommended that the applicant develops a dedicated website for the proposed windfarm development. All correspondence, maps, project updates and documentation including the EIAR should be uploaded to the website.

The EIAR should state the period of planning permission sought, the length of time construction is estimated to take and if it is anticipated that the windfarm development will be decommissioned and removed or will continue to operate (following any further planning consent) at the end of this period of planning permission (should permission be granted)

Population Health and Human Health

The opinion of the NEHS is that the assessment of likely significant effects on Population and Human Health should be a proportionate assessment specific to the proposed development and to the Population and Human Health likely to be significantly affected by the proposed development.

If assessment is made of likely significant effects on wider determinants of health or health inequalities, then this should be done in a proportionate manner with a demonstration of a likely significant effect as a direct result of the proposed development.

The preferred methodology for assessing likely significant effects on Population and Human Health is a source, pathway, receptor model; based on emissions through environmental media and population exposure. This approach is supported by the EPA issued National Guidance (known as the EIAR Guidance): Guidelines on the information to be contained in Environmental Impact Assessment Reports, 2022 https://www.epa.ie/publications/monitoring--assessment/assessment/EIAR_Guidelines_2022_Web.pdf

In assessing likely significant effects on Population and Human Health any proposed mitigation measures should be identified. The residual impact should be evaluated against a recognised Health Protection Standard.

Whilst current EIAR guidance recognises the requirement to identify sensitive receptors within the assessment process, it should be clear that this is within a Population Health approach and not an individual person approach.

It is therefore the opinion of the NEHS that a Population Health approach would not consider the likely significant effects on the sensitivity of an individual human receptor, but the sensitivity of the established land use or service provision.

For example, a school would be considered a sensitive receptor within a Population Health approach, but an individual student who was particularly sensitive to noise attending the school would not be specifically considered in the assessment criteria. A health care facility that provided services for people with recognised noise sensitivity would be considered in its entirety as a particular noise sensitive location.

It is therefore the opinion of the NEHS that the EIA should consider the likely significant effects on established land use and service provision and activities within communities and not individual members of communities.

Opportunities for Health Gain

Consideration should be given to opportunities for health gain from the proposed development. This would include opportunities to create recreational spaces, opportunities to increase physical exercise through walking and cycle routes.

Non-Technical Summary

The Non-Technical Summary of the EIA (NTS) is an important document that facilitates public access and understanding of the proposed development. It should accurately summarise the likely significant impacts, proposed mitigation and the residual impacts after mitigation has been implemented, that are attributable to the proposed development. This should be done in non-technical language and relate accurately to the specific chapters of the EIAR. The NTS should identify all sensitive receptors that are likely to be significantly impacted and clearly state the significance of the effects on them. The NEHS considers that a summary should be no more than 10% of the original document size and should cross reference any appendix of the EIAR that contains relevant data on any likely significant effects.

Decommissioning

The EIAR should detail the eventual fate of the wind turbines and associated material i.e. will the material be recycled or how will it be disposed of.

Information should also be provided regarding the proposed methodology to be used for the disposal of the materials forming the foundations of the wind turbines.

The EIAR should indicate the proposed future use of the development site at the end of the planning permission period.

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines.

The NEHS expects that details (height and model) of the turbines to be installed will be available at the time planning permission is sought and will be included in the EIAR.

Details of the foundations for the wind turbine including depth, quantity and material to be used should be included in the EIAR.

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. The EHS recommends that alternative renewable energy options to on- shore wind farms should be assessed as part of the EIAR.

Noise & Vibration

The potential impacts for noise and vibration from the proposed development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and

effectiveness of all proposed mitigation measures and evaluate the residual impact against recognised health protection standards.

A baseline noise monitoring survey should be undertaken to establish the existing background noise levels.

Baseline noise should cover day, evening and night-time periods

Noise from any existing turbines in the area should not be included as part of the background levels.

An assessment of the predicted noise impacts during the construction phase and the operational phase of the proposed windfarm development should be undertaken which details the predicted change in the noise environment resulting from the proposed development.

It is recommended that changes in the noise environment at Noise Sensitive Locations are shown in a tabulated format that shows the predicted change in the noise environment at each noise sensitive location.

An example is shown in the table below

Location 1	**Standardised wind speed at 10 metre height (9m/s) within the site averaged over 10 minute periods**										
	2	3	4	5	6	7	8	9	10	11	12
Noise sensitive location 1 – background noise level											
Noise Sensitive location 1 – predicted LA rated											
Proposed Relative Rated Noise Limit											
Repeat above for all noise sensitive locations											

Standardised wind speed at 10 metre height 9m/s) within the site averaged over 10 minute periods

The NEHS would consider the most appropriate criteria for assessing significance of the predicted noise would be consideration of the **ENVIRONMENTAL NOISE GUIDELINES for the European Region, 2018** The 2018 WHO Guidance set health protection levels for exposure to environmental https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1

The Draft Revised Wind Energy Development Guidelines were published in December 2019. Whilst these have yet to be adopted, any proposed wind farm development should have consideration of the draft Guidelines.

https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf .

It should be noted that in the judgement of **Ms. Justice Emily Egan delivered on the 8th day of March 2024 in *Webster/Rollo V Meenaclogher (Wind) Limited (2024 IEHC 136) 8th March 2024*** it was stated very clearly that considerations should be given to the most up to date knowledge and Guidance when considering impacts from noise. This would include the assessment methodology and the known significance of health effects from exposure to noise.

The current Guidelines for Wind Energy Development are: Wind Energy Development Guidelines (2006)

https://www.gov.ie/en/publication/f449e-wind-energy-development-guidelines-2006/

It should be recognised that the nature of wind energy development has significantly changed since the publication of these Guidelines, particularly the size of the turbines and the proximity to centres of populations and the cumulative effects with other wind energy development. There have also been substantial increases in the body of knowledge around the likely significant effects of the operation of windfarm development on Population Health, in particular around the characteristic of the noise emissions and health effects of shadow flicker.

The noise assessment for the proposed development should consider the likely significant effects of noise and vibration at sensitive receptors from the following aspects:

- Construction noise and vibration from the wind turbine installation; and
- Operational noise from the wind turbines.

The noise assessment should consider the potential impacts of noise generated during the construction, operation, and decommissioning of the proposed development on nearby noise-sensitive receptors.

The assessment should consider all proposed (planning application submitted), consented and operational development that may contribution to noise effects at the receptors.

During the construction phase of the project, it is considered that the potential sources of noise impact will include the mobile plant and the drilling and piling operations necessary to undertake the construction. These operations have the potential to cause noise impacts at sensitive receptors. In addition, the drilling and piling have the potential to cause vibration impacts at sensitive receptors.

During the operational phase of the project, it is considered that the potential sources of noise are aerodynamic noise from the wind turbine blades and any rotational or mechanical noise from the hubs of the wind turbines.

Shadow Flicker

It is recommended that turbine selection will be based on the most advanced available technology that permits shut down during times when residents are exposed to shadow flicker. As a result, no dwelling should be exposed to shadow flicker.

Air Quality

Due to the nature of the proposed construction works generation of airborne dust has the potential to have significant impacts on sensitive receptors. A Construction Environmental Management Plan (CEMP) should be included in the EIAR which details dust control and mitigation measures. Measures should include:

• Sweeping of hard road surfaces

• Provision of a water bowser on site, regular spraying of haul roads

• Wheel washing facilities at site exit

• Restrict speed on site

• Provide covers to all delivery trucks to minimise dust generation

• Inspect and clean public roads in the vicinity if necessary

• Material stockpiling provided with adequate protection from the wind

• Dust monitoring at the site boundary

• Truck inspection and maintenance plan

• Details of a road maintenance agreement between the operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project .

Surface and Ground Water Quality

The proposed development has the potential to have a significant impact on the quality of both surface and ground water.

The NEHS recommends that a walk over survey of the site is undertaken in addition to a desktop analysis of Geological Survey of Ireland data in order to identify the location of private wells used for drinking water purposes.

Any potential significant impacts to drinking water sources should be assessed. All drinking water sources, both surface and ground water, must be identified. Public and Group Water Scheme sources and supplies should be identified in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. Measures to ensure that all sources and supplies are protected should be described.

Details of bedrock, overburden, vulnerability, groundwater flows, aquifers and catchment areas should be considered when assessing potential impacts and proposed mitigation measures.

Any impacts on surface water as a result of the construction of the underground cables should be identified and addressed in the EIAR.

Geotechnical and Peat Stability Assessment *(for peat areas only)*

A detailed assessment of the current ground stability of the site for the proposed windfarm development and all proposed mitigation measures should be detailed in the EIAR. The assessment

should include the impact construction work may have on the future stability of ground conditions, taking into consideration extreme weather events, site drainage and the potential for soil erosion.

Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information.

Reference is made to a peat slide which occurred near Ballybofey in Co. Donegal on 13th November 2020 which may have been linked to construction activity at Meenbog Wind Farm.

Potential impacts on water supply associated with contamination following a peat slide include sedimentation and alteration of pH levels.

The NEHS recommends that a detailed Peat Stability/Geotechnical Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017) https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf

Ancillary Facilities

The EIAR should include details of the location of all site office, construction compound, fuel storage depot, sanitary accommodation and canteen, First Aid facilities, disposal of wastewater and the provision of a potable water supply to the site canteen.

Cumulative Impacts

All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

The impact on sensitive receptors of the proposed development combined with any other wind farm/renewable energy developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed windfarm development.

For each technical discipline, an assessment should be made of the likely cumulative effects of the proposed development in combination with any other similar developments in proximity to the site which are reasonably defined and understood; these would comprise projects that*:*

- are the subject of valid planning applications or appeals but not yet determined;
- consented development; or
- development under construction.

Cumulative effects can also arise from the combined impact of effects attributable to the proposed development in respect of a particular receptor, such as the combined effect of noise and shadow flicker on a residential dwelling

Climate

Climate Mitigation

The EIA should assess factors that contribute to climate change as a result of the proposed development and should identify any mitigation or sustainability measures that can be incorporated into the development, particularly:

a) An assessment of Green-House Gas emissions (the nature and magnitude of such emissions) as a result of the proposed development to include the construction, operation and decommissioning phases. This assessment should identify how emissions can be reduced or mitigated at each stage.
b) An assessment of water usage and opportunities for water conservation, including rainwater harvesting and recycling of both process and rain water,
c) An assessment of energy usage and the opportunities to use renewable energy sources and reduce energy demands. This should include transport and machine use during construction and operation.
d) An assessment of any waste generated at each stage of the development and implementation of the Waste Hierarchy.

Climate Vulnerability

The EIA should consider the vulnerability of the proposed development to climate change.

This should be specific to the project and include an assessment of the risks to the project associated from direct weather-related hazards during both the construction and operation phase of the proposed development. For example:

a) Risks to the proposed development associated with flooding,
b) Risks to the proposed development associated with storms events,
c) Risks to the proposed development from extreme heat events,
d) Any risks to the security of energy or water supplies



Aisling Thompson

From: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Sent: Thursday 4 December 2025 16:07
To: Aisling Thompson
Cc: Catherine Johnson; Ellen Costello; Ciarán Fitzgerald
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Iarnrod Eireann Cover Letter - 2025.12.03 - 250708.pdf; Ballydermot WF Constraints and Design EIAR Scoping Doc - F - 2025.12.04 - 250708.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Aisling,
I reply to your email of 04 December 2025. This proposed development is remote from the Iarnród Éireann railway network and therefore does not concern Iarnród Éireann.

Regards,

Colin Hedderly
Senior Track & Structures Engineer, Iarnród Éireann/Irish Rail, CCE Dept,
Old Railway Station, Grace Road, Athlone, Co. Westmeath, N37 C573.

Mobile: 087 9681735 E-mail: colin.hedderly@irishrail.ie



From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:50
To: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Mr Hedderly,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with

infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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Colin Hedderly
National Environmental Health Service, Health Service Executive, Health Centre
Kildare Local Health Office, Kildare Food Control,
The Crossings
Naas
Co Kildare

Our ref: 250708

Date: 3rd of December 2025

Re: Informal Scoping Reporting – EIA Scoping for the Proposed Wind Farm in the townland of Ballydermot and surrounding townlands on the border of County Kildare and County Offaly.

Dear Mr. Hedderly,

Bord na Móna Powergen Ltd. is investigating the potential for a Proposed Development at Ballydermot and surrounding townlands on the border of County Kildare and County Offaly. McCarthy Keville O'Sullivan Ltd. (MKO) has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. The Proposed Development will be located within the Allen Bog Group -503-01 (EPA IPC License No. P0503-01), which comprises 14 No. bogs and is located on the border of County Offaly and County Kildare. The bogs include: Ticknevin, Glashabaun North, Glashabaun South, Codd 1, Codd 2, Ballydermot North, Ballydermot South, Blackriver, Lullymore, Lullybeg, Barnaran, Killina, Derrybrennan and Lodge. The proposed study area measures approximately 5,581 hectares.

The Proposed Development will include the following elements;

- 47 no. wind turbines with an overall tip height of 200m on the outer ring, and 220m in the centre,
- Access roads and entrance(s),
- Onsite 220kV substation and wind farm control buildings,
- 5 no. pump stations,
- Electrical cabling for grid connection,
- Temporary construction compounds,
- Permanent anemometry mast.
- Approximately 150 km of internal site roads.
- Amenity tracks and car parks.

Cabling will connect with the Killybegs Substation via 11.5 km of underground cabling, along the R414 road towards Prosperous, turning south along the L6002. All wind farm site cabling, including connection to the onsite 220kV substation from the proposed turbines will be laid underground. The Proposed Development will also include for the development of recreation and amenity facilities within the Proposed Development site with further potential to link into existing or proposed recreation and amenity developments in the wider area.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), under the provisions of Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to both Offaly County Council and Kildare County Council

As part of the EIAR process we would welcome any comments that you might have in relation to the Proposed Development, 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. In order to facilitate this, a scoping document providing details of the proposed project is enclosed with this letter.

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,



Catherine Johnson
Environmental Scientist
McCarthy Keville O'Sullivan Ltd.

McCarthy Keville O'Sullivan Ltd t/a MKO. Registered in Ireland No: 462657. VAT No: IE9693052R
MKO Water Limited t/a MKO. Registered in Ireland No: 338589. VAT No: IE6358589Q
MKO Estates & Project Management Ltd. Registered in Ireland No: 613029. VAT No: 3497897JH

Lakshmi Priya

From: Aisling Thompson
Sent: Thursday 11 December 2025 11:22
To: Donnachadh Byrne
Cc: Ellen Costello; Catherine Johnson; Ciarán Fitzgerald
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Watercourse crossings at Proposed Development-Grid Connection F 10.12.2025 250708.pdf; Watercourse crossings at Proposed Development-Turbines F 10.12.2025 250708.pdf

Hi Donnachadgh,

I have attached two maps showing where the Proposed Development infrastructure will interact with watercourse crossings. I have broken this down into two maps to give a closer look at both the turbine infrastructure and the grid connection infrastructure. The maps display both watercourses recorded by the EPA, as well as additional watercourses recorded by MKO when undertaking site surveys.

The exact locations are provisional and may be subject to change following further multidisciplinary surveys but hopefully this will assist you in your assessment.

If you have any further questions, please don't hesitate to ask.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Donnachadh Byrne
Sent: Tuesday 9 December 2025 14:37
To: Aisling Thompson
Cc: Ellen Costello ; Catherine Johnson ; Ciarán Fitzgerald
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Some people who received this message don't often get email from donnachadh.byrne@fisheriesireland.ie. Learn why this is important

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Hi Aisling.

Please see attached copy of the IFI response to scoping request.

Given the huge scale of the project it is very difficult to zoom in to where the proposed infrastructure will intersect with watercourses and how it relates to existing infrastructure (watercourse crossings etc) with the maps provided.
Very interested in locations of any new and old watercourse crossings also.

Would you be able to provide maps that might allow us to make a better assessment of the proximity of any proposed infrastructure to watercourses.

Many thanks,

Donnachadh

Donnachadh Byrne
Senior Fisheries Environmental Officer
Donnachadh.Byrne@fisheriesireland.ie • +353 (0)52 6180 055 • www.fisheriesireland.ie • E91 RD25



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From: info <info@fisheriesireland.ie>
Sent: Thursday 4 December 2025 15:17
To: Noel McGloin <Noel.McGloin@fisheriesireland.ie>; Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon All
Below email received to Citywest Info
Kind regards
Yvonne

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:21
To: ERBD <erbd@fisheriesireland.ie>; info <info@fisheriesireland.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Inland Fisheries Ireland in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
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From: Karen Mulryan
Sent: Tuesday 2 February 2021 12:19
To: 'info@fisheriesireland.ie' <info@fisheriesireland.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist
MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Aisling Thompson
MKO, Environmental Consultants
Tuam Road
Galway
H91VW84

08 December 2025

EIAR scoping re BnM Powergen Ltd re Ballydermot Windfarm, Counties Kildare and Offaly.

Dear Ms. Thompson,

IFI is charged with the protection, conservation and promotion of fisheries within our functional area. Board policy is aimed at maintaining a sustainable fisheries resource through preserving the productive capacity of fish habitat by avoiding habitat loss or mitigating harmful alteration to habitat.

The site of this significant proposed development is located primarily within the upper reaches of the Figile River system with smaller sections located within the Slate catchment.
The Figile and Slate River are two of the four Barrow tributaries (Figile, Cushina, Philipstown/Daingean & Slate), draining large peatland areas in the Bog of Allen which combined are known as the Black River system. The Black River, which joins the Barrow immediately upstream of Monasterevin is by far the largest tributary of the Barrow system draining, 622km^2 and represents 21% of the entire Barrow catchment.
Salmon spawning/recruitment within the Black River is currently limited to small sections of the four tributaries referred to above. Until relatively recently, however, salmon spawning in the Black River system occurred over a far wider range, with excellent salmonid habitat throughout the four tributaries.
IFI believe that the restoration of salmon spawning recruitment throughout the Black River is integral to improving salmon stocks in the Barrow SAC.

The Barrow is a large 3000km^2 SAC system and is the sixth largest catchment in Ireland in terms of fluvial habitat accessible to salmon. Among the qualifying interests for the Barrow-Nore SAC are Atlantic Salmon and Lamprey species. Regarding Atlantic Salmon, the Barrow consistently fails to reach its Salmon Conservation Limit. The Conservation Limit (CL) is the minimum number of adult spawning fish required to maintain a healthy and sustainable stock in a river. Since 2015, the salmon population has consistently fallen below 20% of the CL and is currently 12%.
The table below shows the percentage of the salmon conservation limit achieved in the Barrow from 2011 to 2022, indicating the status of salmon stocks in the catchment. The Suir and Nore are displayed for comparison.

Table 1. Percentage of CL by River by Year

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Barrow	**40**	**41**	**29**	**29**	**17**	**18**	**18**	**17**	**16**	**15**	**14**	**14**
Nore	**129**	**140**	**153**	**121**	**91**	**60**	**70**	**77**	**80**	**84**	**84**	**68**
Suir	**116**	**112**	**117**	**83**	**80**	**68**	**79**	**100**	**102**	**102**	**91**	**60**

The reason that the Barrow numbers are so much lower than the Suir and Nore relates mainly to extensive hydro-morphological damage to the upper/mid catchment of the Barrow where significant loss and degradation of habitat occurred due to extensive widening and deepening of watercourses by the Barrow Drainage Board/Bord na Mona. Because of this damage most of the system now produces little or no salmon and other important native fish species.

Adult salmon spawn in shallow waters during the Winter months and the adult salmon that spawn in systems such as the Figile and Slate will have resided in deeper sections of the Barrow main channel prior to entering the Black River system to spawn. Conversely the progeny of the salmon that spawn in the Figile and Slate system as they grow older and larger will travel downstream to the deeper waters of the Barrow main channel, before smoltifying and migrating to sea. IFI would like to stress that the populations of salmon (and other Habitats Directive species) in these rivers/streams are an important/integral component of the salmon populations of the Barrow River SAC even though those waters are not SAC designated.

IFI have recorded salmon spawning at several locations along the Cushaling River within the area covered by this EIAR scoping. Turbine development is proposed near sections of channel that represent excellent salmonid spawning/nursery habitat.



Large salmon redd recorded on section of the Cushaling River within study area December 2024, salmon spawning recorded at other locations on Cushaling upstream and downstream of here.

In addition to salmon spawning being recorded over long sections of the Cushaling, checks throughout the Crabapple River system have highlighted excellent salmonid habitat on sections of channel there, specifically the Lugherra tributary where habitat restoration has occurred naturally. Inspections of the Lugherra highlight that it was previously subject to very significant deepening and widening but unlike most other channels here, maintenance dredging/cleaning ceased decades ago. As a result significant terrestrial woodland on the lands bordering the River has developed and the river here has recruited gravels from the bank/subsoils back to this river. IFI believe the Lugherra River highlights the potential for river/riparian habitat restoration throughout the entire study area.



Section of Lugherra River (Crabapple and Figile tributary), where habitat restoration has occurred naturally, with salmonid riffly habitat and excellent flow velocities evident.

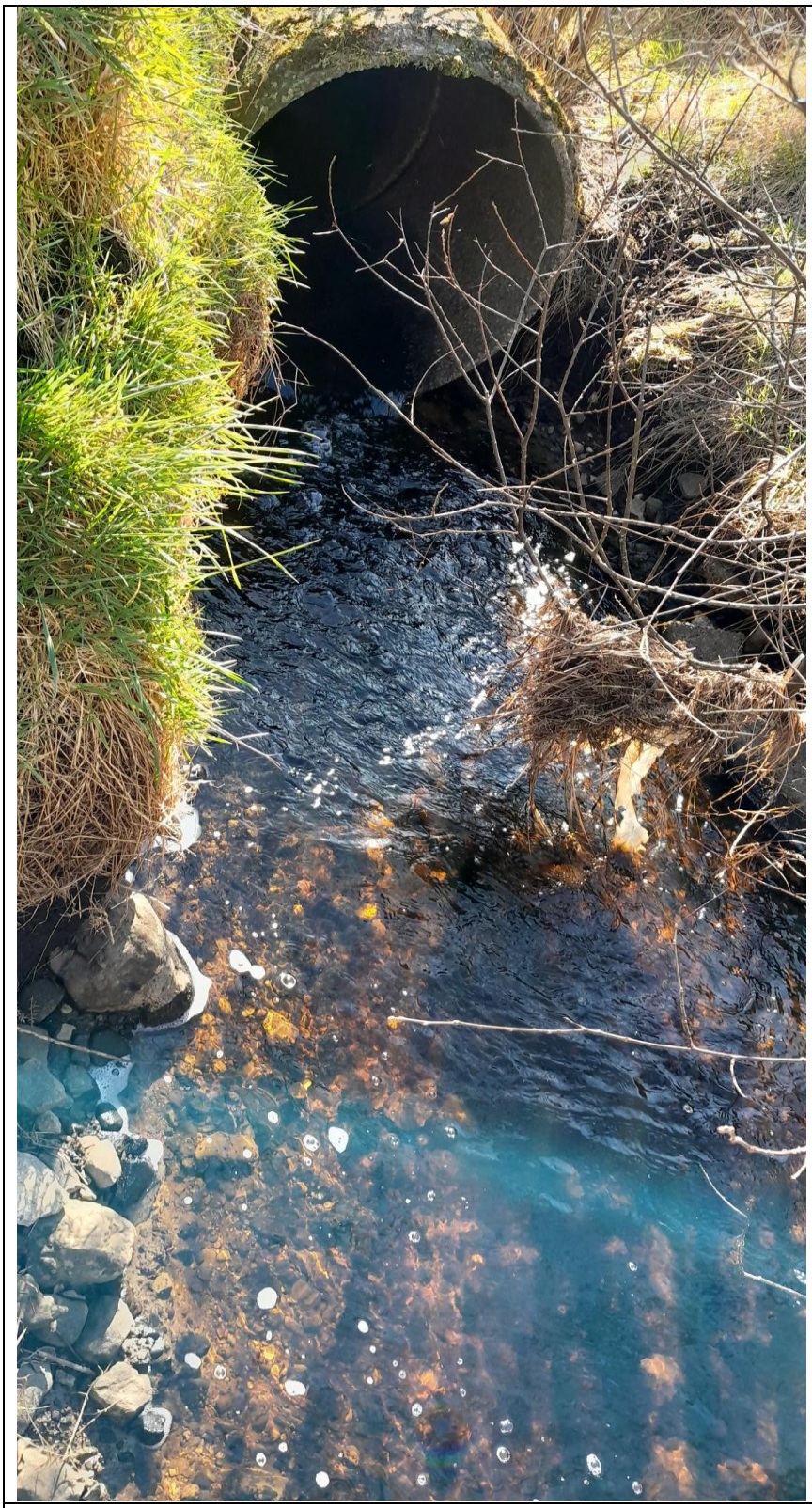
Checks by IFI throughout this study have highlighted significant loss of fisheries habitat linked to the previous land use here, where long sections were subject to hydro-morphological damage because of over-deepening and over-widening. In addition to this throughout the study area IFI inspections of watercourses here have identified multiple on-line silt traps, with several such traps in succession noted on the lower reaches of the Crabapple River and with additional silt traps in the upper reaches of this small catchment. IFI have noted multiple on-line silt traps on watercourses flowing throughout the study area. The purpose of these silt traps was to settle out the very fine peat solids associated with commercial peat harvesting here. The scale of deepening and widening on these on-line silt ponds is such that there is no realistic potential for natural habitat restoration of these important watercourses and for this to happen human intervention will be necessary.



One of several on-line silt ponds on lower reaches of Crabapple River, other large on-line silt ponds are located in the upper reaches of the Crabapple River & on watercourses throughout study area.

IFI inspections have noted significant fisheries habitat loss within the study area on the Crabapple River system where all flows from the upper reaches of the Crabapple River were diverted across Lullybeg bog to the lower reaches of the Lugherra river. The net result of this is a significant loss of fisheries habitat wetted area and deterioration of the habitat of most of the Crabapple River, with no potential for this habitat to restore naturally. IFI believe that in addition to habit restoration of the Crabapple River, restoring these waters to their original channel could provide significant flood storage.

Inspections here have also highlighted habitat loss relating to the culverting of watercourses. In many cases, the extent of habitat loss linked to culverting is relatively short linked to culverts which facilitate wide access roads and light industrial rail.
IFI checks of the Glashabaun River (Cushaling tributary) however, highlighted that almost all this tributary had been lost through culverting through the cut-over peatland, with only a few short openings along the entire channel of this watercourse. A long section of the Duke's River (Crabapple tributary) was also noted to have been piped also. See below photo of one short open section of the Glashabaun River highlighting the riffly/gravelly habitat of this watercourse.



Short open section of the Glashabaun River, approx. 250m upstream of the Cushaling river, highlighting salmonid fisheries habitat. IFI estimate over 1km of the Glashabaun River has been culverted.

IFI welcome the Bord na Mona, Biodiversity Action Plan 2016-2021 statement that "*the main aim of rehabilitation will be to re-wet former production areas as much as possible to maximize the benefits for biodiversity and carbon*".
IFI is keen to build on recent water quality improvements in the Black River, which drains 21% of the Barrow River catchment and to restore and increase populations of salmon and other native fish species over large sections of this system.

Given the scale of this project there is a unique opportunity to showcase multiple river and terrestrial habitat restoration techniques focusing upon the watercourses within the study area and to make this restoration a central pillar of the project.

The expansion of spawning by iconic species such as Atlantic Salmon within the study area is critical to Ireland achieving its requirements under the European Habitats Directive and the Water Framework Directive.
We believe that a commitment to make habitat restoration a central pillar of this project could serve as a template for future habitat restoration works necessary to fulfill Ireland's obligations under EU Nature Restoration Law at similar sites.

Inland Fisheries Ireland ask that habitat restoration which addresses the concerns raised above throughout the proposed development area is central to this wind-farm development.

Yours faithfully,

Donnachadh Byrne
Senior Fisheries Environmental Officer

Please note that any further correspondence regarding this matter should be addressed to Mr. Donnachadh Byrne, Senior Fisheries Environmental Officer, Inland Fisheries Ireland, 3044 Lake Drive, Citywest Business Campus, Dublin 24

Lakshmi Priya

From: Aisling Thompson
Sent: Wednesday 8 April 2026 14:30
To: Lakshmi Priya; Catherine Johnson; Ciarán Fitzgerald; Ellen Costello
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: IFI Cover Letter - 2025.12.03 - 250708.pdf; Ballydermot WF Constraints and Design EIAR Scoping Doc - F - 2025.12.04 - 250708.pdf

Best regards,
Ellen

Ellen Costello
Senior Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611





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From: Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>
Sent: Monday 8 December 2025 15:32
To: Aisling Thompson <athompson@mkoireland.ie>
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

You don't often get email from donnachadh.byrne@fisheriesireland.ie. Learn why this is important

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Hi Aisling,

Hope you are well.

This scoping request was passed to me. I cover the area in question.

I hope to forward on a submission in the next few days. It's more or less completed.
We have a much greater knowledge of the rivers in the study area since 2021, with salmon spawning recorded at several locations on the Cushaling River.

I wondered if it might be possible to get a better-quality map that would allow me to check the exact location of proposed infrastructure in relation to watercourses draining the site.
The map in the doc provided doesn't have the detail to allow for this.

Also the doc refers to two watercourse crossings, if possible, could you provide details, even very rough ones regarding the proposed locations of any new watercourse crossings.

Many thanks,

Donnachadh

Donnachadh Byrne
Senior Fisheries Environmental Officer
Donnachadh.Byrne@fisheriesireland.ie • +353 (0)52 6180 055 • www.fisheriesireland.ie • E91 RD25



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From: info <info@fisheriesireland.ie>
Sent: Thursday 4 December 2025 15:17
To: Noel McGloin <Noel.McGloin@fisheriesireland.ie>; Donnachadh Byrne <Donnachadh.Byrne@fisheriesireland.ie>
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon All
Below email received to Citywest Info
Kind regards
Yvonne

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:21
To: ERBD <erbd@fisheriesireland.ie>; info <info@fisheriesireland.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Inland Fisheries Ireland in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 12:19
To: 'info@fisheriesireland.ie' <info@fisheriesireland.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Meeting Minutes

Project Reference	250708 Ballydermot		
Meeting Purpose	Meeting with IFI to discuss the Proposed Project		
Meeting Time/Date	05.10.2026 @ 15:00	Location	Teams Meeting
Author(s)	CJ	Issue Date	N/A
Doc. file name	IFI Meeting Minutes – 2026.10.05 - 250708		

Attendees	**Name/Abbreviation**	**Title**
	(DB) Donnachadh Byrne	Environmental Officer for the Area
	(LOF) Lonan O'Farrell	Development Inspector for the Southeast
	(JL) Julie Larkin	BnM – Senior Project Manager
	(EH) Ellen Hilliard	BnM – Junior Project Manager
	(AP) Anna Perdue	BnM – Environmental Science Graduate
	(ME) Muriel Ennis	BNM – Planning Programme Manager
	(EMcD) Enda McDonagh	BnM – Environmental Manager
	(EC) Ellen Costello	MKO Environment
	(CJ) Catherine Johnson	MKO Environment
	(CF) Ciarán Fitzgerald)	MKO Environment
	(KOD) Kate O'Donnell	MKO Ecology
	(KB) Katy Beckett	MKO Ecology
	(BB) Bill Brazier	Triturus – Fisheries and Aquatic Ecology Surveyors
	(RM) Ross Macklin	Triturus – Fisheries and Aquatic Ecology Surveyor

Item	Description
1.	Introductions
2.	MKO ENV, ECO and Triturus Presentation on Ballydermot Wind Farm Project.
3.	• DB – queried BB if the results of the electrofishing could be passed on. Acknowledged this is done through Section 14 but administrative challenges on IFI slides make it difficult ○ BB confirmed

4.	• DB – outlined that the key points from an IFI perspective is that the river has been damaged from the low gradient and underlying geology following peat extraction. Has been looking to naturally restore but this is very limited and why IFI are of the opinion that some riparian restoration should be part of the actual project
	  ○ Noted that there is a double combination of the habitat and that there will be water quality issues.
	  ○ DB noted that intervention will be required to restore the water quality
	• DB queried if any focused areas on where this could be done. Suggests could start with small areas including areas around where bridges will be built etc.
	  ○ LOF agreed and queried when this was flagged
	• DB outlined that the scale of site is the main note flagging re suitability for riparian works. There are large areas of watercourses and areas under state ownership that could be done with no negative impacts on adjoining landowners
	• EMcD responded that engagement has occurred with IFI previously and is ongoing on restoration (noting the barrier programme). EMcD has noted that there are sites BnM are looking into with IFI under the Memorandum of Understanding (MOU)to explore future restoration projects
	  ○ Noted timing doesn't suit for this project due to requirements of the scale of restoration being proposed
	  ○ BnM is working on potential river restoration opportunities in the background that will form part of MOU, but timings not aligned with trajectory of the Proposed Project
	• JL confirmed that BnM are happy to carry out restoration outside of this application, but they will be discussing it as a separate discussion with IFI and BnM and happy to continue working with IFI.
	• CF confirmed and highlighted that this application will not constraint any future projects with our design, the culvert and crossing design proposed looks to consider the potential for future restoration opportunities through the use of minimal crossings, oversized embedded culverts to avoid fish passage barriers and the preferred use of clear span structures where feasible.
	• EC noted that the purpose of the EIAR and NIS is to establish the receiving environment at the Project Site and assess the potential for the Proposed Project itself to impact this baseline.

Item	Description
	○ The Proposed Project has factored direct mitigation, offsetting and enhancement within the context of the Proposed Project itself. The offsetting and enhancement areas presented focus on flora and fauna as these are the aspects of the environment that the potential for pre-mitigation impacts to arise from the Proposed Project. For example, we are directly replacing habitat that is being lost because of the Proposed Project. River restoration, however important, is an aspect of restoration of the bog itself and not identified as a direct offsetting requirement for impacts arising from the Proposed Project. ▪ Mitigation by design has been employed with regards set backs from water features, culvert design and appropriate mitigation measures water quality alongside the future proofing for potential restoration i.e crossing methodologies. ○ Noted that the development of the Proposed Project isn't the only project or activity within the site; the requirements of the IPC licence are active and the potential of the site for river restoration is acknowledged. The Proposed Project consists of a wind farm and grid connection, with the mitigating and offsetting measures directly relating to the project itself. • DB acknowledged the points raised by EC and reaffirmed that the IFI perspective is the Proposed Project does not consolidate an existing environmental pressure and constrain IFI into the future ○ Ideal scenario is that the river can start to restore itself and limit intervention, and existing pressures are not increased due to the Proposed Project and IFI are not forced to step in and restore in the long-term ○ Noted that there are water quality issues on the Project Site, but acknowledged these will likely be present for the long-term and that river restoration and water quality can be fixed side by side but not necessarily together

Lakshmi Priya

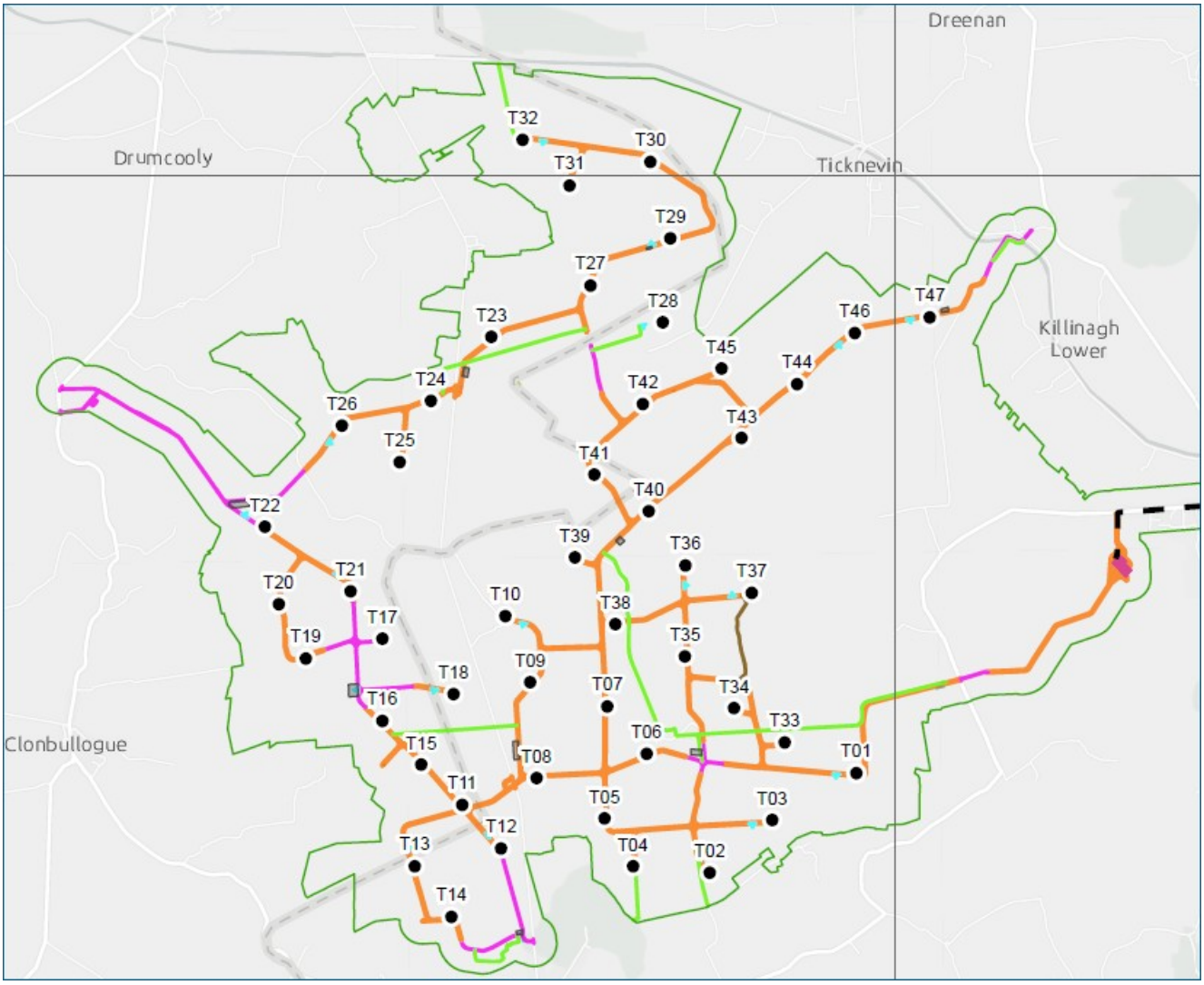
From: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>
Sent: Friday 5 December 2025 15:12
To: Aisling Thompson
Cc: Ellen Costello; Catherine Johnson; Ciarán Fitzgerald; Planning
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Hi Aisling,

I do not see it in the scoping report (but if I've missed the reference, please point it out) but can MKO please provide a table with the approximate coordinates for the 47 x wind turbines proposed? In WGS-84 format preferably but please indicate what coordinate system is utilised if different. A .kml file with the coordinates for Google Earth would also be acceptable.



Additionally, if you could provide an indicative ground level for each turbine base (above ordnance datum) and also the proposed height for each turbine (above ground level), this would greatly assist the Authority's review of this proposal.

Regards,

Christophe

Christophe O'Brien
Aerodromes Inspector
M: +353 (0) 86 33 22022|
E: obrienc@iaa.ie | www.iaa.ie
The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449

ÚDARÁS EITLÍOCHTA NA hÉIREANN
IRISH AVIATION AUTHORITY

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 16:43
To: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Planning <planning@iaa.ie>
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good evening, Christophe,

Thank you very much for your response and informing me of the Proposed Development's close proximity to Clonbullogue Airfield, home of the Irish Parachute Club. I have now sent the scoping request to their email for the attention of the Irish Parachute Club and their members.

We welcome the responses of IAA in due course.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>
Sent: Thursday 4 December 2025 16:31
To: Aisling Thompson <athompson@mkoireland.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Planning <planning@iaa.ie>
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Good evening Aisling,

Thank you for your email. Without reviewing the proposal in detail, I note that this is a very significant wind farm development proposal.

It is also within close proximity to Clonbullogue Airfield, home of the Irish Parachute Club and likely within the parachuting zone as identified in Ireland's Aeronautical Information Publication, ENR 5.5: Aerial sporting and recreational activities which has a radius of 5 nautical miles centred on the aerodrome.

Please forward this scoping request and consultation directly to: info@skydive.ie for the attention of the Irish Parachute Club and their members.

Post: Irish Parachute Club Ltd
The Airfield
Clonbullogue
Edenderry
Co. Offaly
Phone:1850 260 600

The Authority will continue its review of this scoping document and will revert with comments in due course but it is most urgent that you contact the nationally licensed Clonbullogue Airfield and the Irish Parachute Club to ascertain their views and observations.

Regards,

Christophe

Christophe O'Brien
Aerodromes Inspector
M: +353 (0) 86 33 22022|
E: obrienc@iaa.ie | www.iaa.ie
The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449

ÚDARÁS EITLÍOCHTA NA hÉIREANN
IRISH AVIATION AUTHORITY

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:51
To: Planning <planning@iaa.ie>
Cc: Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>; Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Mr Christoph O'Brien,

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate

this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

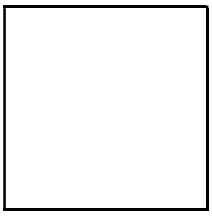
Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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Lakshmi Priya

From: Irish Peatland Conservation Council <bogs@ipcc.ie>
Sent: Tuesday 13 January 2026 12:33
To: Aisling Thompson
Subject: Re: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Hi Aisling,

We plan on submitting back to you next week, we have been busy here at the Natue Centre and have not had a chance to put our thoughts down on paper just yet!

Thank you for allowing IPCC to make comments.

Kindest Regards

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51 V293

045 860133
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www.ipcc.ie
CHY6829
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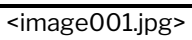
> On 13 Jan 2026, at 12:30, Aisling Thompson <athompson@mkoireland.ie> wrote:
>
> Good afternoon,
>
> With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Ballydermot Wind Farm Development. If so, can you please get back to me at your earliest convenience.
>
> Thank you.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611



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From: Aisling Thompson
Sent: Thursday 4 December 2025 14:52
To: 'bogs@ipcc.ie' <bogs@ipcc.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

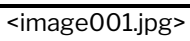
The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind

energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist



MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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Lakshmi Priya

From: Irish Peatland Conservation Council <bogs@ipcc.ie>
Sent: Monday 26 January 2026 15:49
To: Aisling Thompson
Subject: Re: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Ballydermot WF BnM Contraints Scoping 2026.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Aisling,

Please see attached comments from IPCC regarding the Ballydermot Scoping.

Please confirm receipt for our records.

Kindest Regards

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
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> On 4 Dec 2025, at 14:51, Aisling Thompson <athompson@mkoireland.ie> wrote:
>
> Dear Sir/Madam,
>
> MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated

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Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist

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<image001.jpg>

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IRISH PEATLAND CONSERVATION COUNCIL

COMHAIRLE CHAOMHNAITHE PHORTAIGH NA hÉIREANN

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Liolach Mór, Rath Iomgáin, Co. Chill Dara, Éire, R51 V293
Tel/*Teil*: +353-(0)45-860133
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web/*idirlíon*: www.ipcc.ie

Bord na Móna Powergen
Main Street
Newbridge
Co. Kildare

26th January 2026

RE:Proposed Ballydermot Windfarm, Co. Kildare, Constraints Scoping 2026

Dear Powergen/Ballydermot Windfarm Project Team,

The Bog of Allen was originally ~115,000ha and blanketed much of the east of the Republic. The study area for the proposed Ballydermot Wind Farm was once a large complex of raised bog and associated habitats within the Bog of Allen. Its decimation has had massive effects on the local indigenous wildlife and contributed to biodiversity decline nationally. The blatant disregard for the natural landscape through intensive extraction of peat for energy and horticulture has contributed to much of the biodiversity and ecological losses that Ireland now faces, made evident within the last National Parks & Wildlife Service (NPWS) report to the EU Commission "The Status of EU Protected Habitats and Species in Ireland 2025"[1]. Raised Bog (active) and Degraded Raised Bog, which are already rare and specialised habitats within Europe, have an overall status of "Bad" in Ireland with their "Range" also "Bad" and unchanged since 2019. It is of utmost concern that the raised bog within the Lullymore Bog Complex, now that it is out of production, be fully restored and special attention given to help the return of displaced and lost species. IPCC are making comments on the proposed wind farm, with the aim of protecting important areas and improving the ecological integrity of peatland in Counties Kildare and Offaly, but which has wide ranging national implications in regards to biodiversity recovery.

Concerns

IPCC's concern lies with the protection of the numerous raised bog remnants and local biodiversity hotspots of the greater Lullymore Bog and surrounding area. Following is an inventory of sites which deserve rigorous protection from the construction and operation of a wind farm.

Lodge Bog Nature Reserve - Co. Kildare (see Map 1)

This is a raised bog nature reserve and is one of the very few last near intact examples of raised bog remnants within the entire Ballydermot Works Complex. It covers an area of 35ha and while it was drained, it was never brought in to production. IPCC manage this site with the financial and manual support of our members and volunteers, who IPCC represent. 200 dams have been built across the 5km of drains and the water levels are manually monitored year round using the 118 piezometers installed along transects. The aim is to reverse the effects of drainage and the impact of industrial peat extraction on the bog margins.

A boardwalk at the most northern edge of Lodge Bog allows for schools and tourists to enjoy the vistas of Lodge Bog while learning about peatland habitats and their importance to future generations. Tourists arrive daily during the summer season and IPCC facilitates the school visits. The presence of turbines would be another threat to the views in conjunction with dust and blasting from the Hill of Allen quarry and mechanical domestic peat harvesting in the surrounding cutovers.

As breeding Curlew are extremely rare in Ireland and are at risk of extinction, IPCC could not support the construction of a wind farm which may upset migratory routes or supporting habitat for these birds. The installation of large turbines may have unknown consequences on their behaviour and breeding success.
Other species of note on Lodge Bog is the Large Heath Butterfly, actively monitored by IPCC with the National Biodiversity Centre. This species is described as *Vulnerable* within the Irish Red Data List, attributed to the fact that the Large Heath is a peatland specialist and its range has become severely limited and fragmented.
Lodge Bog and the impacts from renewable energy has to be excluded from the proposed study area.

Charity No/*Uimhir Carthanacht*: CHY6829 Registered in Ireland No/*Uimhir Cláraithe in Éirinn*: 116156 Registered Office/*Oifig Cláraithe*: Lullymore, Rathangan, Co. Kildare, R51 V293, Ireland
Governance Code Statement of Compliance: IPCC confirm that our organisation complies with The Governance Code for the Community, Voluntary and Charitable Sector in Ireland.

Company Secretary/*Rúnaí Comhlacht*: Rachel Kavanagh
Directors/*Stiúrthóirí*: Martin Kelly, Catherine O'Connell, Rachel Kavanagh, Miriam Mooney, Kate Macnamara, Seán Ó Fearghail,

Patrons/*Pátrúnaí*: Pauline Bewick, Don Conroy, HRH Princess Irene of the Netherlands,
Eanna Ní Lamhna, Matthijs Schouten, His Excellency Mr Peter Kok Netherlands Ambassador to Ireland

Lullymore West Nature Reserve - Co. Kildare (see Map 1)

Lullymore West (4.5ha) is a species rich nature reserve consisting of calcareous and acid grassland, deciduous woodland and cutaway raised bog. The IPCC have owned and managed the site since 2005. The diversity of habitats within the small area adds to the importance of the site as well as the established population of Annex II Priority Species Marsh Fritillary Butterfly, which are monitored throughout the year. The site is actively managed with ongoing scrub removal, grazing trials, a weekly butterfly survey(24 species recorded). Freshwater invertebrate monitoring is also ongoing. Previous works have included drain blocking and tree removal. Volunteers are an important part of IPCC's site management work and Lullymore West provides a backdrop for community engagement. This nature reserve is open to the public and visited daily by locals and tourists (national and international) as a natural amenity. The specialised grassland habitats display rare orchids and the wetland refugia provides for many species of dragonfly and other invertebrates.

The presence of the Annex I Marsh Fritillary highlights the importance of this site - for monitoring and research, community engagement, biodiversity protection and international tourism. IPCC could not support the development of a wind farm which may affect the ecological integrity and future potential of Lullymore West.

Lullybeg Nature Reserve - Co Kildare (see Map 1)

Lullybeg is a 10ha Bord na Móna rehabilitated cutaway, managed since 2010 by Butterfly Conservation Ireland. It is listed in the Bord na Móna Biodiversity Action Plan 2016-2021. This is an important conservation location as it is home to a population of Marsh Fritillary, the only protected species of butterfly in Ireland. The rewards of the conservation management and scrub removal are evident as the already impressive list of flora and flora recorded on site are ever increasing.

Close by to Lullybeg there is a raised bog remnant which needs to be included in the restoration works (N662022586). This could be supported by the species rich developing flooded cutaway (N6893825389) and calcareous grassland habitats (N6795523611), which, with ecological management and maintenance of access routes linking the areas would add to the diversity of the site.

Lullybeg is another important site within a network of nature reserves regarding the proposed study area that may suffer ecologically with the development and construction of a wind farm. This site needs to be excluded from renewable energy development and the associated impacts.

Lodge Bog Wetlands - Co. Kildare (see Map 1)

This is a Bord na Móna (~35ha) site that has come out of production. Rehabilitation has been underway since 2014/15. The site has been included in the Peatlands and Climate Action Scheme and is supporting habitat for Curlew and a nesting ground for Lapwing (Red Listed - The Birds of Conservation Concern in Ireland). The rehabilitating cutaway is developing as an important biodiversity hotspot with many wetland bird species returning to use the site and Bord na Móna have also conducted *Sphagnum* restoration trials for the potential use across other sites.

Lodge Bog Wetlands, since coming out of production is now supporting a population of breeding Lapwing and is showing promising returns of wintering wildfowl. The construction and presence of turbines may upset the future potential for biodiversity for this site and would also affect Lodge Bog (IPCC). This site should be excluded from the proposed study area.

Lullymore Wetlands - Co. Kildare (see Map 1)

This is a 100ha rehabilitated area in Bord na Móna ownership developing into fen habitat. A portion of the site is leased by the Lullymore Heritage & Discovery Park and has been developed as a wetland walk which supports a large amount of annual national and international tourists. There is a population of "Red" listed Lapwing using the area and Bord na Móna have liaised with BirdWatch Ireland Kildare in regards to the protection and management of the birds. In 2016 - in conjuction with UCD, a green-house gas monitoring station was installed to research the emissions from cutaway habitats near birch woodland. This site needs to be excluded from the proposed study area and it needs to be ensured that it suffers no impacts from the wind farm.

Ballysooghan North - Co. Kildare (see Map 1)

This raised bog is listed in The Bog of Allen Heritage Survey 2005 (Hurley, C. 2005)[6] which described it as actively forming peat with 75% *Sphagnum* cover. IPCC were due to put this site forward to the NPWS for inclusion within the Natural Heritage Area Raised Bog Network Review as it had conservation value and deserved designation. The IPCC Sites Database records this site as once being the only site within Co. Kildare with *Sphagnum Pulchrum* present. Bord na Móna had also ear-marked this site for biodiversity - yet in 2014 it was discovered that the site had been ditched with drains 9m apart which striated the full length of the remnant. A complaint was made to the Local Authority, NPWS and the Environmental Protection Agency. Bord na Móna apologised for the mistake and accelerated rehabilitation by blocking the drains and bringing the site formally within the Biodiversity Action Plan 2016-2021.

The potential for this damaged but regenerating raised bog is high in regards to protecting the remaining remnants of the greater Lullymore Bog Complex. This site should be excluded from the proposed study area.

Aghameelick - Co. Offaly (see Map 1)

This is an eastern raised bog remnant of Clonsast Bog (which is now mostly industrial cutaway) which was described within the Bog of Allen Heritage Survey 2005 as having up to 95% *Sphagnum* cover and a good hummock - hollow topography. The 90ha site is of regional importance due to the rarity of raised bog in Leinster. The IPCC Sites Database lists the Irish Hare (Annex V E.U. Habitats and Species Directive) as utilising this site. This site may be affected by turbines installed within the proposed study area and needs to be screened hydrologically and ecologically. The species present within the proposed study area or Aghameelick Bog may use migratory routes between them and the presence or construction of turbines would disturb them.

The Long Derries SAC (Sitecode:000925) - Co. Offaly (see Map 1)
This 30.37ha stretch of low esker ridge mixed with loam and peat soils is designated under the E.U. Habitats Directive as it contains Orchid-rich Calcareous Grassland as a qualifying interest. Within the NPWS Site Synopsis the Nightjar (Annex I of the E.U. Birds Directive) is listed as breeding on site and the partridge, a Red-Listed bird in Ireland, is also present contributing to the high conservation importance of The Long Derries SAC. Satisfactory setback distance from any proposed turbine must be provided.

Mouds Bog SAC (Sitecode:002331) - Co. Kildare (see Map 1)
This raised bog Special Area of Conservation has been described by the NPWS as of regional and national importance due to the low amount of raised bog in Co. Kildare. There is an assemblage of flora that is indicative of raised bog habitat such as *Sphagnum spp.,* Heather, Bog Rosemary and Bog Asphodel. The bird wildlife increases the conservation value with Kestrel, Skylark, Meadow Pipit and Red Grouse being present, the latter two being "Red" listed on the Birds of Conservation in Concern in Ireland. This site is to avail of restoration measures in 2022, funded by the €5m announced for peatland restoration on non-Bord na Móna lands. Bord na Móna is to carry out the restoration works. This site needs satisfactory assurances that it will not be affected by development of renewable energy infrastructure and associated impacts on species and hydrology.

Pollardstown Fen SAC (Sitecode: 396) - Co. Kildare (see Map 1)
This is the largest spring-fed fen in Ireland and is internationally important due to the rare species present which depend on the unique habitat. Three Annex I Priority Habitats are listed for Pollardstown Fen - Alkaline Fen, Calcareous Fen with *Cladium mariscus* and Petrifying Springs with tufa formation. The fen is hydrologically dependent on the calcium rich waters rising primarily at the margins. There are a number of rare and protected species described in the IPCC Sites Database such as 3 species of Whorl Snail (the only site in Europe to support all three when the site was designated), Marsh Fritillary, Otter, Golden Plover, Marsh Harrier and Greenland White-Fronted Geese. Pollardstown Fen was also included in the "Dragonfly Ireland Project" and 12 species of Dragonflies were recorded. It was also discovered than this fen is the only known site within Co. Kildare to support the Blue-Tip dragonfly. The established boardwalk and walking route around the fen allows the local community and visitors to enjoy the specialised range of flora and fauna. This site needs adequate setback distances and the potential for detrimental hydrological effects from construction of any turbines within a sensible range needs to be examined closely.

Umeras Peatland Park (See Map 1)
Umeras Bog was in industrial peat production since the mid 1970s and when Bord na Móna announced the cessation of peat extraction the local community, under the Umeras Community Development CLG, developed the concept of Umeras Peatland Park. This site has also received enhanced rehabilitation and restoration under the Peatlands and Climate Action Scheme. This was included as the peat depths were still considered deep at 2.5m over much of the site. The bog is already important for biodiversity as reported in the "Umeras Bog Biodiversity Study Report 19-08-2022" which lists the habitats present and the species recorded during the commissioned surveys. Important to species to note are breeding Ringed Plover and Lapwing. Hen Harrier also utilise the site. As the bog stabilises after the rehabilitation works it will be become even more imperative that renewable development does not hinder the recovery of carbon storage ability, water quality and biodiversity. Turbines could impact on the migration routes and nocturnal movements of birds and this needs to be investigated.

Bord na Móna Biodiversity Action Plan 2016-2021
Please see Map 2 for sites listed within Bord na Móna's Biodiversity Action Plan as already receiving restoration or rehabilitation works. These sites need to be protected from the proposed infrastructure and associated impacts.

Habitats of Importance
Much of the Ballydermot/Lullymore Complex has not been under production for a long time, before the cessation of peat extraction by Bord na Móna and have naturally regenerated. IPCC see that embryonic fen, wet and dry grasslands, raised bog and wet and dry heath habitats as having long term biodiversity value. These should be protected from any proposed development.

Wetland Surveys Ireland
Wetland Surveys Ireland, on behalf of Offaly and Kildare County Councils, have earmarked a number of wetland sites for an ecological survey:-Rathvilla Ponds (WMI_OF213, raised bog, cutover bog, fen), Ballykillen Cutover (WMI_OF208, cutover bog, bog woodland), Cloncert Kilcumber (WMI_OF212, cutover bog, fen), Ballydermot-Clonbrown (WMI_OF215, raised bog, cutover bog, fen), Cushaling South East Bog (WMI_OF74). These sites need to be ecologically surveyed the data recorded included within the respective County Wetland Survey. It is not possible to ascertain the possible detrimental affect that a wind energy development may have if a sites ecological importance has not been described.

Cushaling East Wet Heath (WMI_KE106, wet heath, cutover bog), Cushaling River Valley (WMI_KE217), Ballysooghan (WMI_OF48), Ballydermot (WMI_OF215), Rathmore Bog (WMI_KE51, raised bog, cutover bog), Ballyteige South Bog (WMI_KE102), Allenwood South Bog (WMI_KE100, raised bog), Clonavoe Bog (WMI_OF85, raised bog, cutover bog) and Cloncreen Ballrath Cutover Complex (WMI_OF214) have been described as having moderate/high local conservation value or are nationally important. These sites need adequate setback distances so as not to disturb the ecological integrity of the habitats present.

R414
IPCC operates from the Bog of Allen Nature Centre where we educate schools groups and members of the public in peatland ecology and the importance of a natural environment. At the centre we use the wildlife gardens and peatland museum as educational tools. The only route for coaches and visitors to arrive at the nature centre or the local nature reserves (Lodge Bog & Lullymore West) is along

the R414, which is a small narrow road with peatland on both sides. Large vehicles have difficulty traversing the route and any large construction operation (transport of materials/cable laying) will cause problems. If this road is to be closed for any amount of time The Bog of Allen Nature Centre will not be able to operate and lose the main source of operational finance. Construction sites may also be an issue for IPCC if when we bring schools to the nature reserves we have to bring them through a building site. In previous wind farm applications this was highlighted by IPCC but never addressed.

Curlew Conservation

The indigenous Curlew population of Ireland has reduced in number by 96% (Lewis et al, 2019) and as such are listed "Red" within Birds of Conservation Concern in Ireland (NPWS, 2019). There is currently a national effort to bring this species back from the verge of extinction and BirdWatch Ireland Kildare, NPWS and IPCC have been working together to increase measures on Lodge Bog to improve nesting success.

Lodge Bog has provided refuge to 3 Curlew (*Numenius arquata),* consisting of a native breeding pair and a single individual. Curlew are monogamous and show high site fidelity and preference, always returning to their home breeding ground. Curlew are long term residents of Lodge Bog, first officially identified in a baseline faunal survey carried out in 2005 by Michael O'Meara (Hurley, 2005).

A study in 2012 sponsored by Kildare County Council found evidence of breeding and that the 3 Adults have a high preference for Lodge Bog North (Ó Corcora, 2012)[2]. Since 2015 IPCC have formally monitored the arrival and behaviour of the Curlew when they return to Lodge Bog in March and stay until July.

In 2022 one of the Curlew utilising Lodge was ringed and electronically tagged and was recorded numerous times at 53.277531,-6.8979829 possibly foraging. Since then a development without planning permission has destroyed the foraging area and the County Kildare Planning Department refused an application for retention with the impact to the Curlew being a main component (Planning Ref 22/390). This loss of foraging habitat also needs to be taken into account when assessing the impacts of the proposed wind farm and infrastructure as this was evidently one of the last suitable foraging habitats for Curlew in the County and Country.

IPCC have not recorded any sightings of Curlew on Lodge Bog in 2025/2026 but are aware that the Curlew which was was tagged/ringed in 2022 is still utilising the Lullymore area as it has been recorded in Ballytiegue (near Allenwood) and in the Cushaling (Offaly/Kildare) area with at least 9 other Curlew. The ringed Curlew seems to be overwintering in Ballytiegue but the breeding grounds are not known. This needs to be ascertained before any more disturbance or habitat loss which would affect these native, near extinct birds occurs.

County Kildare Development Plan

Sensitivity to Development

The County Kildare Development Plan 2023-2029 (Chapter 13.3.1 - Landscape, Recreation & Amenity) describes the Ballydermot/Lullymore Bog Complex as being within "Class 3 High Sensitivity" to wind energy development and within "Areas with reduced capacity to accommodate uses without significant effects on the appearance or character of the landscape having regard to prevalent sensitivity factors". This strengthens the importance of this area and highlights that it is unique. It would be unacceptable to lose this uniqueness, in biodiversity and climate change mitigation terms for a short term renewable energy development where the affects can not be reversed.

Action B1 A31

Chapter 12. Biodiversity and Green Infrastructure states that the County Council support the delineation of an "interconnected Bog of Allen Nature Reserve, Special Amenity Area or National Peatlands Park" and expresses interest in working with stakeholders such as other Local Authorities and Bord na Móna to make this a reality. The IPCC are fully supportive and work with the National Peatlands Park Group which successfully campaigned for this action to be included in the County Development Plan. The peatlands of North East Kildare represent a unique opportunity with the last remaining large scale land mass of potential continuous raised bog in Europe. An area of this scale, if given the opportunity will go a long way in reversing the biodiversity emergency. The proposal for a peatlands park aligns directly with the National Parks and Wildlife Service's position that biodiversity recovery must occur at scale, across whole landscapes rather than in isolated sites. NPWS has repeatedly emphasised through its strategic planning and its role in the National Biodiversity Action Plan that reversing habitat decline requires large, coordinated restoration programmes capable of delivering ecosystem-level change. The Ballydermot/Lullymore Complex—one of the largest peatland complexes in the country—represents exactly the kind of landscape where this approach is both necessary and achievable. A Peatlands Park would provide the governance structure, cross-county coordination, and long-term management framework needed to deliver restoration at the scale NPWS identifies as essential, while also supporting climate action, biodiversity recovery, water quality and community engagement across Kildare. There is a draft feasibility study available for more information.
https://www.nationalpeatlandspark.com/_files/ugd/e8c0f5_31d00f6efcc54d029d1a4713110f7e56.pdf

County Kildare Renewable Energy

County Kildare's wind energy target for 2030 is 107MW with 53MW already permitted. Timahoe Solar Farm is 108MW. IPCC question the necessity of the proposal for a renewable energy development in a Class 3 High Sensitivity area of the County when the targets are already met. There are other areas more suitable for renewable development. The Ballydermot/Lullymore Complex has many habitats which have naturally regenerated, been rehabilitated or as a part of Bord na Móna's extractive licence, have to be rehabilitated now industrial extraction has finished.

Drainage
It is important to note that if a development requires ongoing hydrological management to maintain the infrastructure then the landscape would better be better suited providing refugia for biodiversity, long term carbon storage and freshwater quality management. The lifespan of a renewable energy project and the carbon offset does not compare to a peatland landscape which will sequester for millenia. Installing infrastructure which will permanently alter the hydrological landscape will not allow the species to return which have been displaced and made locally extinct from the already intensive historical industrial peat extraction. The Ballydermot/Lullymore Complex is one of the only landscapes left where large scale embryonic wetland habitats can be created, rehabilitated and restored, which already has nationally important species monitoring and management ongoing and has a community which has been looking forward to the tonal shift away from an industrial landscape to one which provides intrinsic biodiversity protection, improved water quality and climate change mitigation without the continual pressures of renewable energy. Ireland is conducting self-sabotage by installing infrastructure which is inhibiting the intrinsic rehabilitation of some of the rarest habitats in Europe.

Peat Depth
All deep peats including raised bog remnants should be protected from drainage and infrastructure. These are the areas where there will be a repository of the original flora, seed bank and micro-biome which may be necessary for successful natural and native recolonisation. A map of the peat depth needs to be provided.

Peatlands and Climate Action Scheme
IPCC question the compatability of the Peatlands Climate Action Scheme and large renewable energy developments. The IPCC are very supportive PCAS as it utilises advanced restoration techniques to go beyond the basic legal requirements to stabilise emissions to air and water as per Bord na Móna's integrated pollution and prevention licence issued by the Environmental Protection Agency. If these advanced expensive techniques are utilised for carbon sequestration, biodiversity recovery and water quality improvements then what are the impacts of installing large renewable energy developments in close proximity to them. Will this impact the return of species like waders? The advanced techniques should be used across the whole of Bord na Móna's land-bank for real biodiversity and ecological re-instatement. The €108 million provided for this scheme and advanced restoration techniques came from the European Union Resilience and Recovery Facility and should not be used to promote commercial renewable energy developments.

Fragmentation
The new roads, hardstands and infrastructure will fragment the site further diminishing the potential for biodiversity recovery. There will be construction works and ongoing hydrological alterations to facilitate access ways and development which will all accumulate to degrade the potential for meaningful biodiversity recovery and long term carbon sequestration. The benefit of having a landscape of scale for biodiversity recovery is less edge effect. By increasing the fragmentation the edge effect is also being increased which is detrimental to habitat management and conservation. This detrimental to the national attempt at reversing the biodiversity emergency.

The Peatlands of County Kildare
County Kildare once held 24,317ha of peatlands but 88% has been lost or man modified (Peatlands and Climate Change Action Plan, IPCC, 2021). The IPCC question whether peatlands are adequately protected within or outside designated sites. Pollardstown Fen was world famous because it was the only site in Europe which supported 3 species of rare whorl snail. 2 of these can now be considered extinct from the area (NPWS, 2026). Marsh Fritillary can no longer be found at Ballynafagh Lake SAC (Jesmond Harding, Butterfly Conservation Ireland, Pers. Com, 2026). These losses highlight in-action. IPCC supported the Kildare County Council in refusing a planning application to open a new turbary area to relocate turf-cutters from a protected site as it could have had impacts to a designated site and extending peat extraction to a new site when the county was meant to be moving away from this activity. Installing renewable energy in a peatland landscape is still miss-representing the importance a peatland of this scale has in terms of biodiversity recovery, carbon storage and water quality.

Conclusion
The Irish Peatland Conservation Council recognises the essential role of renewable energy in Ireland's transition away from fossil fuels. Our concern is not with wind energy itself, but with ensuring that its development does not repeat the environmental mistakes of the past. The Ballydermot/Lullymore Bog Complex represents one of the last opportunities in Ireland and indeed in Europe to restore a functioning peatland landscape at meaningful scale. After decades of industrial extraction, the remaining fragments of raised bog, fen, wetland, grassland and cutaway habitats are finally beginning to recover. This recovery is fragile, hard-won, and irreplaceable.

A wind farm spanning these conservation areas risks undermining the very ecological potential that communities, NGOs, Bord na Móna, and state agencies have worked to rehabilitate. The construction of turbines, roads and associated infrastructure would introduce new fragmentation, hydrological disruption and disturbance to species already under severe national pressure, including Curlew, Lapwing, Marsh Fritillary and other peatland specialists. At a time when Ireland is striving to reverse biodiversity decline, it would be counterproductive to impose further pressures on one of the country's most important peatland landscapes, particularly when Kildare's renewable energy targets are already met through less sensitive developments.

There is now a unique opportunity to shift the region from an industrial past to a future defined by ecological restoration, climate resilience, community amenity and eco-tourism. The concept of a National Peatlands Park, supported in the County Development Plan and aligned with NPWS's landscape-scale restoration vision, offers a long-term, sustainable alternative that delivers climate action without sacrificing biodiversity. The Lullymore Bog Complex, with its mineral island and mosaic of regenerating peatland habitats, is ideally placed to become a flagship example of Ireland's commitment to nature recovery.

The IPCC is not opposed to sustainable energy development, but the size, location and design of any proposal must respect the environmental sensitivities of this landscape. Without meaningful engagement, genuine conservation gains, and careful avoidance of the most ecologically valuable areas, a wind farm here risks repeating the fragmentation that has already cost Ireland so much of its natural heritage. The remaining peatland remnants deserve protection, not additional pressure. With thoughtful planning, the region can instead become a model of biodiversity restoration, community benefit and climate-positive land use, an outcome far more enduring than the short-term footprint of a wind farm.

Your Sincerely,



Tristram Whyte - Freshwater Biology B.Sc(hons) - IPCC - Conservation Policy & Fundraising Officer

References:-

[1] The Status of EU Protected Habitats and Species in Ireland 2025, National Parks & Wildlife Service, 2025.

[2] Distribution and Breeding Success of Curlew on Lodge Bog, Co. Kildare, Irish Peatland Conservation Council ,Tadhg Ó Corcora MSc, 2016.

[3] Monitoring of three Annex II species of Vertigo snail on Irish sites (2022–2024), NPWS, National Parks & Wildlife Service 2026

[4] Irish Wetland Bird Survey: Waterbird Status and Distribution 2009/10-2015/16, National Parks & Wildlife Service, 2019

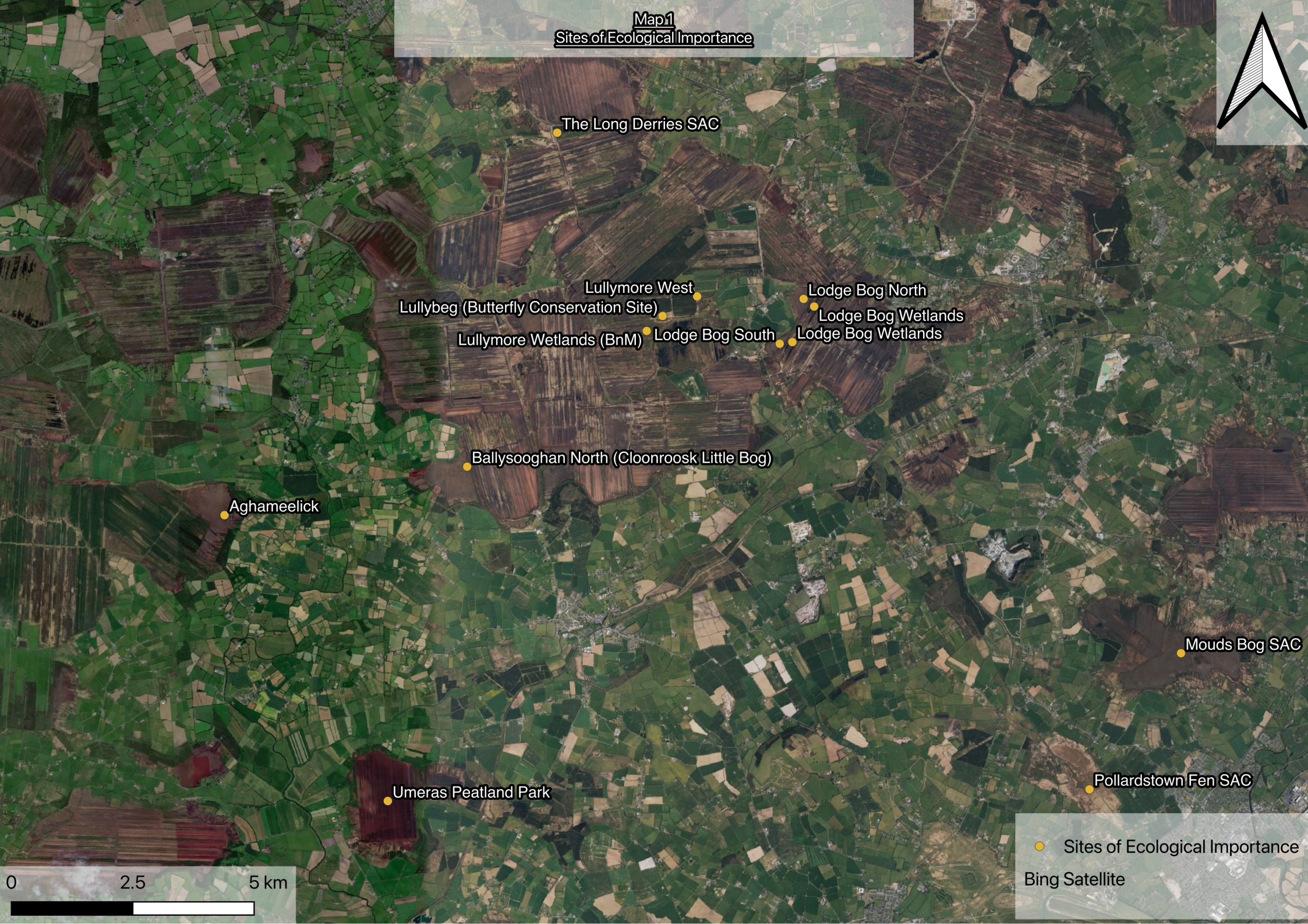
[5] Peatlands and Climate Change Action Plan 2030, O'Connell, C.A., Madigan, N., Whyte, T. & Farrell, P., 2021, Irish Peatland Conservation Council.

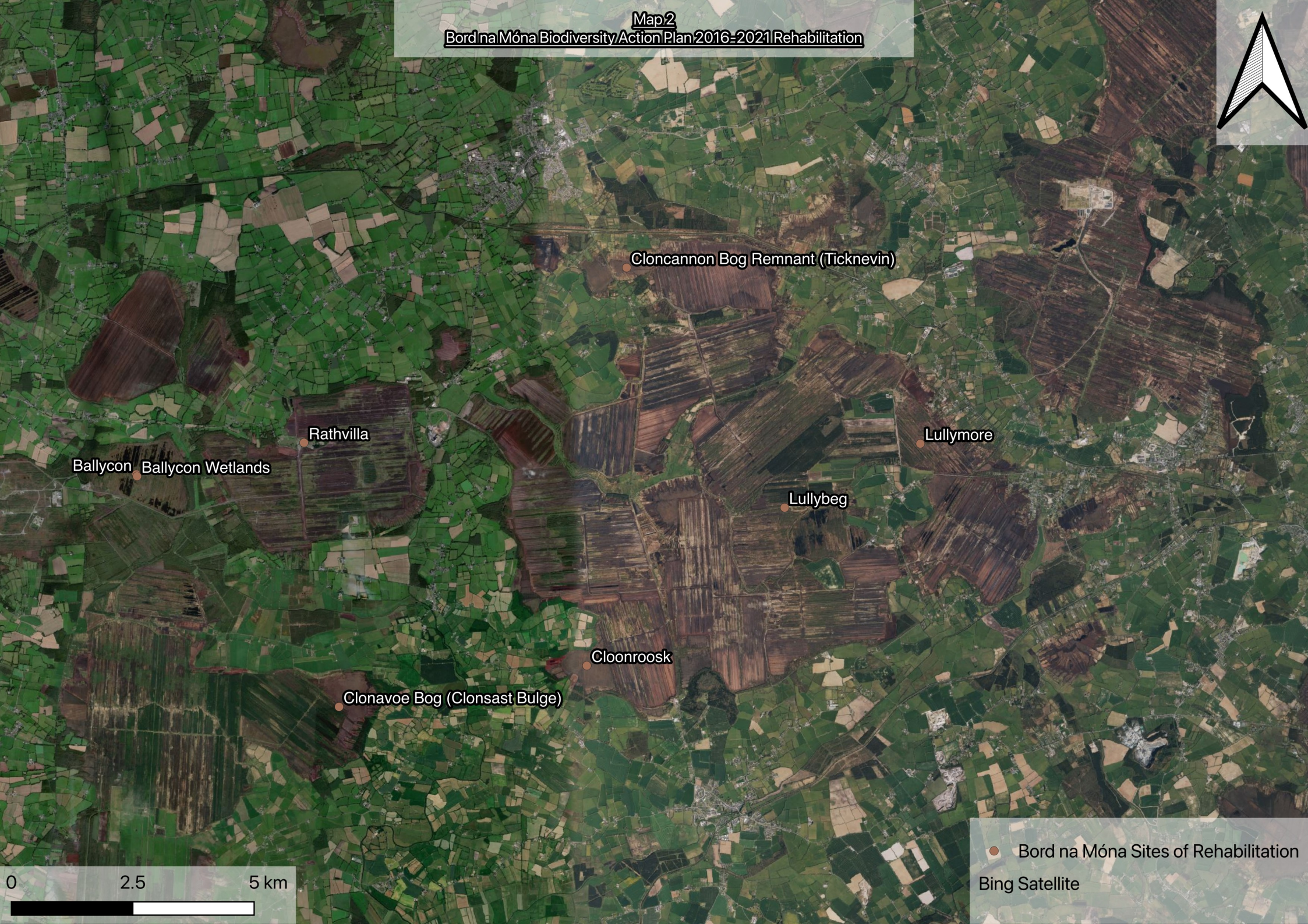
[6] Ireland's Peatland Conservation Action Plan 2020, Sarah Malone B.A.Heritage Studies, Dr Catherine O'Connell, The Irish Peatland Conservation Council, 2009.

[7] Lodge Bog Management Plan 2005-2010, Irish Peatland Conservation Council, Caroline Hurley, 2005.

[8] Checklist of Protected and Threatened Species in Ireland, National Parks & Wildlife Service, 2019.

[9] The Bog of Allen Heritage Survey 2005, Irish Peatland Conservation Council, Caroline Hurley, 2005


Map 1
Sites of Ecological Importance
The Long Derries SAC
Lullymore West
Lullybeg (Butterfly Conservation Site)
Lullymore Wetlands (BnM)
Lodge Bog South
Lodge Bog North
Lodge Bog Wetlands
Lodge Bog Wetlands
Ballysooghan North (Cloonroosk Little Bog)
Aghameelick
Mouds Bog SAC
Umeras Peatland Park
Pollardstown Fen SAC
0
2.5
5 km
Sites of Ecological Importance
Bing Satellite


Map 2
Bord na Móna Biodiversity Action Plan 2016-2021 | Rehabilitation
Cloncannon Bog Remnant (Ticknevin)
Rathvilla
Ballycon
Ballycon Wetlands
Lullymore
Lullybeg
Cloonroosk
Clonavoe Bog (Clonsast Bulge)
0
2.5
5 km
Bord na Móna Sites of Rehabilitation
Bing Satellite

Lakshmi Priya

From: Roads Admin <RoadsAdmin@offalycoco.ie>
Sent: Friday 5 December 2025 12:33
To: Aisling Thompson; Catherine Johnson; Ciarán Fitzgerald
Cc: Edenderry Municipal District
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: OCC (Roads) Cover Letter - 2025.12.03 - 250708.pdf; Ballydermot WF Constraints and Design EIAR Scoping Doc - F - 2025.12.04 - 250708.pdf

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Aisling,

I acknowledge receipt of your email in connection with the above.

Please be advised that your email has been forwarded to Edenderry Municipal District for their attention.

If you have any further queries please do not hesitate to contact Edenderry MD 0469731256 or by email, Edenderrymd@offalycoco.ie

Le dea-mhéin,
Kind regards,
Joe Moran

Oifigeach Cúnta Foirne,, Rannóg na mBóithre
Assistant Staff Officer, Roads Section

Comhairle Contae Uíbh Fhailí
Offaly County Council
Áras an Chontae, Bóthar Bhaile an Bhóthair, Tulach Mhór, Co. Uíbh Fhailí R35 F893
Áras an Chontae, Charleville Road, Tullamore, Co. Offaly R35 F893

| E. roadsadmin@offalycoco.ie | W. Offaly.ie

Comhairle Chontae Uíbh Fhailí
Offaly County Council



From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:58
To: Roads Admin <RoadsAdmin@offalycoco.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Catherine Johnson <cjohnson@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

You don't often get email from athompson@mkoireland.ie. Learn why this is important

Dear Sir/Madam,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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Offaly County Council: The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended recipient(s). This information may be subject to legal and professional privilege. If you are not an intended recipient of this email, you must not use, disclose, copy, distribute or retain this message or any part of it. If you have received this email in error, please notify the sender immediately and delete all copies of this email from your computer system(s) Unauthorised disclosure or communication or other use of the contents of this e-mail or any part thereof may be prohibited by law and may constitute a criminal offence. Comhairle Chontae Uibh Fhaili: Tá an t-eolais san ríomhphost seo, agus in aon ceangláin leis, faoi phribhléid agus faoi rún agus le h-aghaigh an seolaí amháin. D'fhéadfadh ábhar an seoladh seo bheith faoi phribhléid profisiúnta nó dlíthiúil. Mura tusa an seolaí a bhí beartaithe leis an ríomhphost seo a fháil, tá cosc air, nó aon chuid de, a úsáid, a chóipeál, nó a scaoileadh. Má tháinig sé chugat de bharr dearmad, téigh i dteagmháil leis an seoltóir agus scrios an t-ábhar ó do ríomhaire le do thoil.

Lakshmi Priya

From: Drainage Admin <drainage.admin@opw.ie>
Sent: Monday 23 March 2026 15:56
To: Aisling Thompson
Subject: FW: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare
Attachments: Ballydermot.png

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Hi Aisling,

Thank you for your email.

Please see comments from regional engineer below.

The attached map shows the OPW channels in blue in that area, the channels in Red are Drainage district channels and are maintained by the local Authority.

If the proposed windfarm coincides with any of the highlighted OPW channels, queries can be directed to the Regional Engineer for that area Jamie.Keogh@opw.ie.

Kind Regards,
Amy

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Wednesday 18 March 2026 16:36
To: Info Opw <info@opw.ie>
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Aire: Tháinig an ríomhphost seo ó lasmuigh den OPW. Ná cliceáil ar aon naisc nó ná hoscail ceangaltáin mura n-aithníonn tú an seoltóir. Má tá amhras ort, tuairiscigh an ríomhphost chuig an ***Deasc Chabhrach TFC*** agus déan teagmháil le ***Cibearshlándáil.***
Caution: This email originated from outside OPW. Do not click on any links or open attachments unless you recognise the sender. If in doubt, please report email to the ***ICT Helpdesk*** and contact ***Cybersecurity.***

Good afternoon,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Ballydermot Wind Farm Development. If so, can you please get back to me at your earliest convenience.

Thank you.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Aisling Thompson
Sent: Tuesday 13 January 2026 12:41
To: 'Info Opw' <info@opw.ie>
Subject: RE: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Ballydermot Wind Farm Development. If so, can you please get back to me at your earliest convenience.

Thank you.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

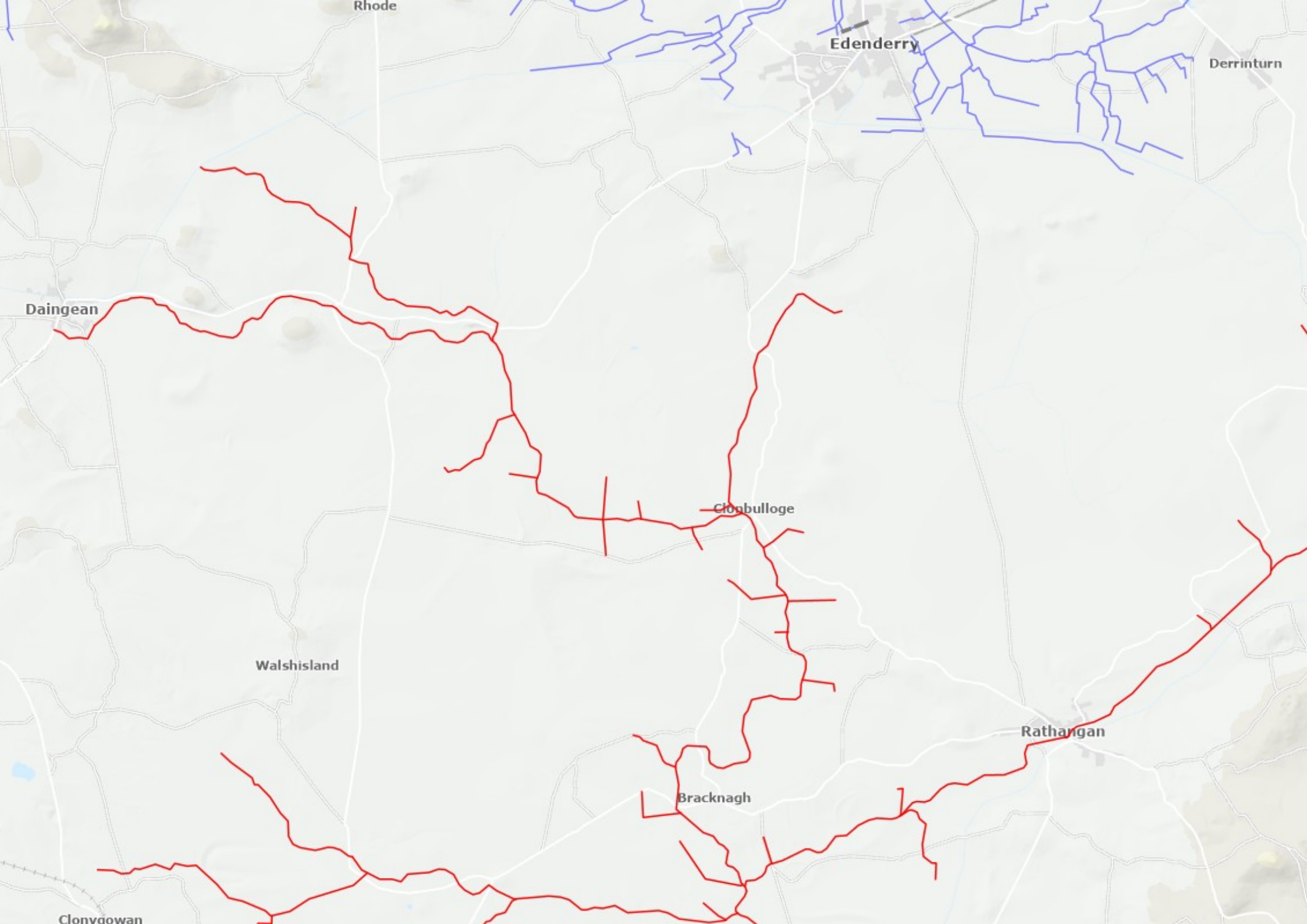
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From: Info Opw <info@opw.ie>
Sent: Thursday 4 December 2025 14:27
To: Aisling Thompson <athompson@mkoireland.ie>
Subject: Automatic reply: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Thank you for your email to the Office of Public Works. Your query has been forwarded to the relevant section within the OPW for direct reply. If you do not receive a response within 20 working days, please email this address again for further assistance. All Media queries should be emailed to pressoffice@opw.ie This is an automated response. Please do not respond to this email. Go raibh maith agat as an ríomhphost uait chuig Oifig na nOibreacha Poiblí. Seoladh do cheist chuig an rannóg chuí taobh istigh den OPW a thabharfaidh freagra díreach duit. Sa chás nach bhgaigheann tú freagra taobh istigh de 20 lá oibre, seol ríomhphost chuig an seoladh seo arís le do thoil, chun cúnamh breise a fháil. Ba chóir ceisteanna meáin a sheoladh trí ríomhphost chuig pressoffice@opw.ie Is freagra uathoibrithe é seo. Ná seol freagra ar an ríomhphost seo le do thoil.
Email Disclaimer: https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/


Rhode
Edenderry
Derrinturn
Daingean
Clonbulloge
Walshisland
Rathangan
Bracknagh
Clonygowan

Aisling Thompson

From: INFO <Information@tii.ie>
Sent: Tuesday 6 January 2026 15:18
To: Aisling Thompson
Subject: TII25-134402 - EIAR Scoping request - Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Ms. Thompson,

Thank you for your correspondence of 4 December 2025 regarding the above. Transport Infrastructure Ireland's (TII) position in relation to your enquiry is as follows.

TII wishes to advise that it is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

EIAR preparation should acknowledge official policy concerning access to national roads, outlined in the DoECLG 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012). Government policy seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply. Therefore, there are policy and road safety considerations that would need to be considered and addressed in any subsequent substitute consent application to the Board.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the National Road Network.

The developer/scheme promoter should have regard, among other things, to the following:

- As set down in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, that the National Road Network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the National Road Network, in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.

- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.

- TII would be specifically concerned as to potential significant impacts the development would have on the National Road Network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.

- The National Road Network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities, in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded. Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII, before the works can take place.

- Additionally, any damage caused to the pavement on the existing national road arising from any temporary works, due to the turning movement of abnormal loads (e.g. tearing of the surface course, etc.), shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority, prior to the commencement of any development on site.

- It is noted that the grid connection proposals outlined in the EIAR Scoping Report do not impact the strategic National Road Network. However, in the event of any alteration, please note, any grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing, where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the National Road Network and junctions of lower category roads with national roads.

- The designers are asked to consult TII Publications, to determine whether a Road Safety Audit is required.

- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).

- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes' (National Road Authority (NRA), 2014).

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed, in accordance with best practise.

I trust that the above comments are of assistance in your EIAR preparation.

Yours sincerely,

_____
Andrew Moore
Senior Regulatory & Administration Executive

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:27
To: Landuse Planning <LandUsePlanning@tii.ie>; INFO <Information@tii.ie>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>

Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Mr Mills,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Transport Infrastructure Ireland in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

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From: Karen Mulryan
Sent: Tuesday 2 February 2021 12:28
To: 'info@tii.ie'
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist
MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Lakshmi Priya

From: INFO <Information@tii.ie>
Sent: Tuesday 21 April 2026 10:14
To: Catherine Johnson
Subject: TII25-134402 - EIAR Scoping request - Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (TII)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Ms. Johnson,

Thank you for your correspondence of 14 April 2026 regarding the above. Transport Infrastructure Ireland's (TII) position in relation to your enquiry is as follows.

Having regard to the EIAR scoping response already issued, the contents of which remains relevant to the project scoping information received as part of your original request, TII reiterates that it is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach adopted by TII in making such submissions or comments seeks to uphold official policy, as outlined in the Department of the Environment, Community and Local Government (DoECLG) Guidelines, 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012). Regard should also be had to other relevant guidance available at www.TII.ie.

TII is not a planning authority and, therefore, TII makes no decisions on planning applications. TII is a statutory consultee under planning legislation, this means that the Planning Authority will circulate certain planning applications to TII for observation. TII's submissions or comments on planning applications, if any, represent our primary input to the development management planning process. TII submissions are made only to the Planning Authority concerned, when they send planning applications to TII for comment.

Having regard to the statutory consultee role of TII, it is advised that all pre-planning enquiries and discussions should take place with the appropriate local planning authority/authorities, which will be the relevant County Council Planning Departments. The Planning Authority will liaise directly and/or request liaison with TII through the appropriate protocol and established practice, if they deem it necessary.

I hope that this information is of assistance to you.

Yours sincerely,

_____

Andrew Moore
Senior Regulatory & Administration Executive

From: Catherine Johnson <cjohnson@mkoireland.ie>
Sent: Tuesday 14 April 2026 09:47
To: INFO <Information@tii.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>
Subject: RE: TII25-134402 - EIAR Scoping request - Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare (TII)

Hi,

My name is Catherine Johnson, and I am the project manager on the Ballydermot Wind Farm Project.

Thank you for the below scoping response received on the 6th January 2026.

We are writing to request a meeting with TII in order to discuss the proposals for the site.

A draft agenda is provided below:

- MKO to provide an overview of the Proposed Project,
- MKO and Al to provide an overview of surveys undertaken on the site to date
- MKO and AL to provide overview of Proposed Haul Routes, including diversion routes and structural assessment surveys
- TII to offer feedback on the project

The meeting is requested to obtain any insights from TII in relation to the Proposed Project.

The following to attend the meeting:

-Catherine Johnson and Ellen Costello (MKO Environmental Scientist/EIAR Project Manager)
-Julie Larkin (BNM Project Manager)
-Alan Lipscombe (Traffic and Transport Specialist)

Please let me know your availability for a meeting on the above. Thank you in advance.

Kind regards,
Catherine

Catherine Johnson BSc. LLM.
Project Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

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From: INFO <Information@tii.ie>
Sent: Tuesday 6 January 2026 15:18
To: Aisling Thompson <athompson@mkoireland.ie>
Subject: TII25-134402 - EIAR Scoping request - Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Ms. Thompson,

Thank you for your correspondence of 4 December 2025 regarding the above. Transport Infrastructure Ireland's (TII) position in relation to your enquiry is as follows.

TII wishes to advise that it is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at www.TII.ie.

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals, following the examination of any valid planning application referred.

EIAR preparation should acknowledge official policy concerning access to national roads, outlined in the DoECLG 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012). Government policy seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50 kph apply. Therefore, there are policy and road safety considerations that would need to be considered and addressed in any subsequent substitute consent application to the Board.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the National Road Network.

The developer/scheme promoter should have regard, among other things, to the following:

- As set down in the Spatial Planning and National Roads Guidelines, it is in the public interest that, in so far as is reasonably practicable, that the National Road Network continues to serve its intended strategic purpose. The EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the National Road Network, in order to demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network.

- Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.

- TII would be specifically concerned as to potential significant impacts the development would have on the National Road Network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route.

- The National Road Network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities, in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements, including delivery timetabling, etc., to ensure that the strategic function of the national road network is safeguarded. Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of turbine components to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII, before the works can take place.

- Additionally, any damage caused to the pavement on the existing national road arising from any temporary works, due to the turning movement of abnormal loads (e.g. tearing of the surface course, etc.), shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the Road Authority, prior to the commencement of any development on site.

- It is noted that the grid connection proposals outlined in the EIAR Scoping Report do not impact the strategic National Road Network. However, in the event of any alteration, please note, any grid connection and cable routing proposals should be developed to safeguard proposed road schemes, as TII will not be responsible for costs associated with future relocation of cable routing, where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the National Road Network and junctions of lower category roads with national roads.

- The designers are asked to consult TII Publications, to determine whether a Road Safety Audit is required.

- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).

- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes' (National Road Authority (NRA), 2014).

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed, in accordance with best practise.

I trust that the above comments are of assistance in your EIAR preparation.

Yours sincerely,

_____
Andrew Moore
Senior Regulatory & Administration Executive

From: Aisling Thompson <athompson@mkoireland.ie>
Sent: Thursday 4 December 2025 14:27
To: Landuse Planning <LandUsePlanning@tii.ie>; INFO <Information@tii.ie>
Cc: Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>
Subject: 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

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Dear Mr Mills,

MKO is preparing an Environmental Impact Assessment Report (EIAR), on behalf of Bord na Móna Powergen Ltd., for a proposed wind farm development located approximately 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village. The Proposed Wind Farm will be located on the Allen Bog Group which comprises 14 no. bogs and is located on the border of County Offaly and

County Kildare. The grid connection and associated infrastructure will traverse through Allenwood, Co. Kildare and Prosperous, Co. Kildare, with infrastructure proposed in the townland of Lullymore and Killybegs, Co Kildare and adjacent townlands. MKO would have previously carried out scoping with the Transport Infrastructure Ireland in February 2021, please see the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021 below.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

It is envisaged that the proposed renewable energy development will comprise approximately 47 no. wind turbines, access roads and entrances, associated passing bays, an onsite 220kV substation, offsite 220kV substation, underground electrical 220kV cabling, overhead line 220kV cabling, underground electrical 33kV cabling, temporary construction compounds and 2 permanent meteorological masts, drainage, amenity tracks and car parks, relay mast, temporary construction compounds, temporary security cabins, ecological and ornithological enhancement, and all associated site work and ancillary works.

The planning application will be submitted directly to An Coimisiún Pleanála (formerly An Bord Pleanála), as it is envisioned to be above the 50 megawatts (MW) for wind energy as set out in the 7th Schedule of the Planning and Development Act 2000, (as amended).

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, an updated Constraints and Design Scoping Report providing details of the Proposed Development is attached. 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.

Kind regards,
Aisling.

Aisling Thompson
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: Karen Mulryan
Sent: Tuesday 2 February 2021 12:28
To: 'info@tii.ie'
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good afternoon,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

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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.

Kind regards,

Karen.

Karen Mulryan
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Lakshmi Priya

From: Datarequests <Datarequests@water.ie>
Sent: Tuesday 21 April 2026 11:59
To: Catherine Johnson
Cc: Ellen Costello; Ciarán Fitzgerald; Lakshmi Priya; Emmett Hegarty(C)
Subject: RE: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare. (UE - Water / Data Request)

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Hi Catherine,

Hope you're keeping well.

Please, find below link to download the maps requested.

https://fx.topsec.com/?a=d&i=NikarEmnyIv0XrK

We hope this helps. Let me know if you experience any trouble to view the maps so I will follow up and assist.

Kind regards,

Juan

Asset Data Coordinator - Provision

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

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Datarequests@water.ie



Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na

bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

From: Catherine Johnson <cjohnson@mkoireland.ie>
Sent: Tuesday 14 April 2026 16:41
To: Datarequests <Datarequests@water.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Lakshmi Priya <lpriya@mkoireland.ie>; Emmett Hegarty(C) <emmett.hegarty@water.ie>
Subject: RE: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare. (UE - Water / Data Request)

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HI Juan,

Thank you for the response, we would be seeking PDF maps only for this site.

Please see the boundary attached to this email.

If you need anything further please let me know!

Kind regards,
Catherine

Catherine Johnson BSc. LLM.
Project Environmental Scientist

MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Datarequests <Datarequests@water.ie>
Sent: Tuesday 14 April 2026 10:18
To: Catherine Johnson <cjohnson@mkoireland.ie>
Cc: Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Lakshmi Priya <lpriya@mkoireland.ie>; Emmett Hegarty(C) <emmett.hegarty@water.ie>
Subject: RE: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare. (UE - Water / Data Request)

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Thank you for contacting Data Requests.

Data Requests supply records of Uisce Éireann Infrastructure in GIS format (i.e. **shp**, .**gdb**, .**tab**, or **.dwg**).

For maps in **PDF,** please ignore the NDA form and reply stating you only require **PDF** maps.

In order to speed up the process, we ask that you provide us with a polygon of your desired area of study in ***ING coordinates*** **(.dwg - 2013 or lower versions or .shp in ING) that outlines the extent and location of the area(s) that you require data.** Alternatively, please provide Eircode or 4 points with the extension of the area (top left, top right, bottom left, bottom right).

If you wish to proceed to acquire GIS digital data, we ask you to complete a Non Disclosure Agreement Form (1b - attached). In Appendix (Page 4) Sections a-h of this form, please ensure that all sections are completed as per the outline shown in the attached guide. If a section is not relevant, please indicate this. Can you also please ensure that you detail the nature of the data you require. For example, Water Distribution **and/or** Sewer Network in .dwg, .tab or .shp format (please refer to the attached guide 1a to assist you).

Please Note:

1. Uisce Éireann is responsible for issuing Water & Wastewater **digital** data in GIS format and will issue the data in **one format only** (.shp, .gdb, .tab, .dwg or .pdf).
2. Local Authorities are responsible for maintaining and issuing Stormwater data. Uisce Éireann does not issue Stormwater data.

Attached **1b. Non-Disclosure Agreement Form** must be **signed by hand.** Please complete all required sections, namely **a to h, Description of Data, and Appendix A**. This is a legally binding document, therefore all sections must be completed, please refer to attached 1a) Guide to completing Non-Disclosure Agreement.

Disclaimers: Any maps produced using Uisce Éireann data require the appropriate disclaimer as outlined in the relevant attachment (1a).

Please Note: The average turnaround time for processing requests is 2 weeks or 10 working days, provided you have adhered to the requirements set out above.

Due to the large volume of data requests received daily, incomplete or inaccurately completed forms will result in delays to issuing data. Consequently, the sole responsibility lies with the requestor to ensure that the above guidelines are adhered to, and relevant documentation is submitted.

Should you have any questions in relation to the above, please do not hesitate to get in contact.

Kind regards,

Juan

Asset Data Coordinator - Provision

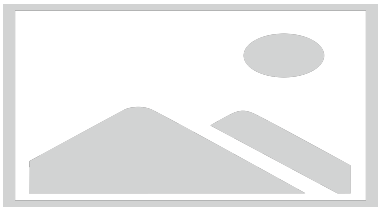
Uisce Éireann
Teach Colvill, 24-26 Sráid Thalbóid, Baile Átha Cliath 1, D01 NP86, Éire

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

www.water.ie

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Datarequests@water.ie



Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.

From: Catherine Johnson <cjohnson@mkoireland.ie>
Sent: Tuesday 14 April 2026 10:05
To: Emmett Hegarty(C) <emmett.hegarty@water.ie>
Cc: Datarequests <Datarequests@water.ie>; Ellen Costello <ecostello@mkoireland.ie>; Ciarán Fitzgerald <cnfitzgerald@mkoireland.ie>; Lakshmi Priya <lpriya@mkoireland.ie>
Subject: RE: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare. (UE - Water / Data Request)

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Good Morning,

I would just like to follow up on the below email, as we would welcome any comments that you may have in relation to the proposed Ballydermot Wind Farm, located in Co. Offaly and Co. Kildare, 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.

As well, if UE could please advise on any watermains running through the site via PDF it would be greatly appreciated.

If you have any further questions, please let me know. Thank you.

Kind regards,
Catherine

Catherine Johnson BSc. LLM.
Project Environmental Scientist

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Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
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From: Aisling Thompson
Sent: Wednesday 18 March 2026 16:44
To: Emmett Hegarty(C) <emmett.hegarty@water.ie>
Subject: RE: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

Good afternoon,

With regards to the below email, I wish to follow up to see if you have any comments or queries in relation to the proposed Ballydermot Wind Farm Development. If so, can you please get back to me at your earliest convenience.

Thank you.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin
mkoireland.ie | +353 (0)91 735 611

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From: Aisling Thompson
Sent: Tuesday 13 January 2026 16:34
To: 'Emmett Hegarty(C)' <emmett.hegarty@water.ie>
Subject: RE: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

Hi Emmett,

We have not received a response from Uisce Eireann in relation to this proposal. That would be highly appreciated for you to do so.

If you have any questions, please let me know.

Thank you.

Kind regards,
Aisling.

Aisling Thompson, LLM, BSc
Graduate Environmental Scientist
MKO
Tuam Road, Galway, H91 VW84

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From: Emmett Hegarty(C) <emmett.hegarty@water.ie>
Sent: Tuesday 13 January 2026 16:27
To: Aisling Thompson <athompson@mkoireland.ie>
Subject: UE observations on Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

You don't often get email from emmett.hegarty@water.ie. Learn why this is important

Caution: This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Aisling

Just following up on your query regarding the EIAR scoping input request for 250708 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare.

I'm just wondering ,did you receive a response from us in relation to this proposal?

If not, please let accept my apologies and let me know, I can reissue one on behalf of UE ASAP.

All the best
-Emmett

Emmett Hegarty
Development Management Planning
Uisce Éireann
Teach na hAbhann Duibhe, Mala, Co. Chorcaí, P51 K3CX
M +353 87 345 9798
emmett.hegarty@water.ie
www.water.ie

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

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Thank you for your attention.

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú

a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

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Thank you for your attention.

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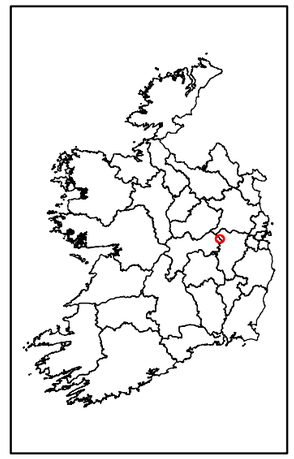
faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

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Thank you for your attention.





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

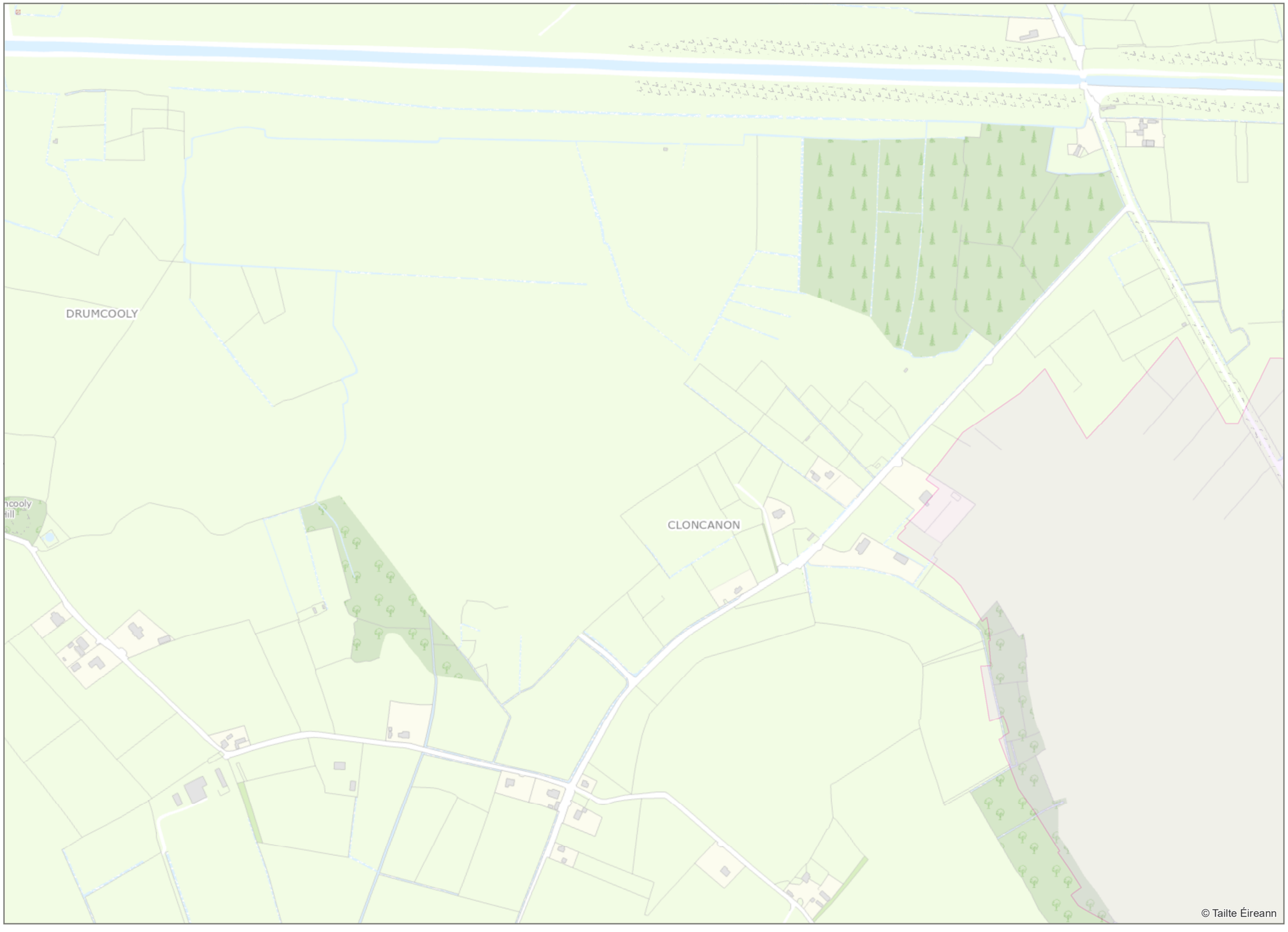
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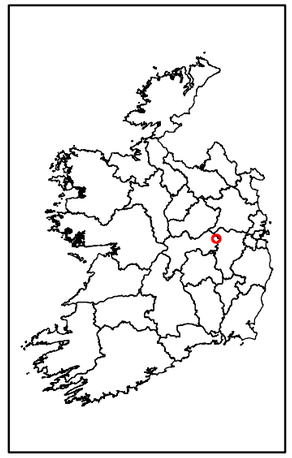
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Sewer Network - A3





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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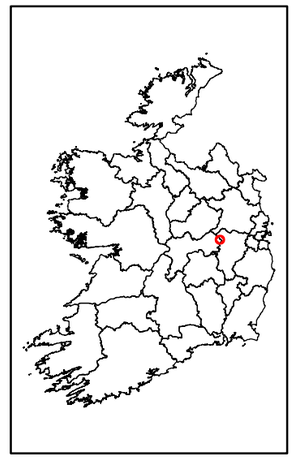
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Sewer Network - B2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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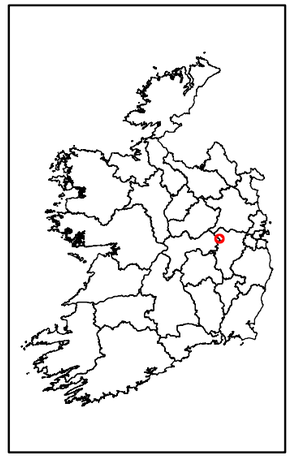
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Sewer Network - B3



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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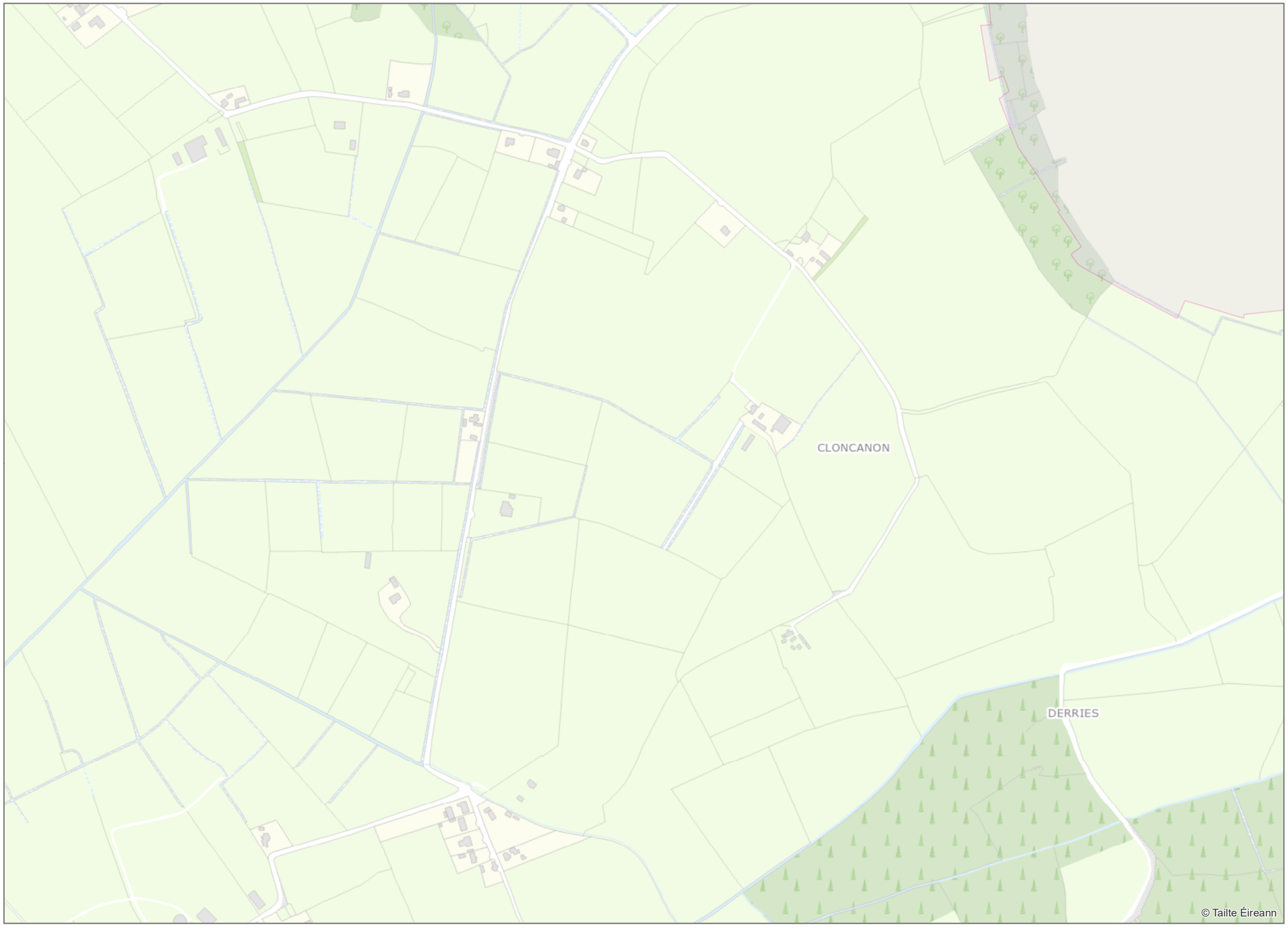
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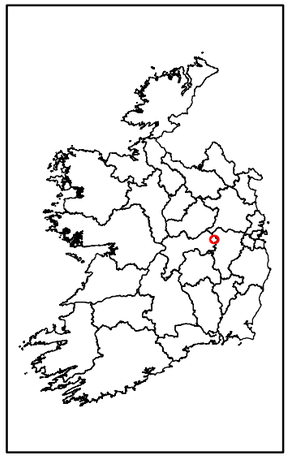
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Sewer Network - B4





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

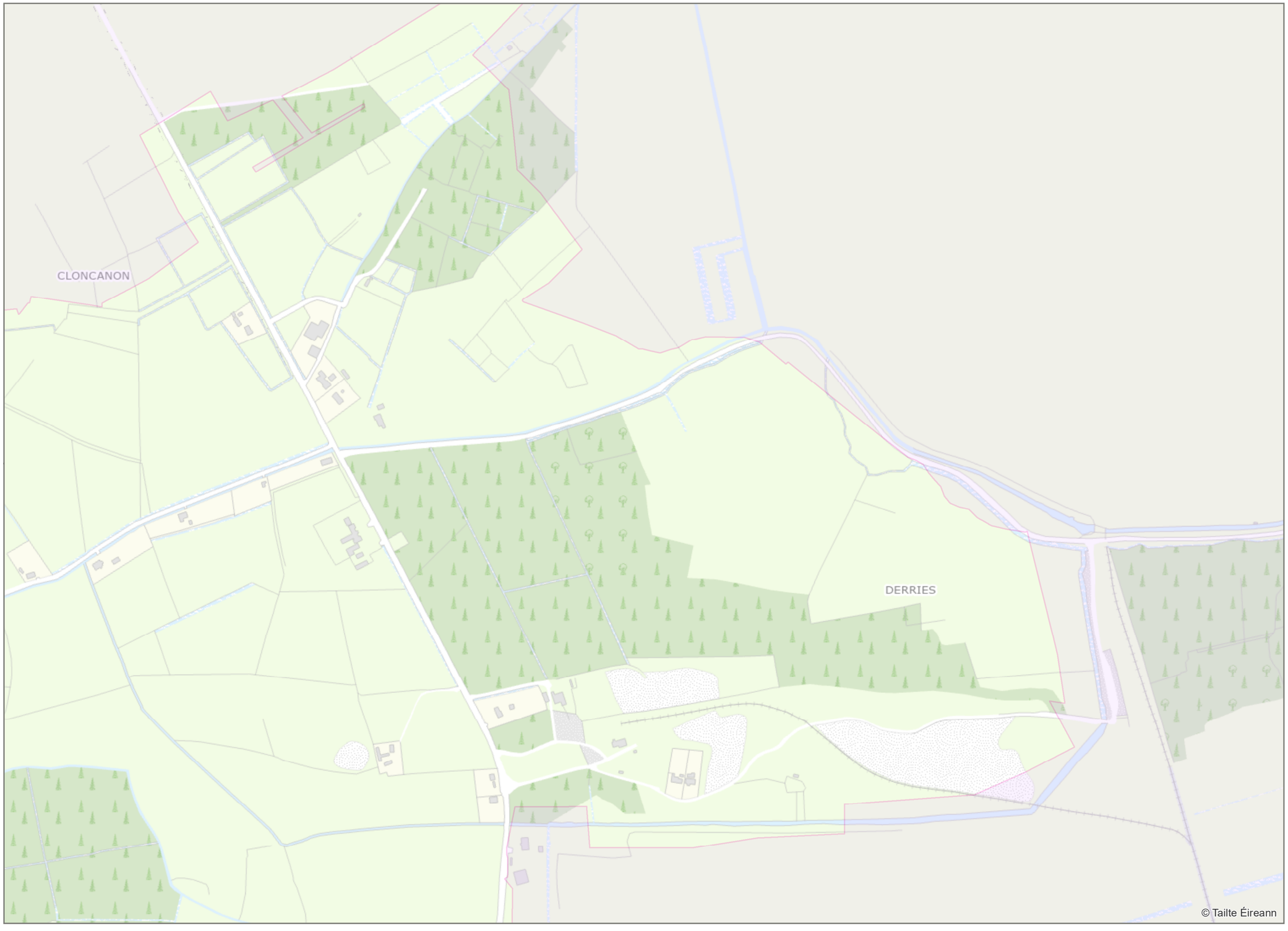
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Sewer Network - C2



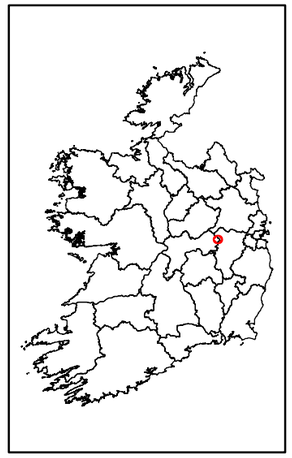
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Sewer Network - C3



Legend

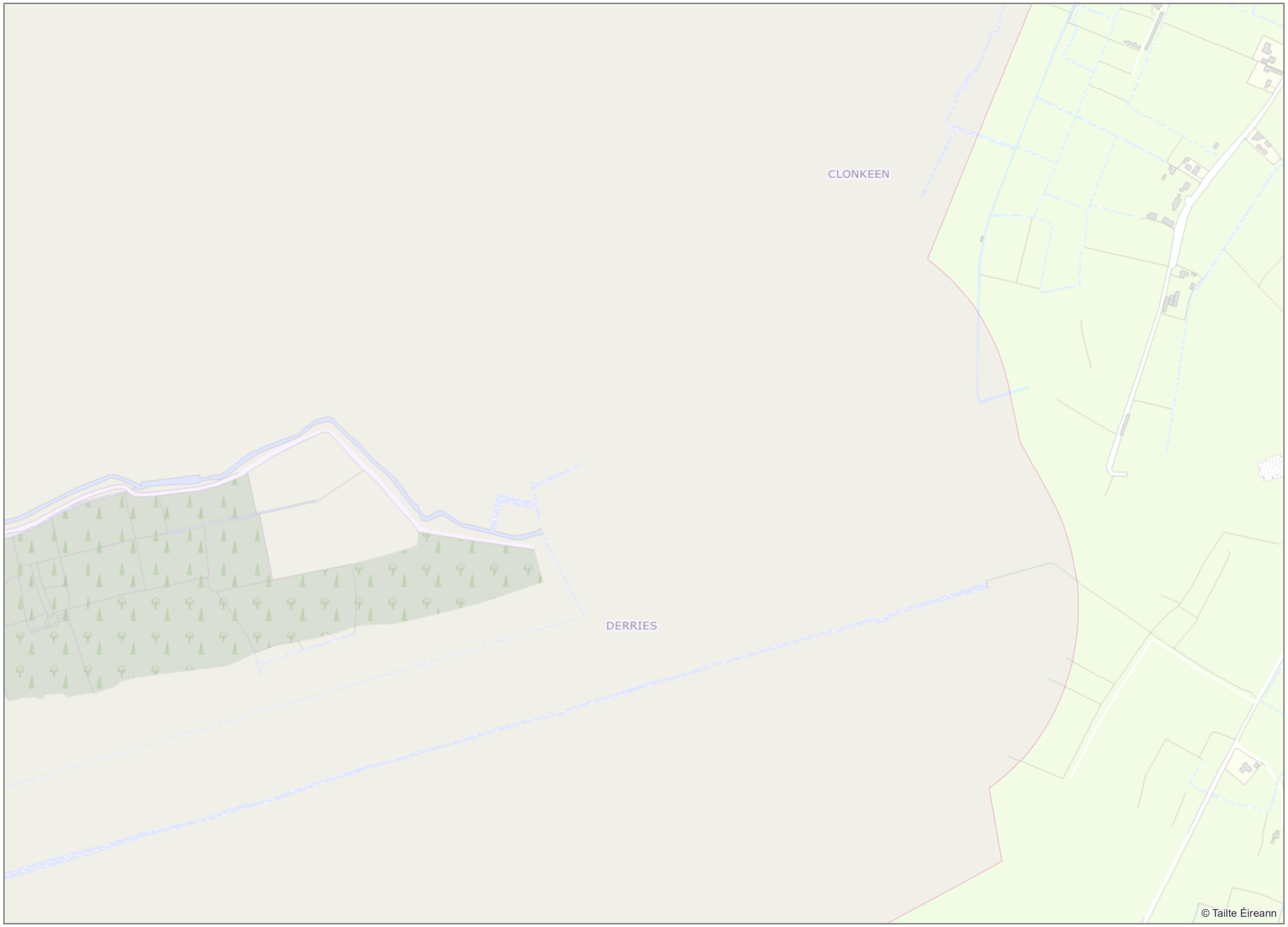
Proposed Development Boundary

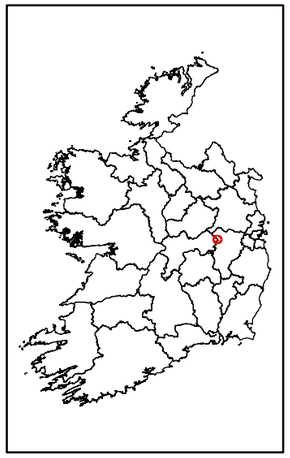
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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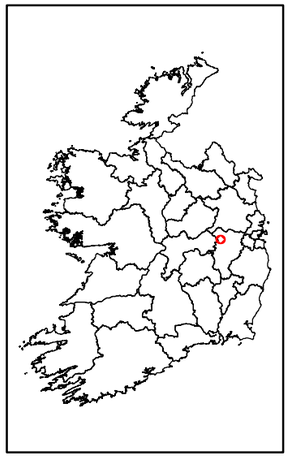
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Sewer Network - C4





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

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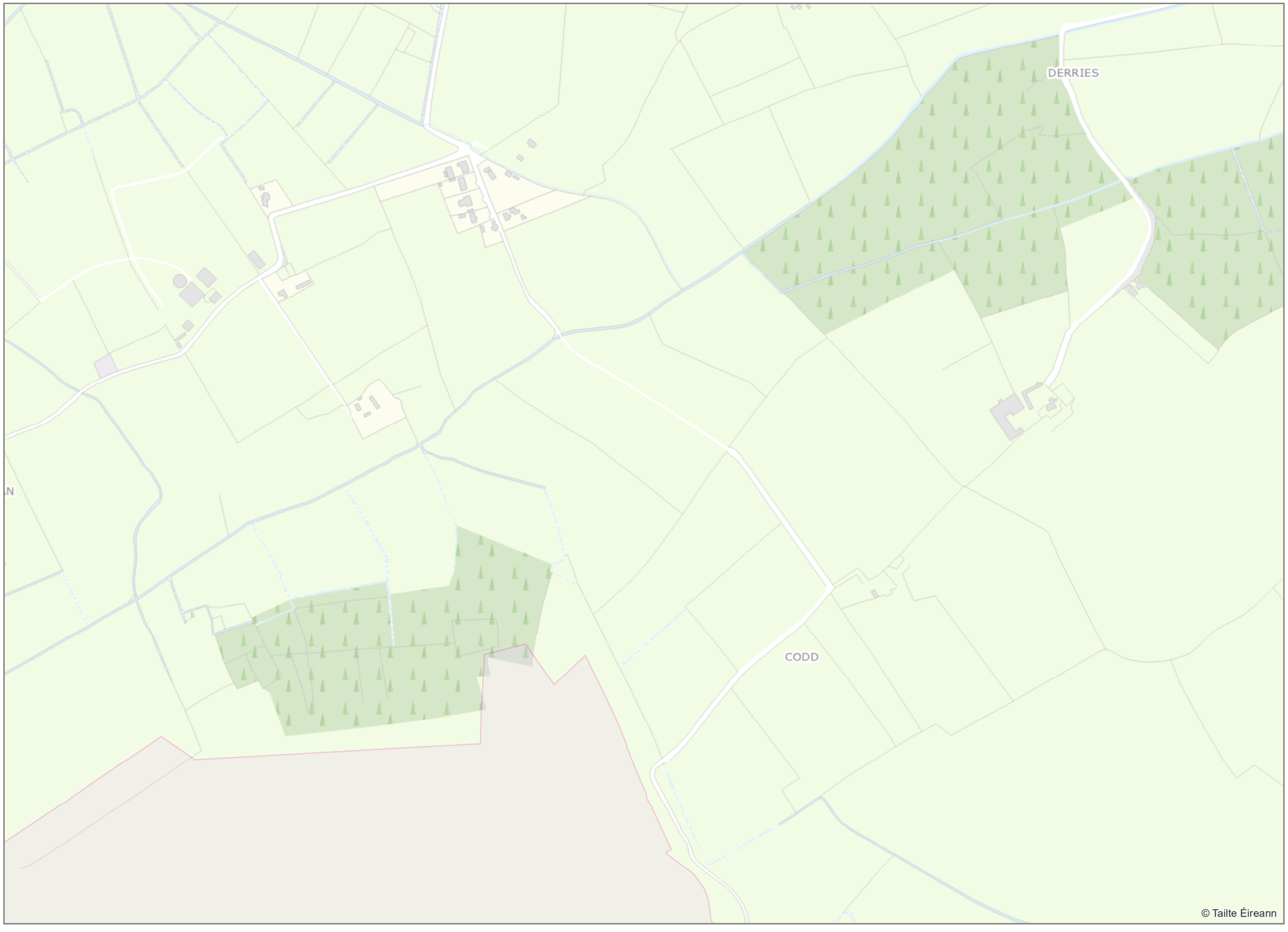
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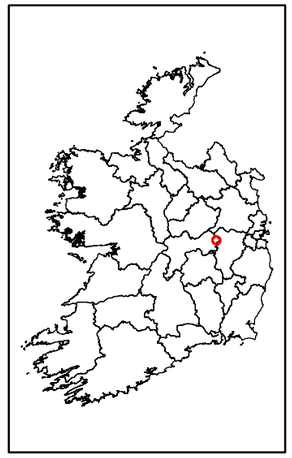
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Sewer Network - C6



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

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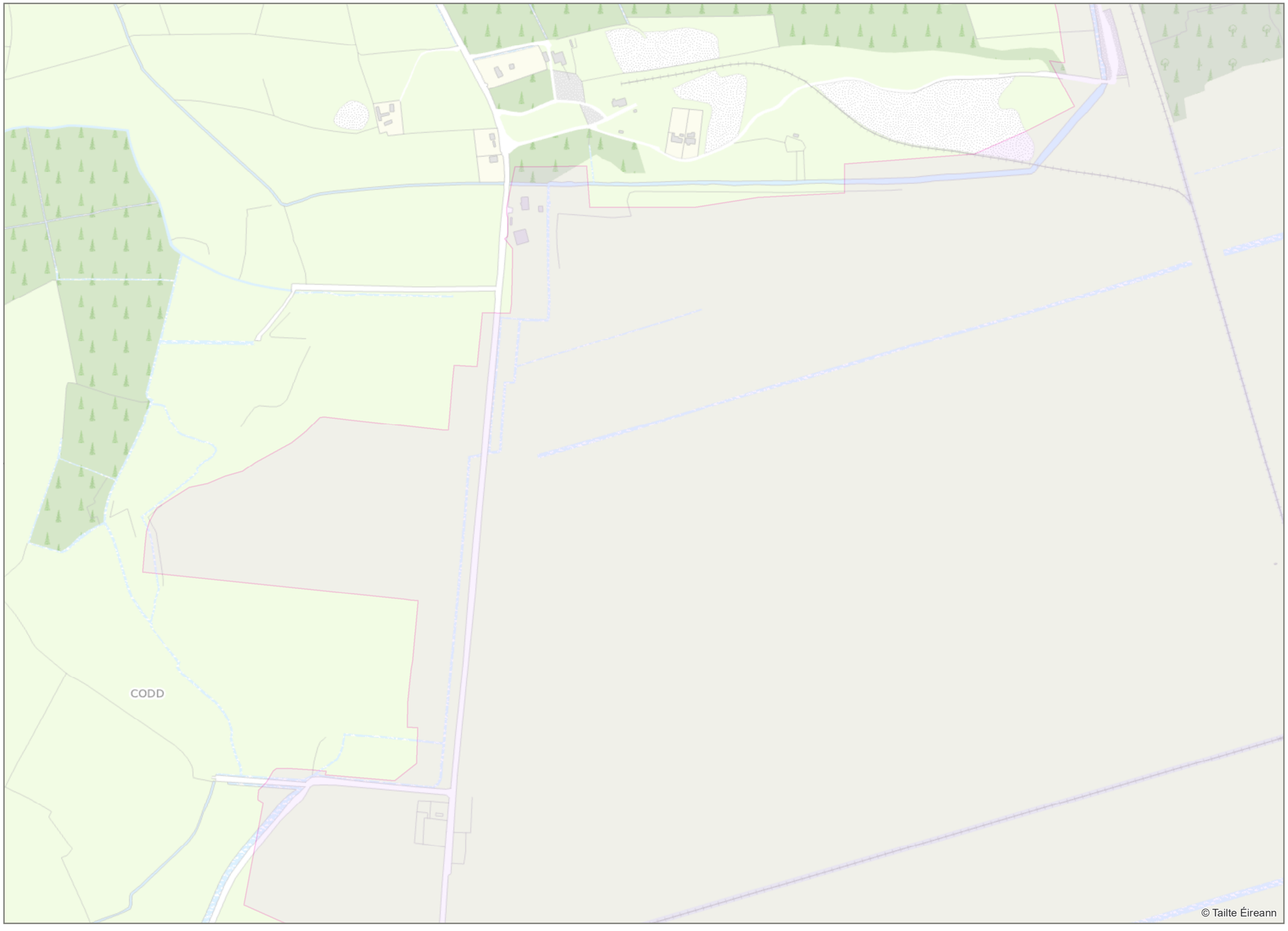
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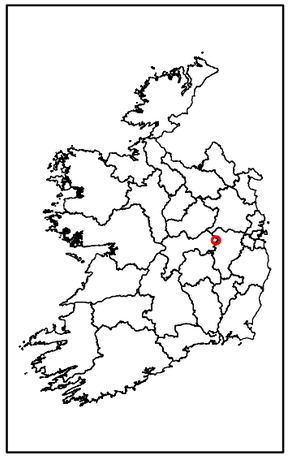
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Sewer Network - D2



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

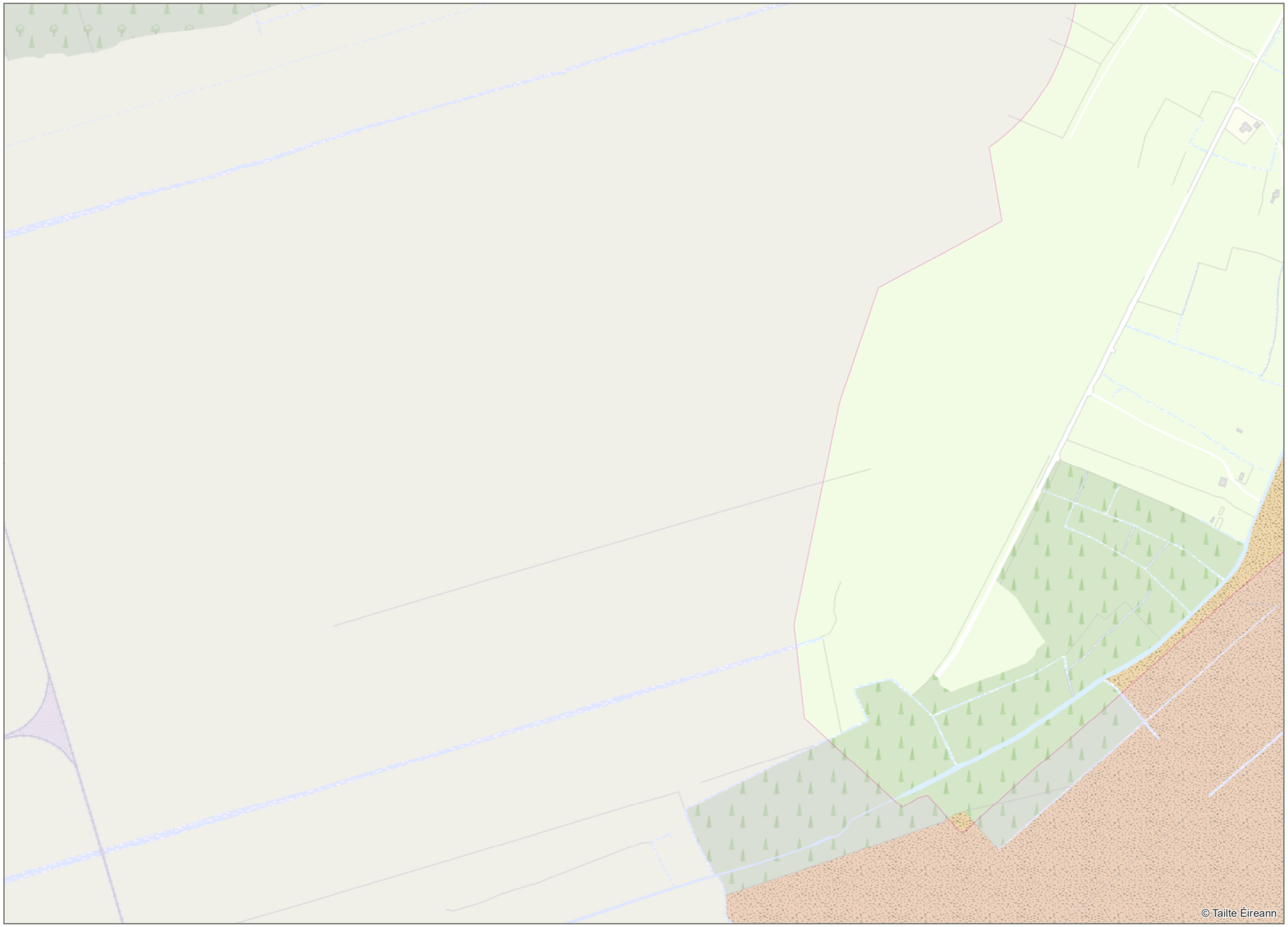
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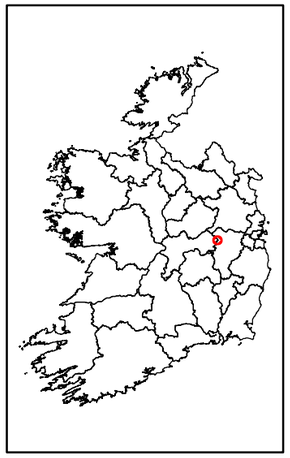
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Sewer Network - D3





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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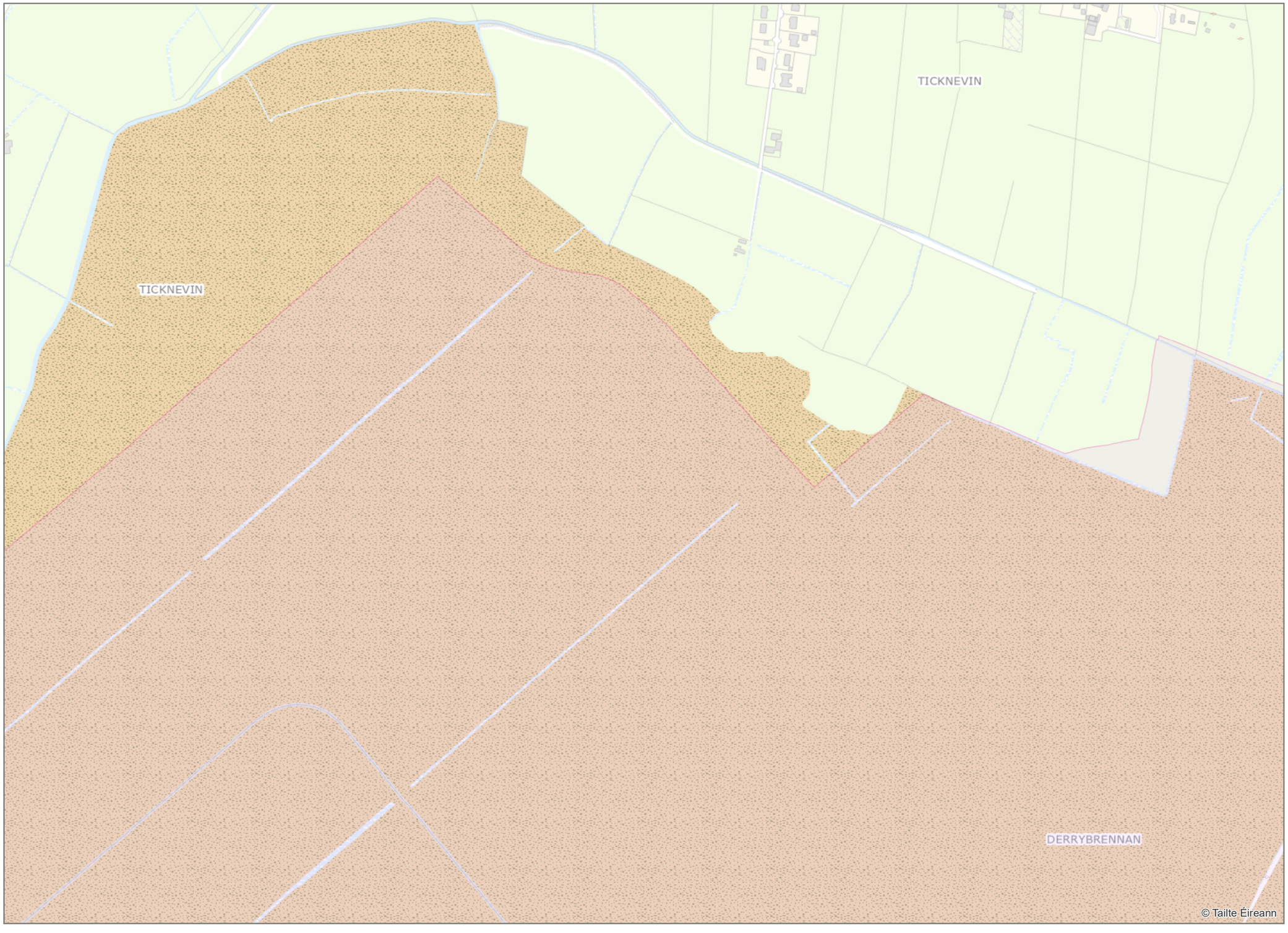
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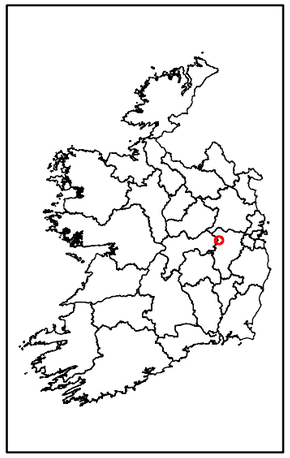
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Sewer Network - D4



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

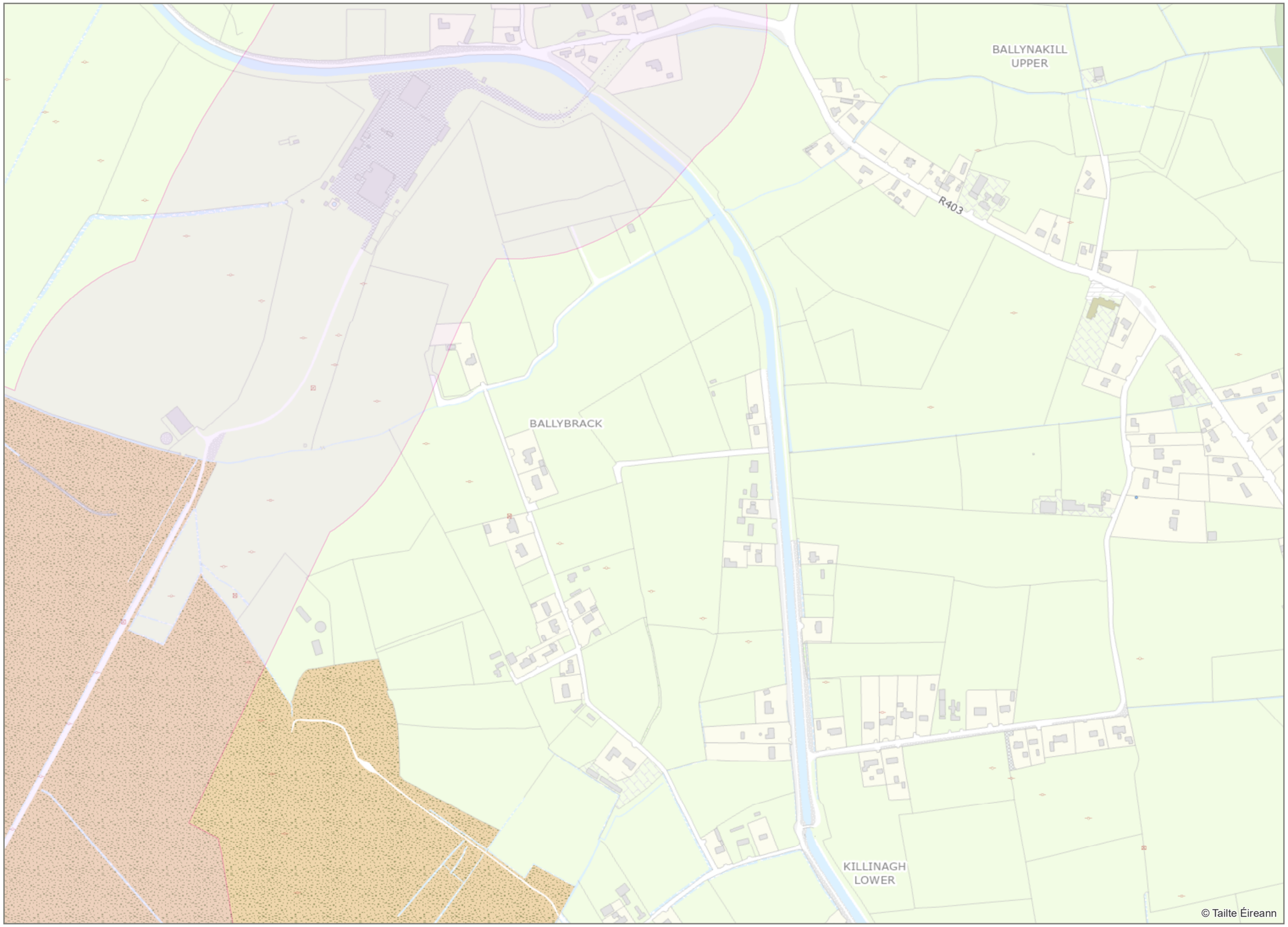
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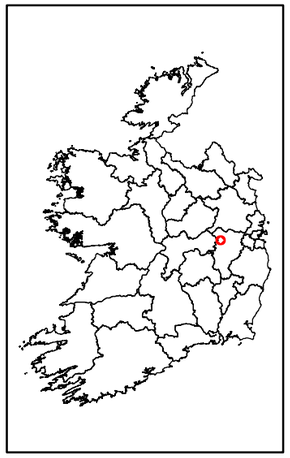
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Sewer Network - D5



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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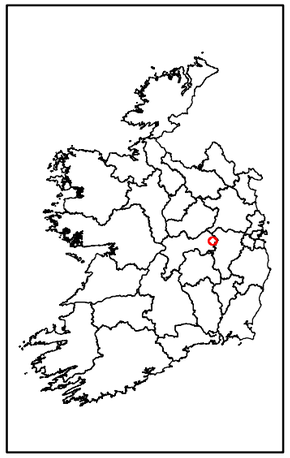
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Sewer Network - D6



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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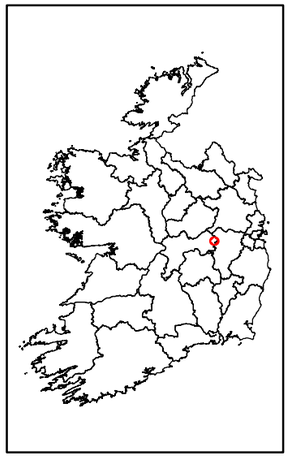
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Sewer Network - E1





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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Sewer Network - E2



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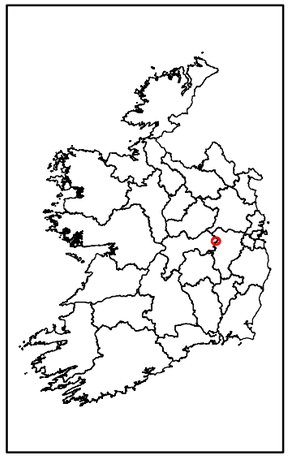
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Sewer Network - E3

Uisce Éireann
Irish Water



Legend

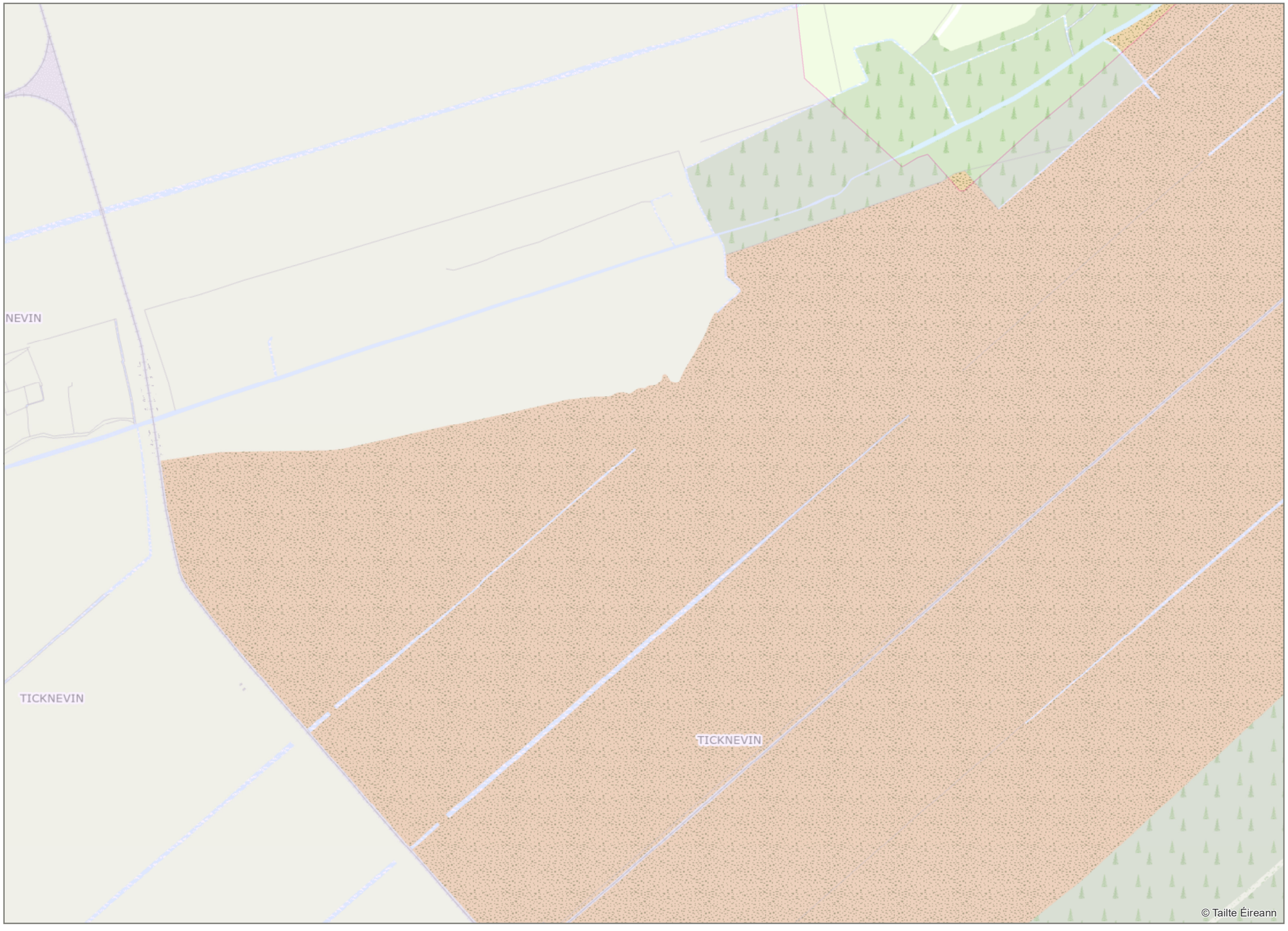
Proposed Development Boundary

0 45 90 180 m

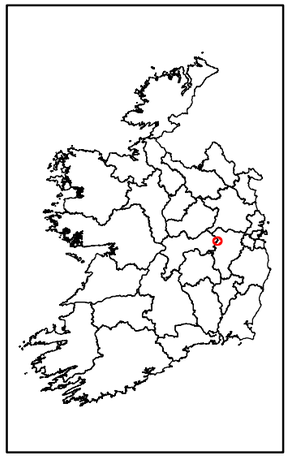
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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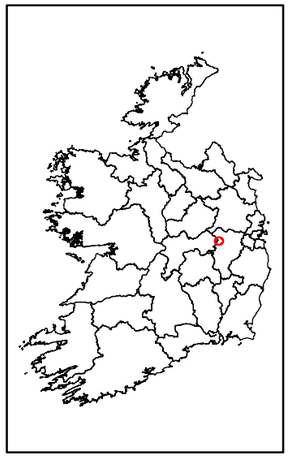
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Sewer Network - E4





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

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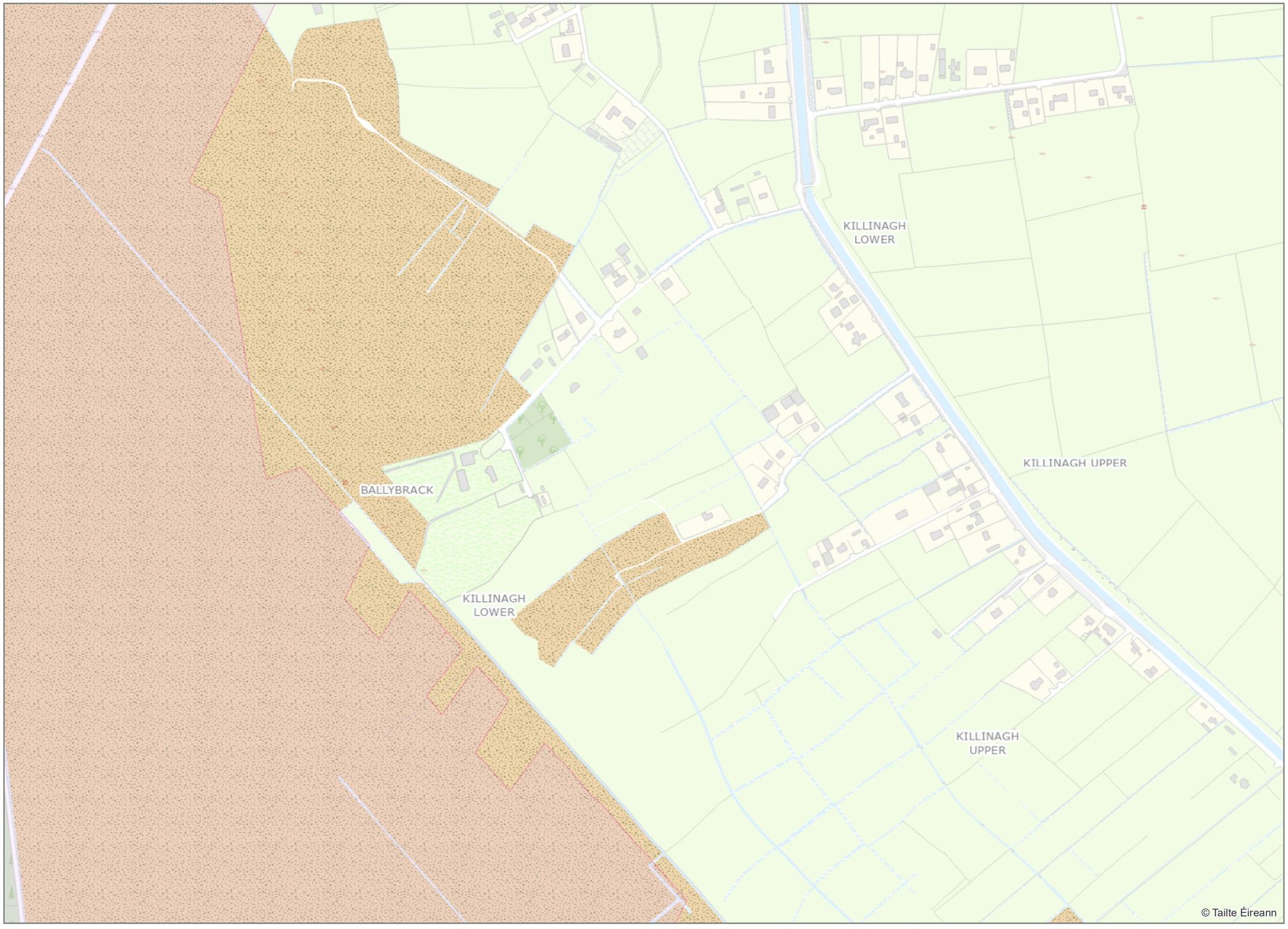
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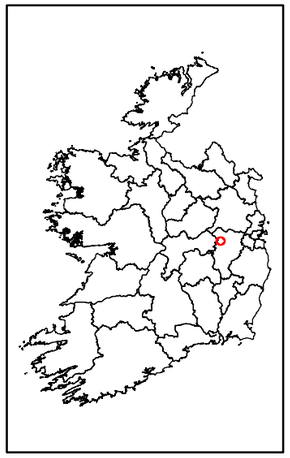
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Sewer Network - E5



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

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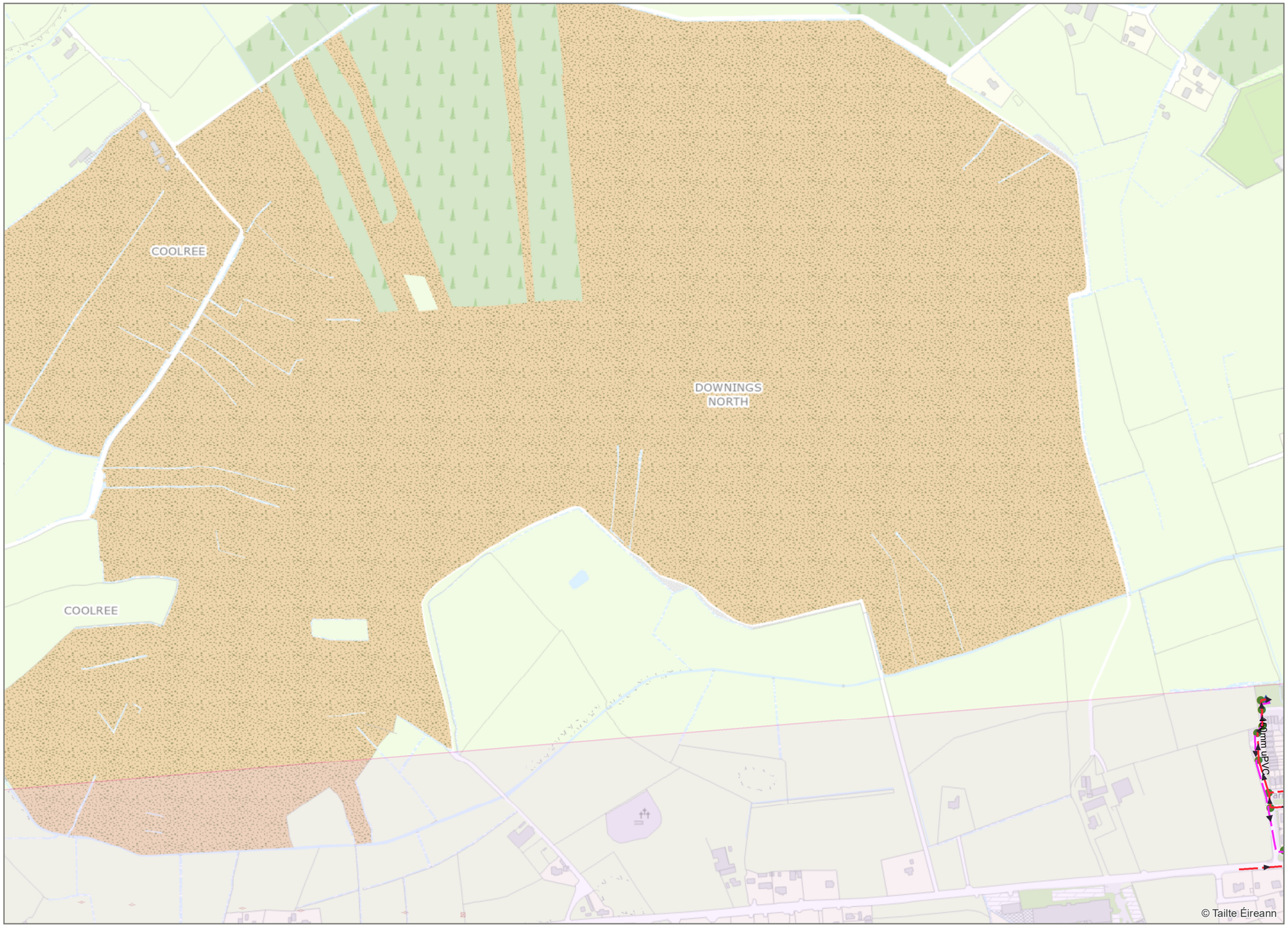
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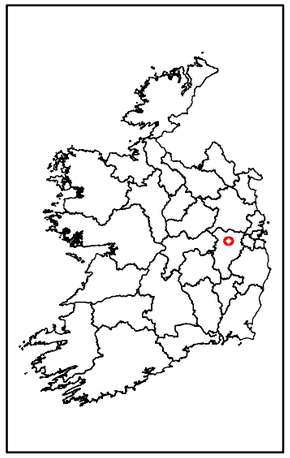
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Sewer Network - E6



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Sewer Gravity Mains (Irish Water owned)

Liquid Type

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid Type

Foul

Sewer Manholes

Manhole Type

Standard

Pump station

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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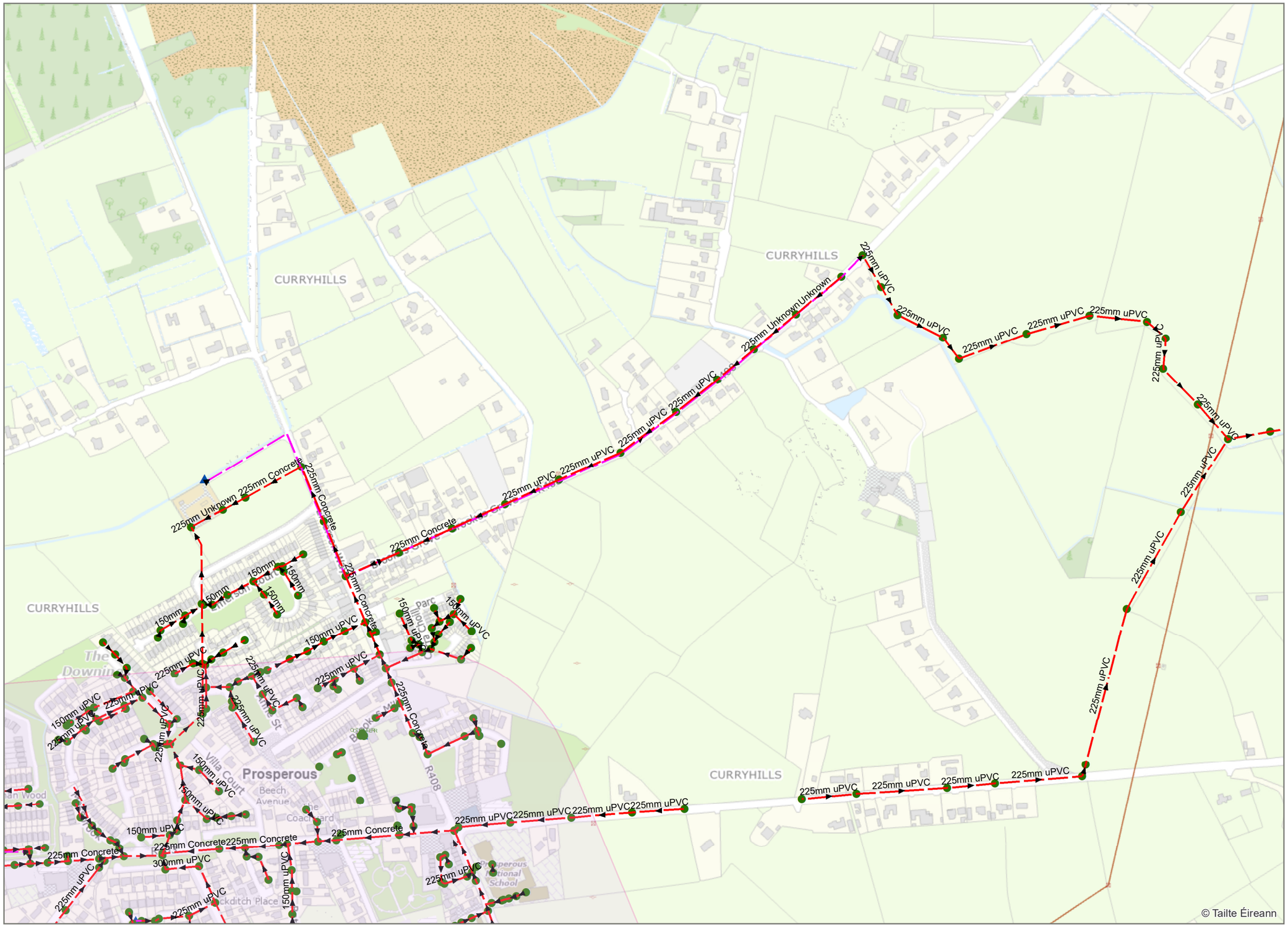
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Sewer Network - E11



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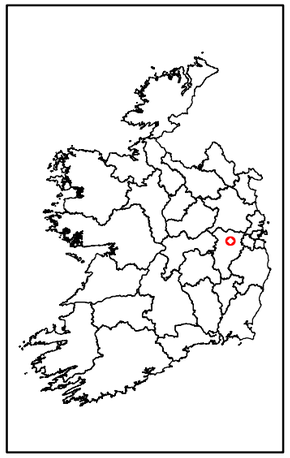
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Sewer Network - E12

Uisce Éireann
Irish Water



Legend

Proposed Development

Sewer Gravity Mains (Irish Water owned)

Liquid

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid

Foul

Sewer

Manhole

Standard

Other;

Pump

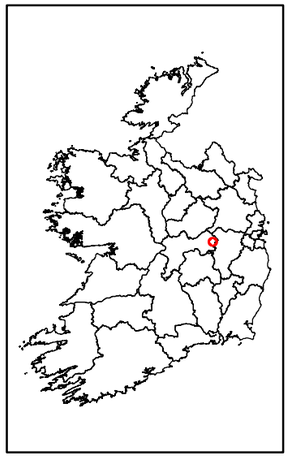
0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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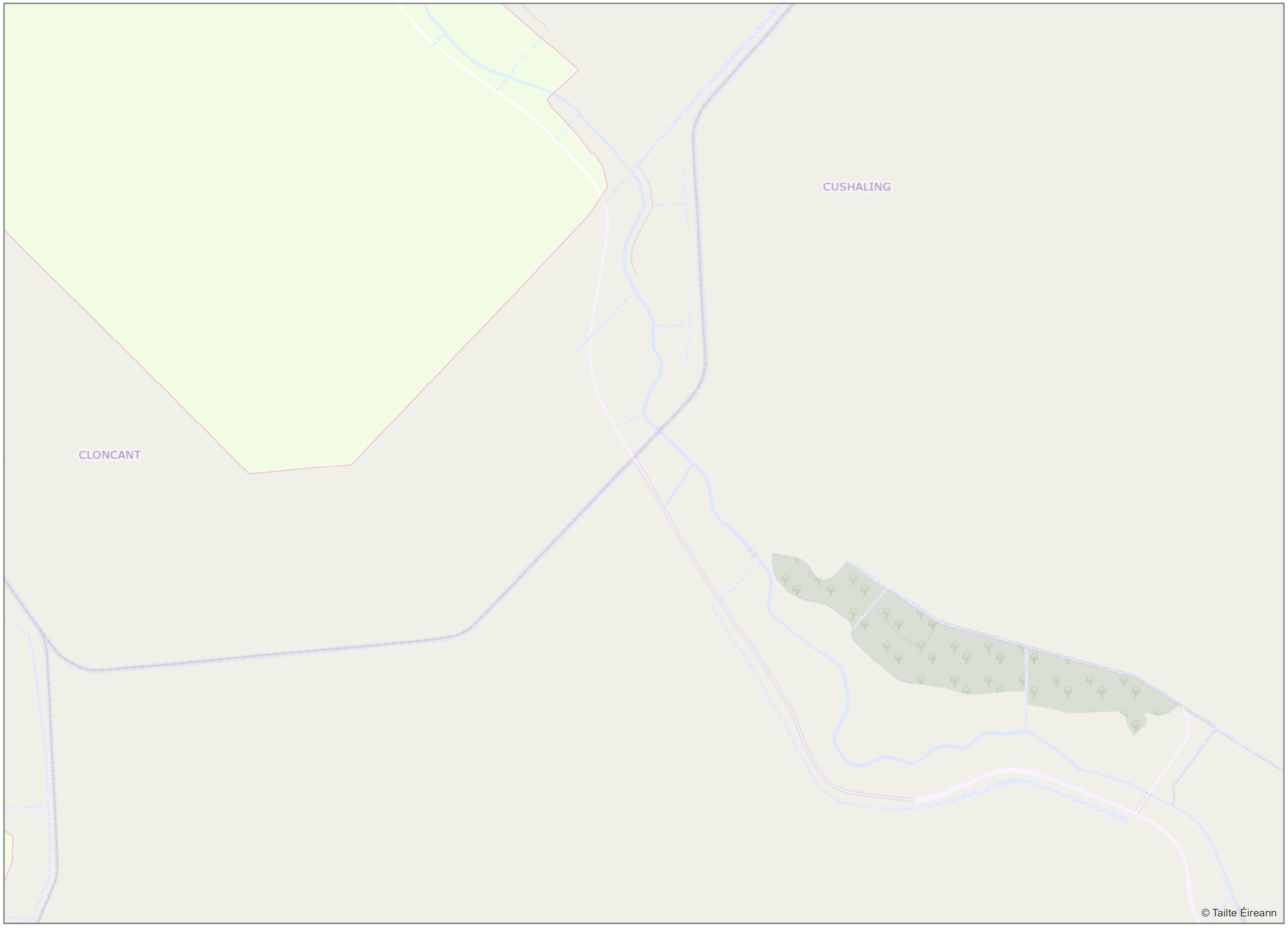
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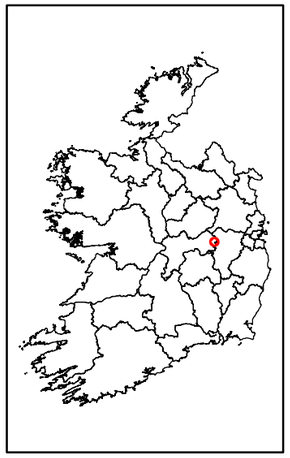
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Sewer Network - F1





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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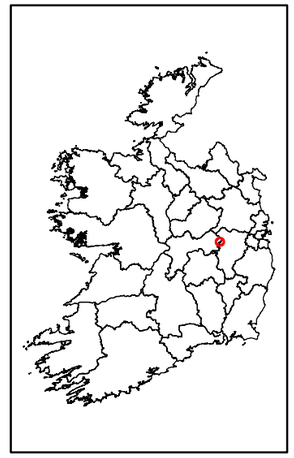
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Sewer Network - F2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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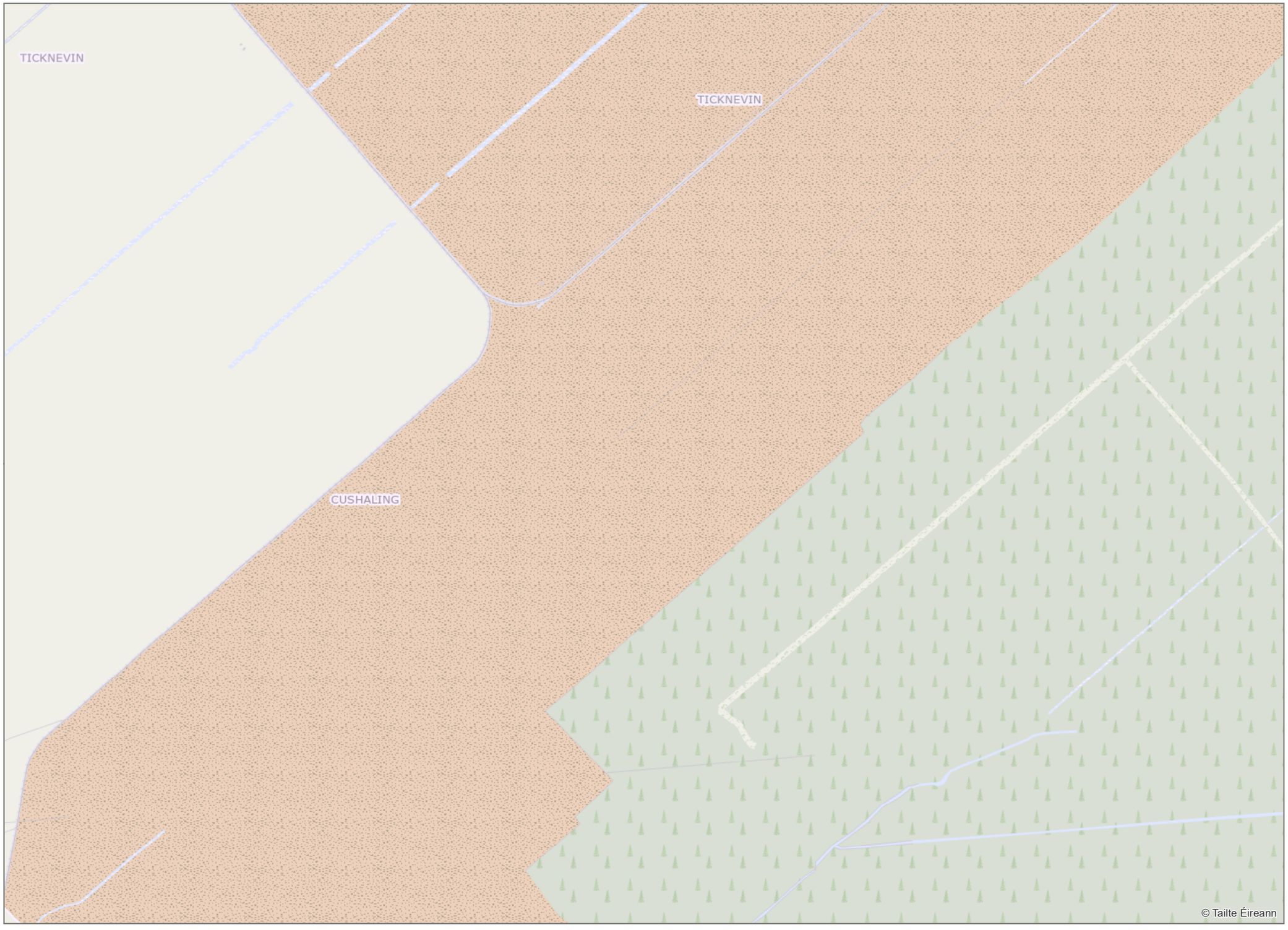
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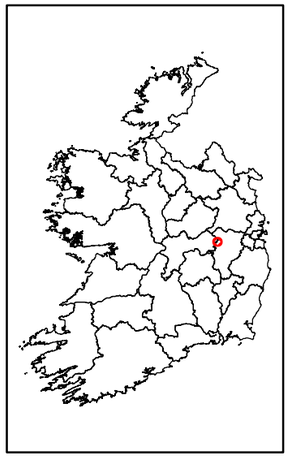
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Sewer Network - F3



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180
m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

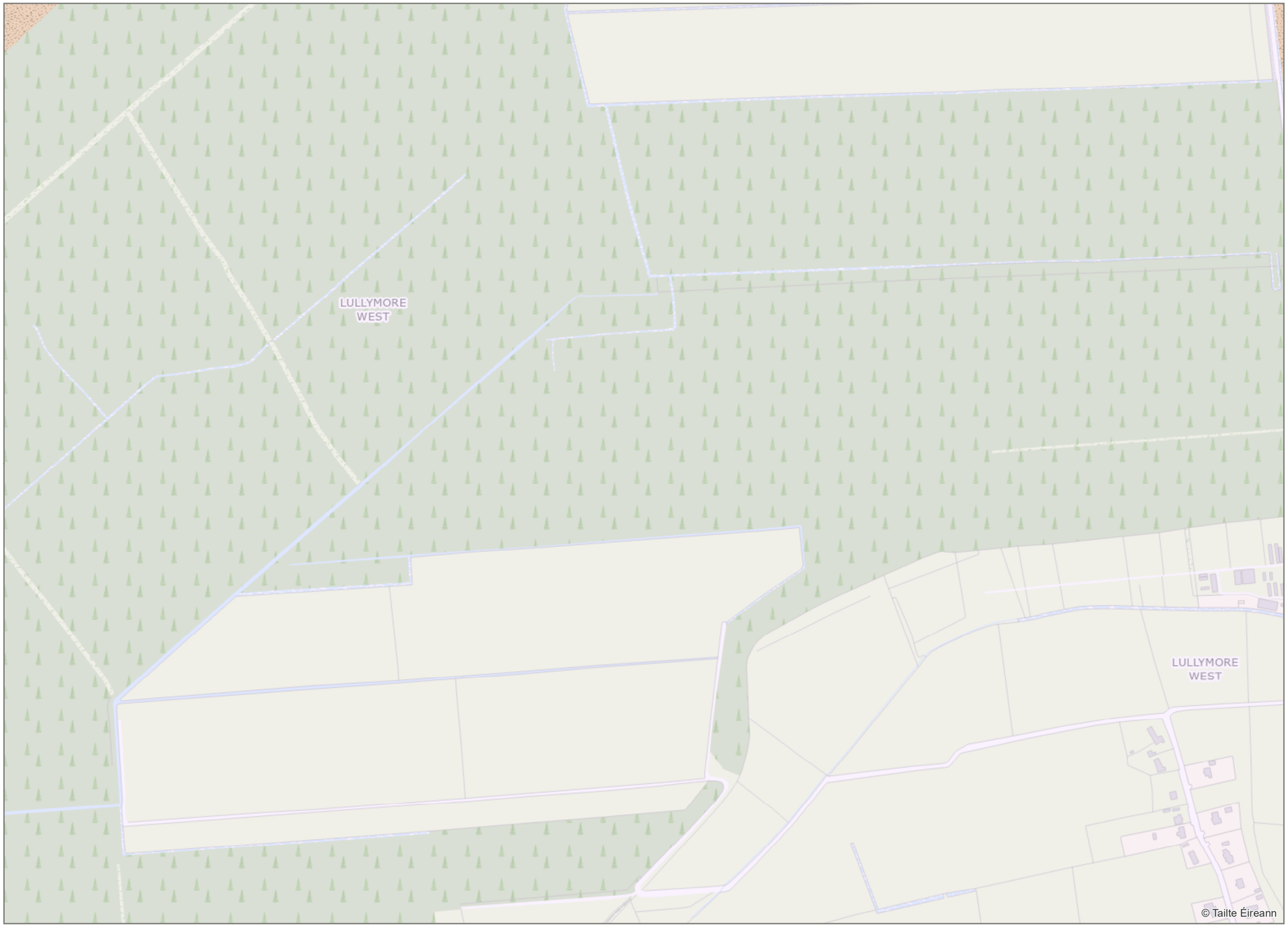
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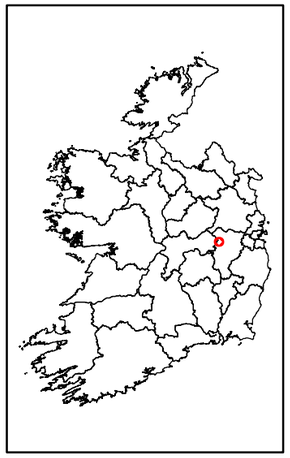
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Sewer Network - F4



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180
m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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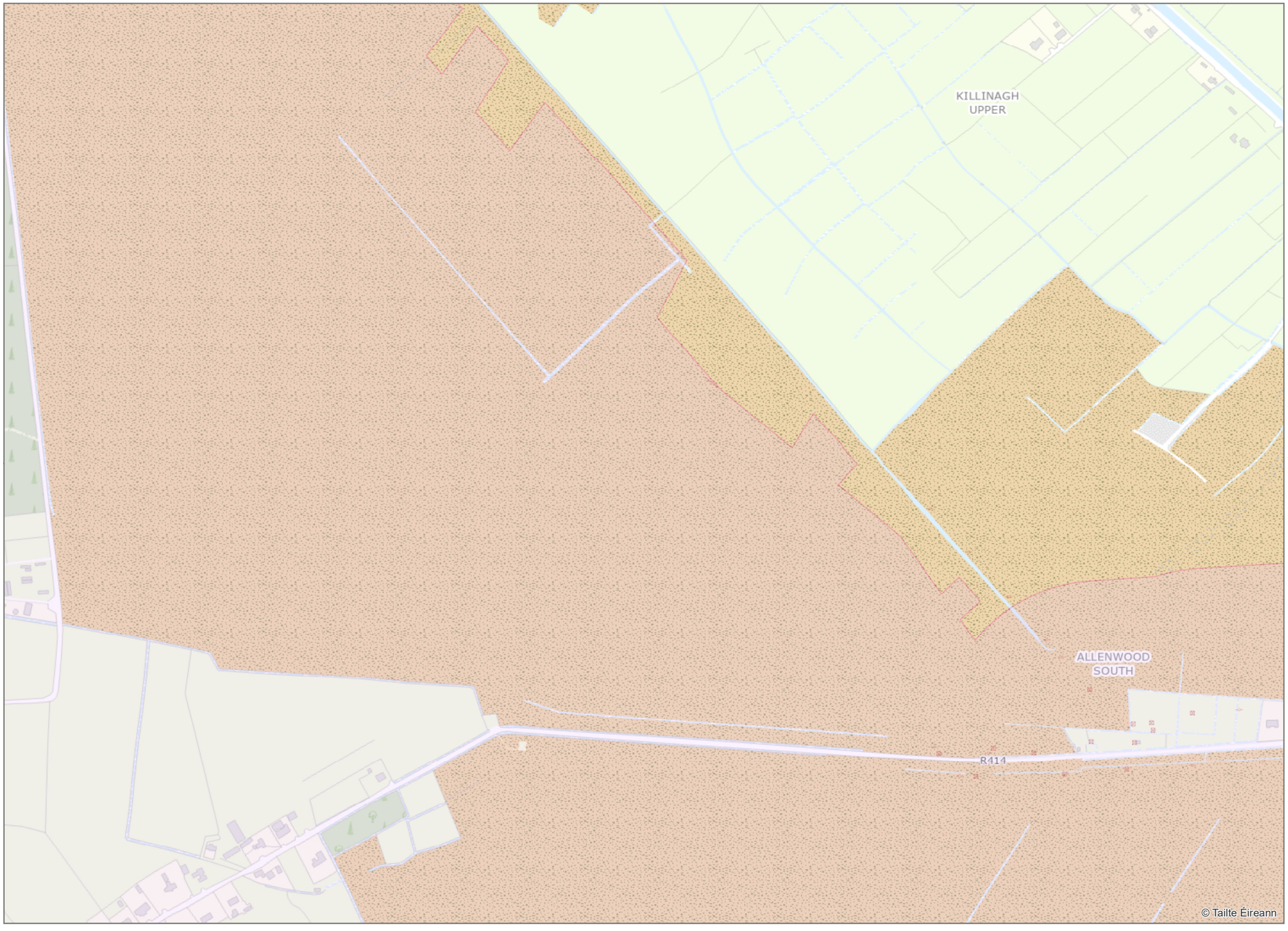
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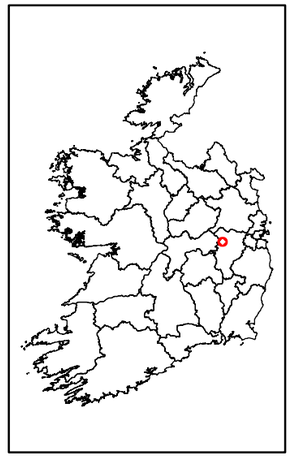
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Sewer Network - F5



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

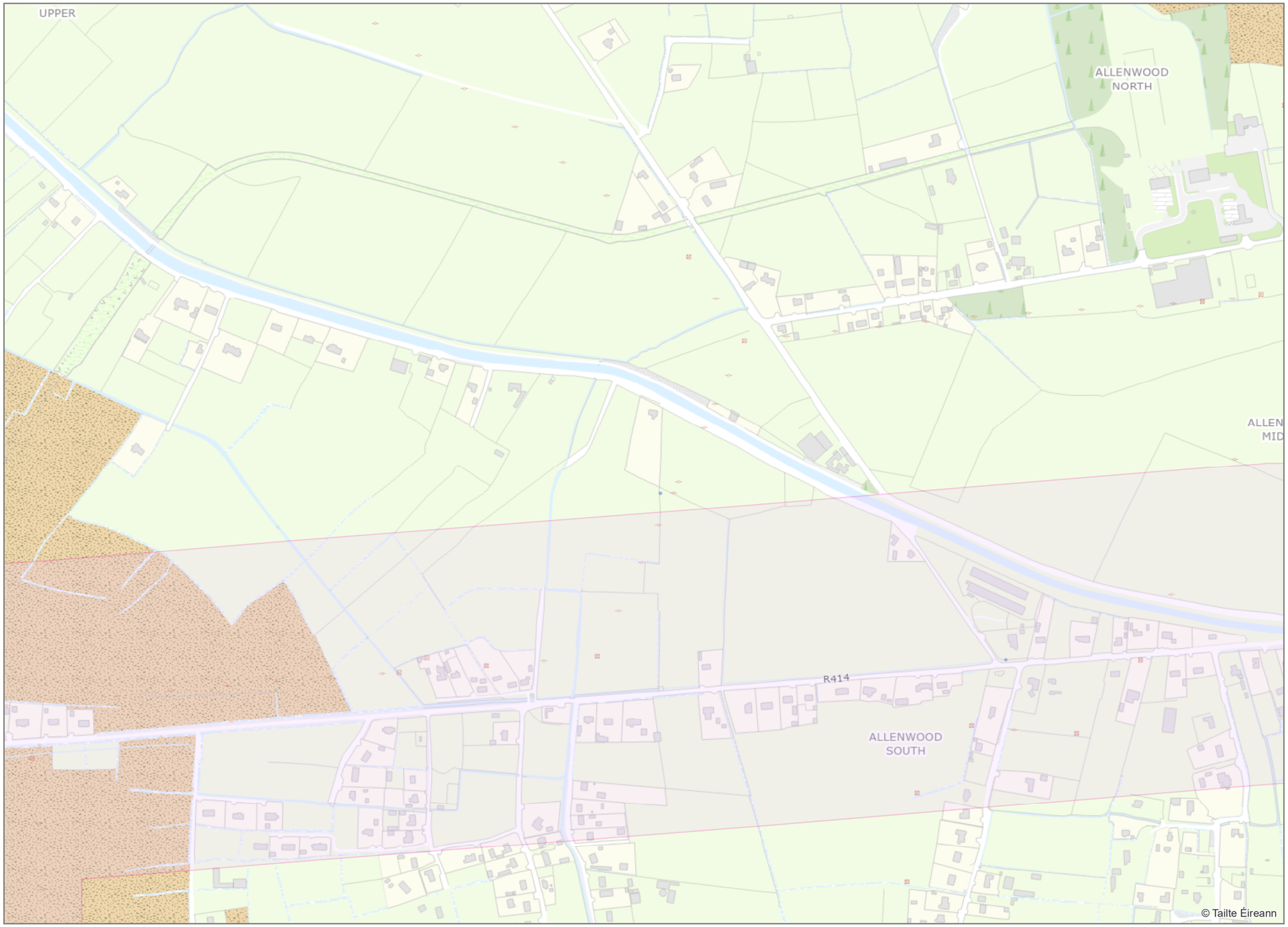
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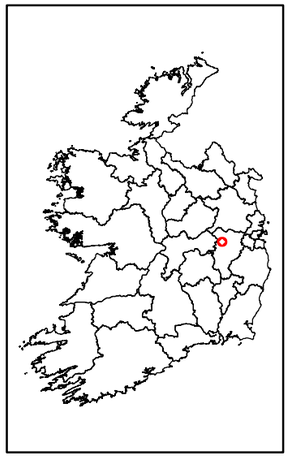
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Sewer Network - F6



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

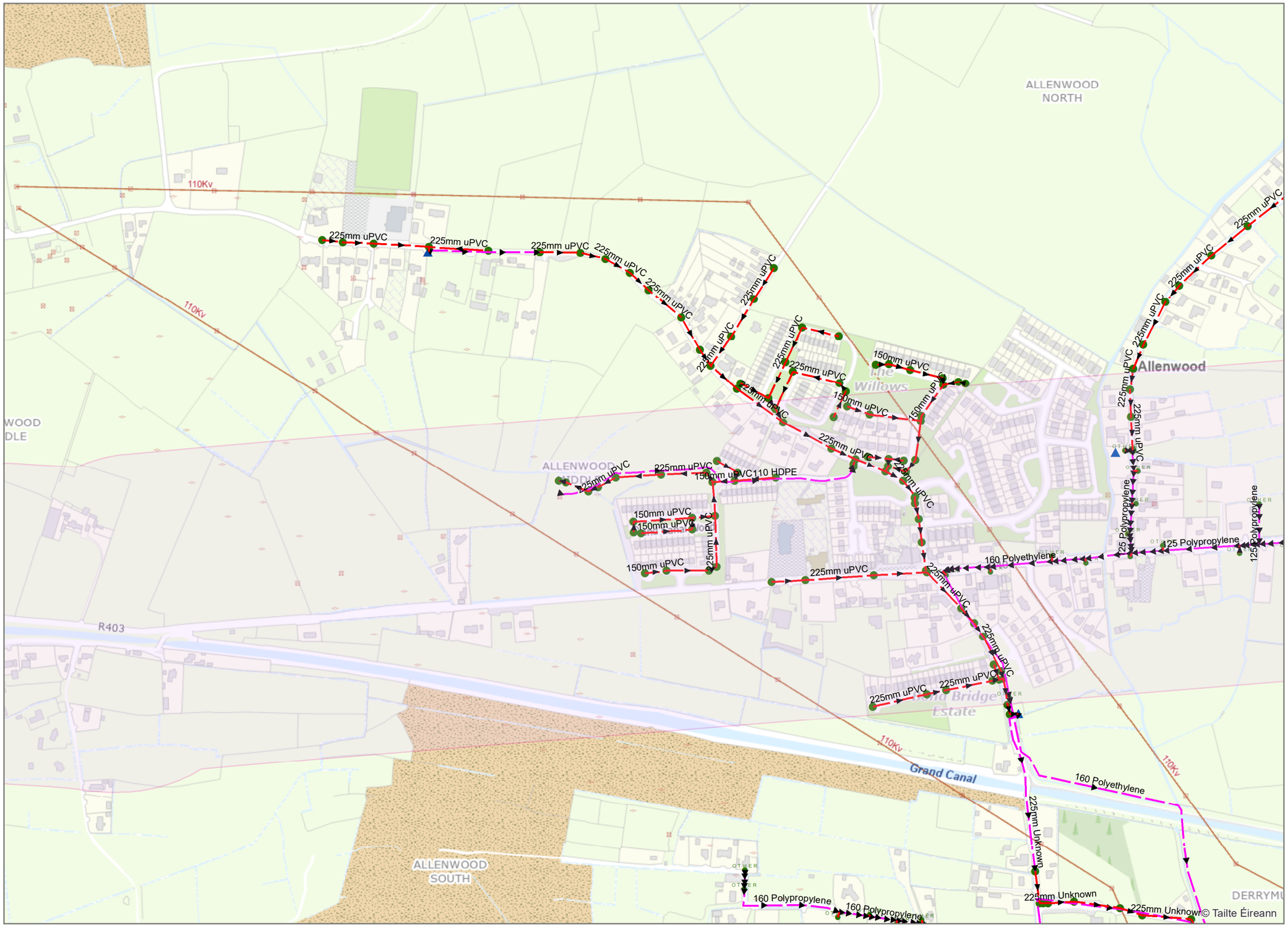
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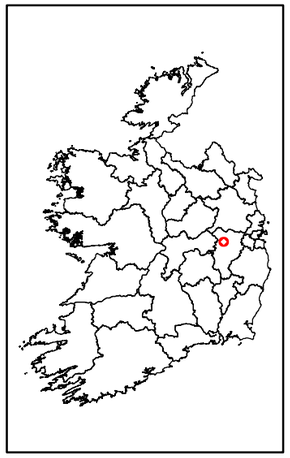
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Sewer Network - F7





Legend

Proposed Development

Sewer Gravity Mains (Irish Water owned)

Liquid

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid

Foul

Sewer

Manhole

Standard

Other;

Pump

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

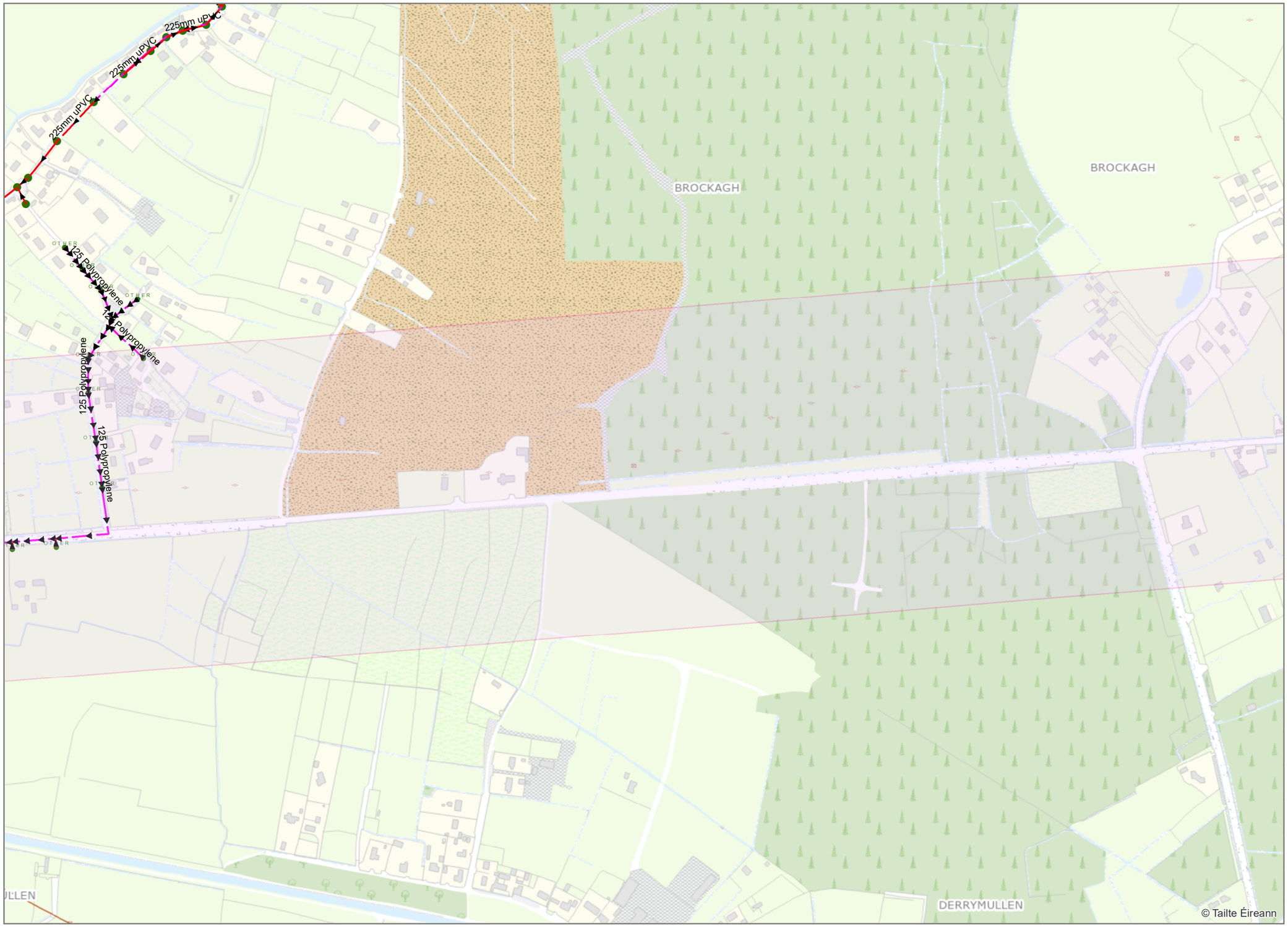
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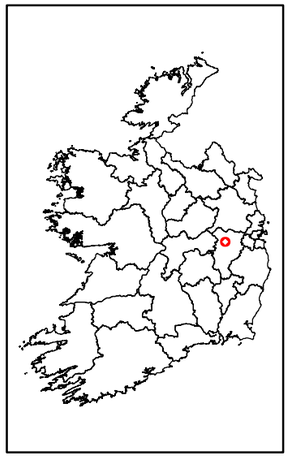
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Sewer Network - F8





Legend

Proposed Development

Sewer Gravity Mains (Irish Water owned)

Liquid

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid

Foul

Sewer

Manhole

Standard

Other;

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

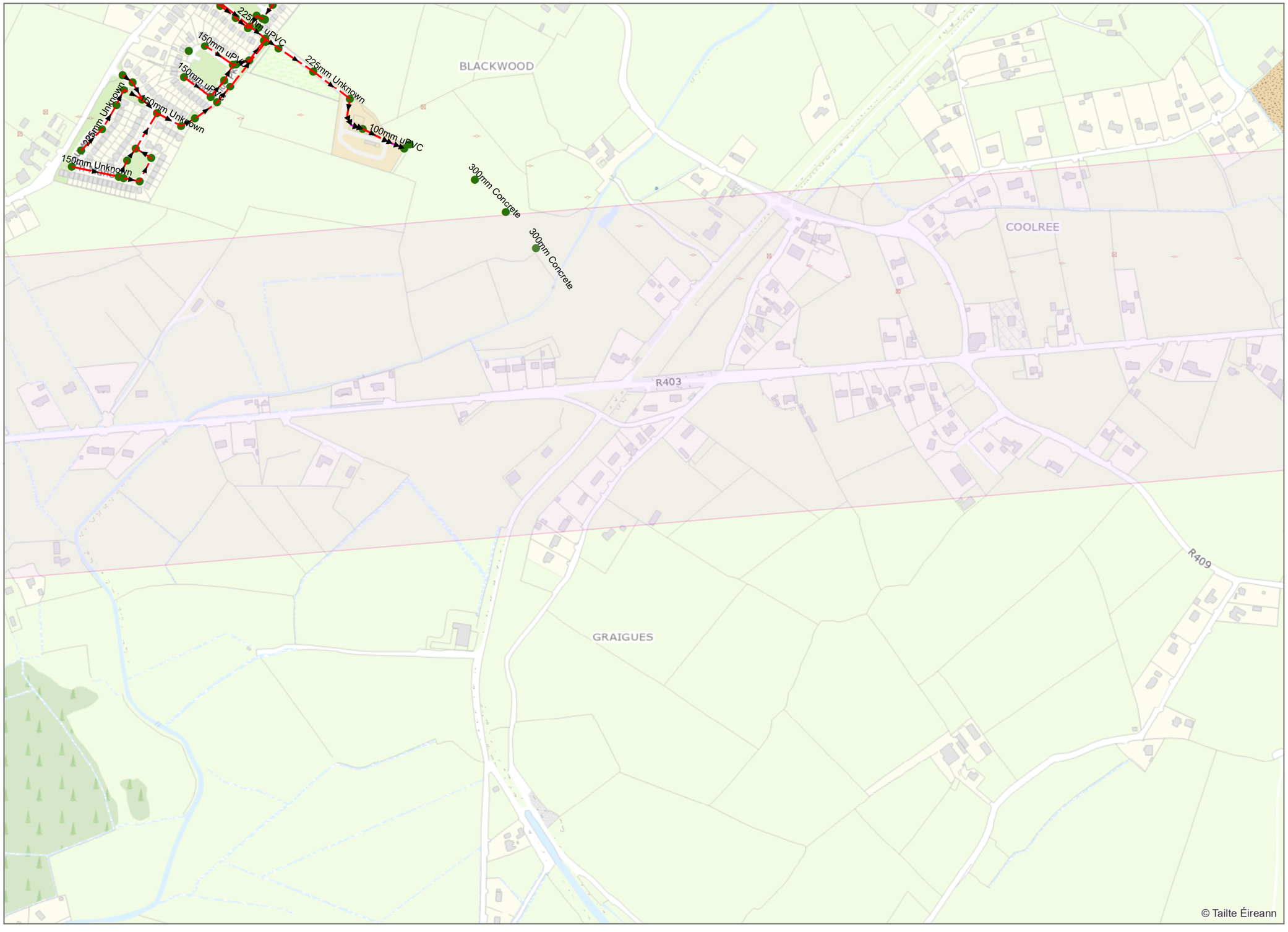
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Sewer Network - F9



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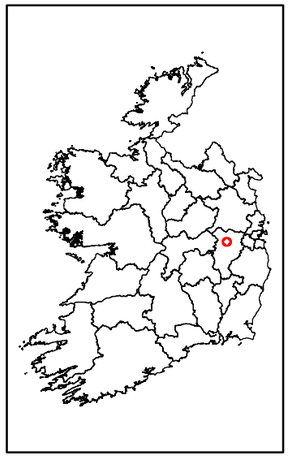
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Sewer Network - F10

Uisce Éireann
Irish Water



Legend

Proposed Development

Sewer Gravity Mains (Irish Water owned)

Liquid

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid

Foul

Sewer

Manhole

Standard

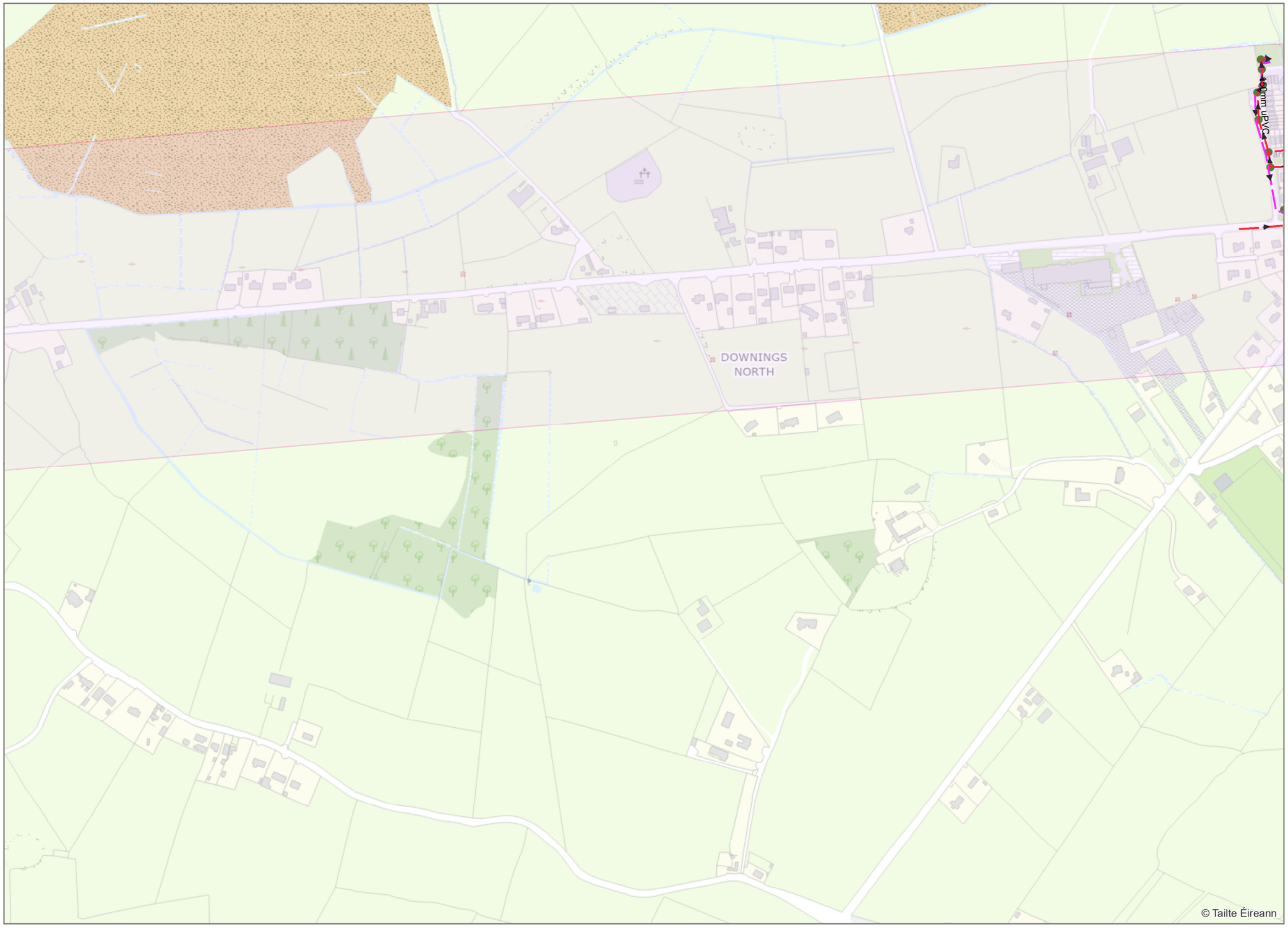
Other;

0 45 90 180 m

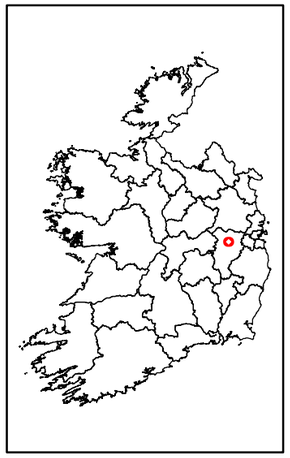
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Sewer Gravity Mains (Irish Water owned)

Liquid Type

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid Type

Foul

Sewer Manholes

Manhole Type

Standard

Pump station

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
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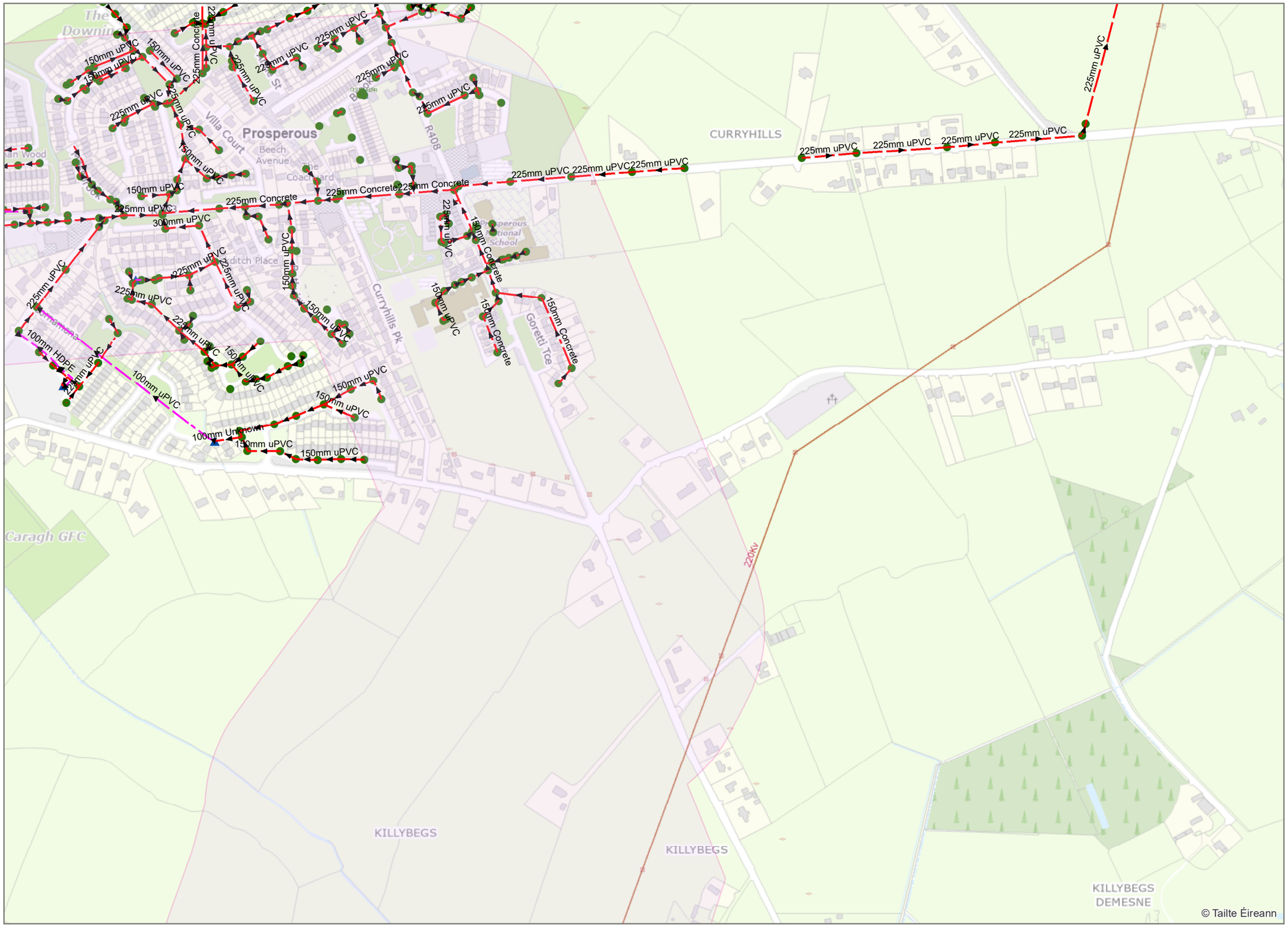
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Sewer Network - F11



N

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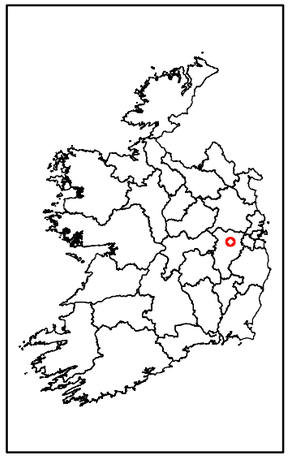
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Sewer Network - F12

Uisce Éireann
Irish Water



Legend

Proposed Development

Sewer Gravity Mains (Irish Water owned)

Liquid

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid

Foul

Sewer

Manhole

Standard

OTHER Other;

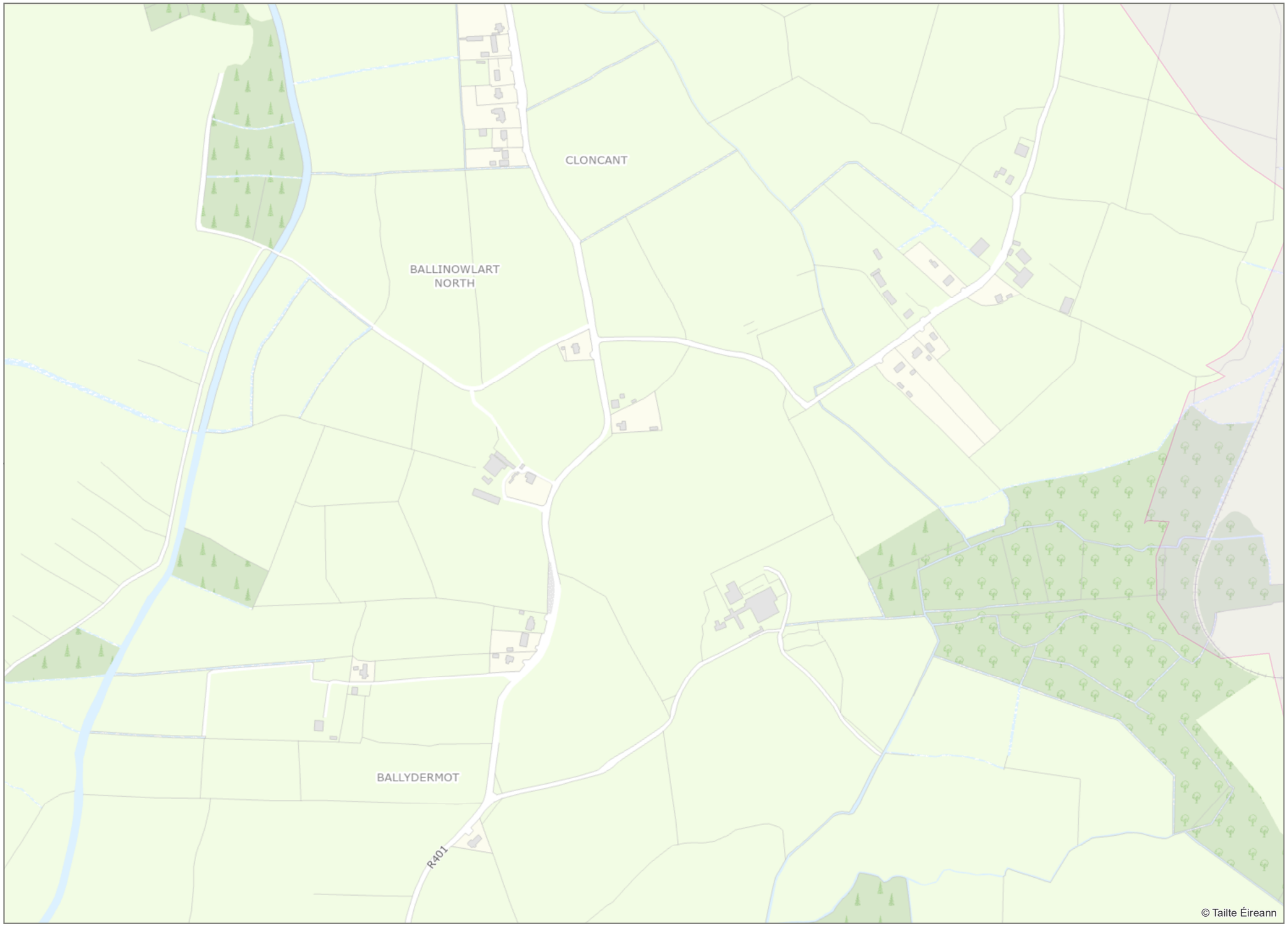
Pump

0 45 90 180 m

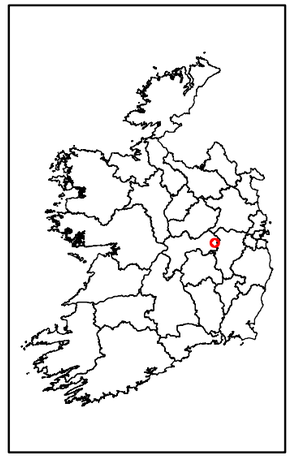
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Projection: Transverse Mercator

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Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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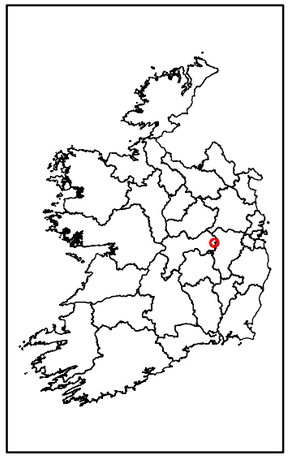
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Sewer Network - G1





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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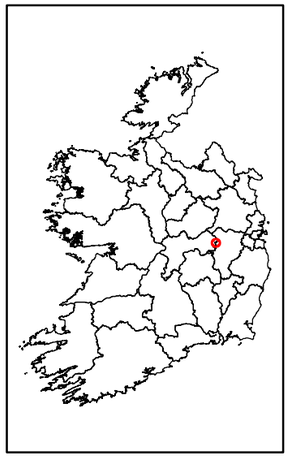
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Sewer Network - G2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

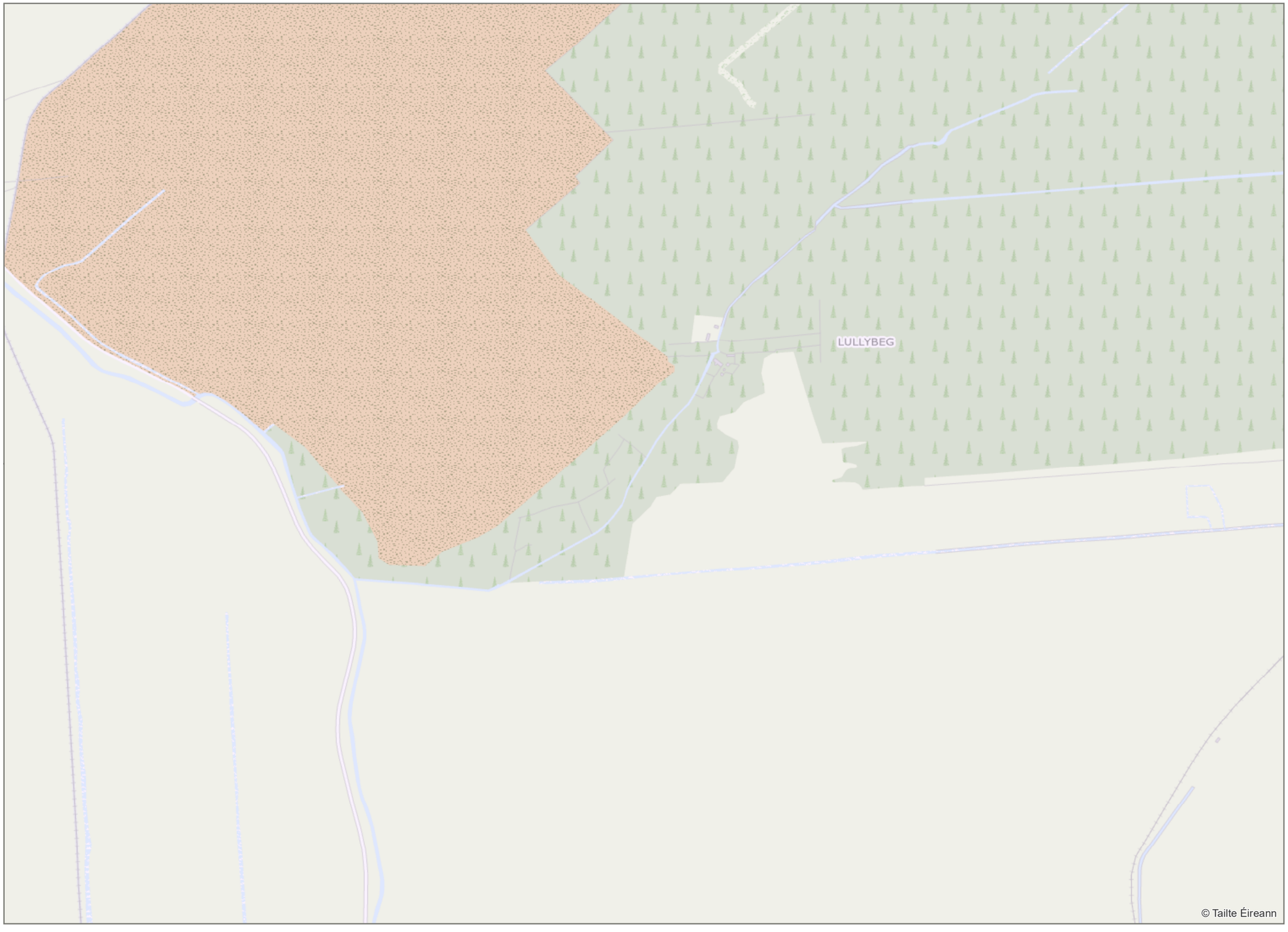
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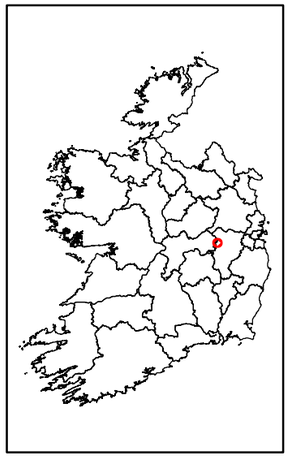
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Sewer Network - G3





Uisce Éireann
Irish Water

Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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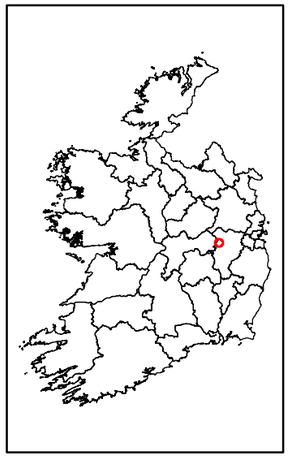
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Sewer Network - G4



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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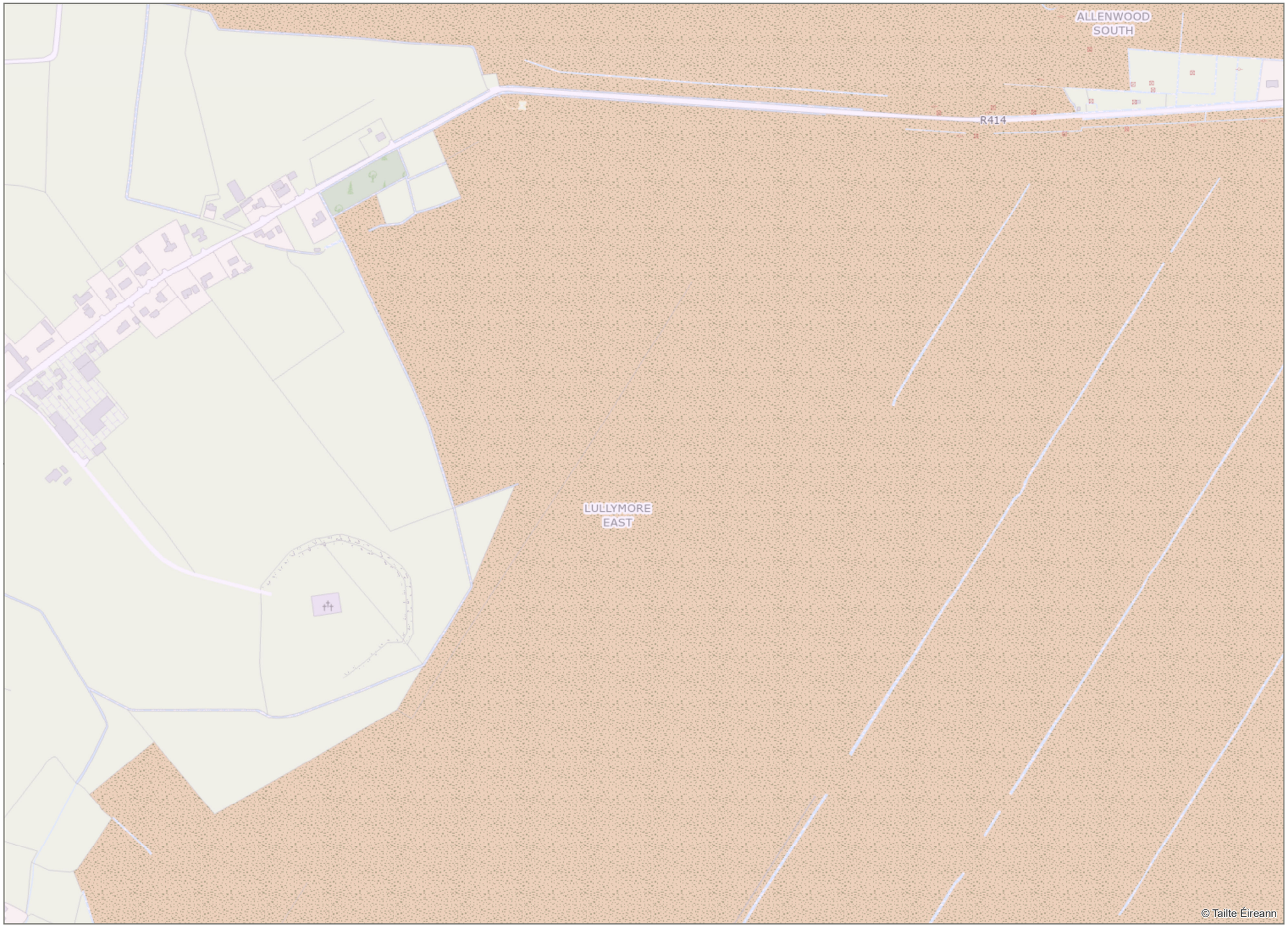
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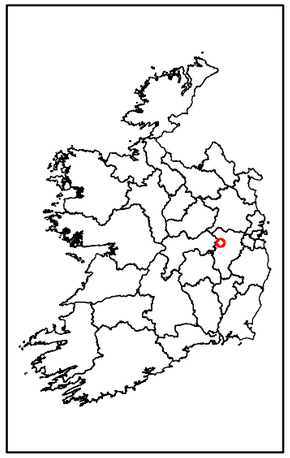
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Sewer Network - G5



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

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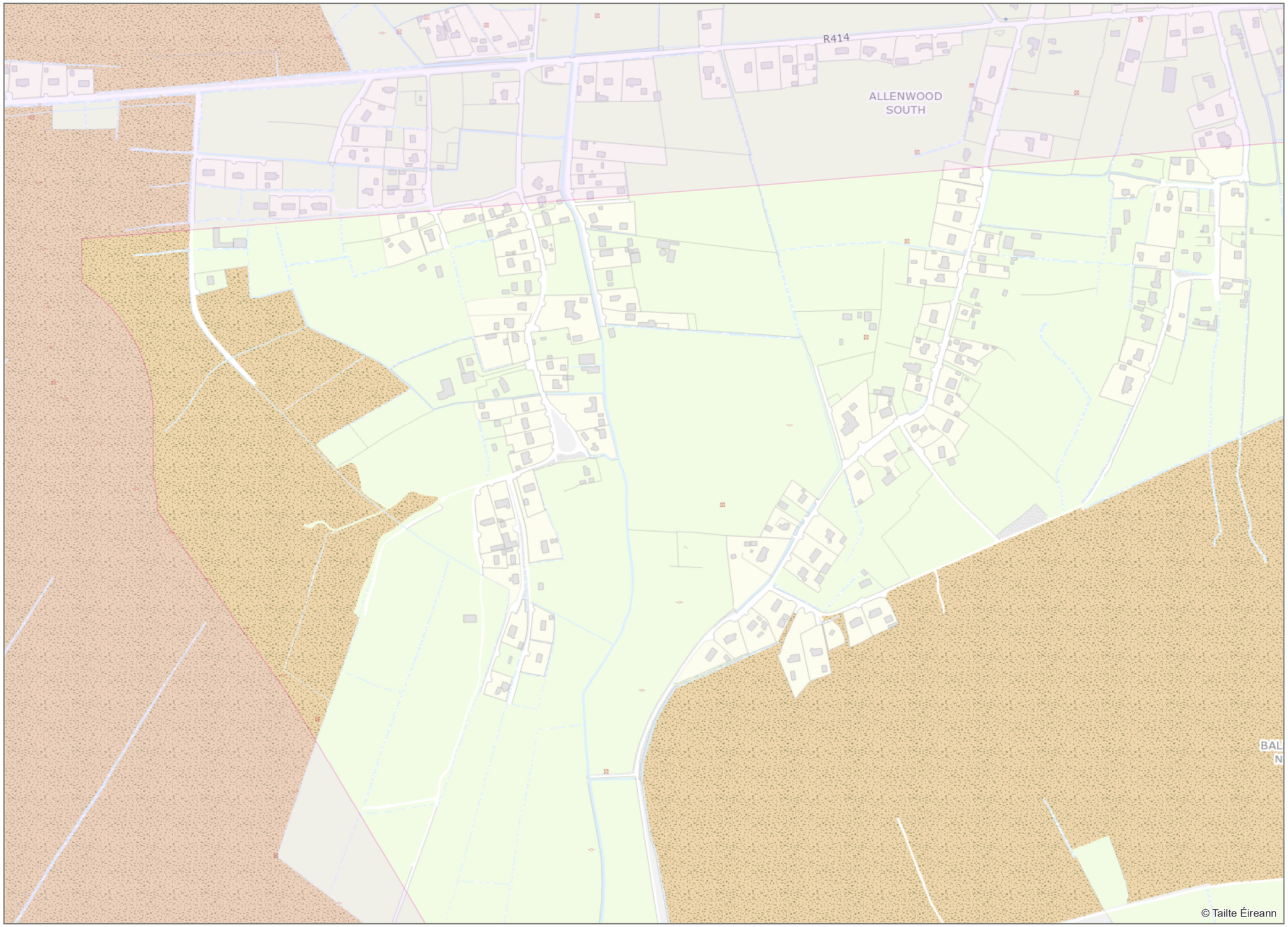
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Sewer Network - G6



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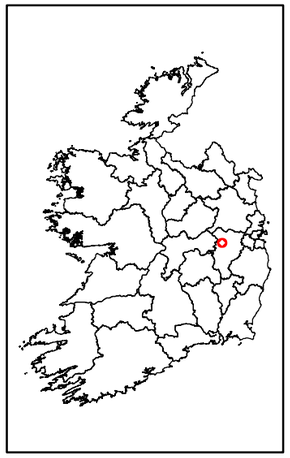
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Sewer Network - G7

Uisce Éireann
Irish Water



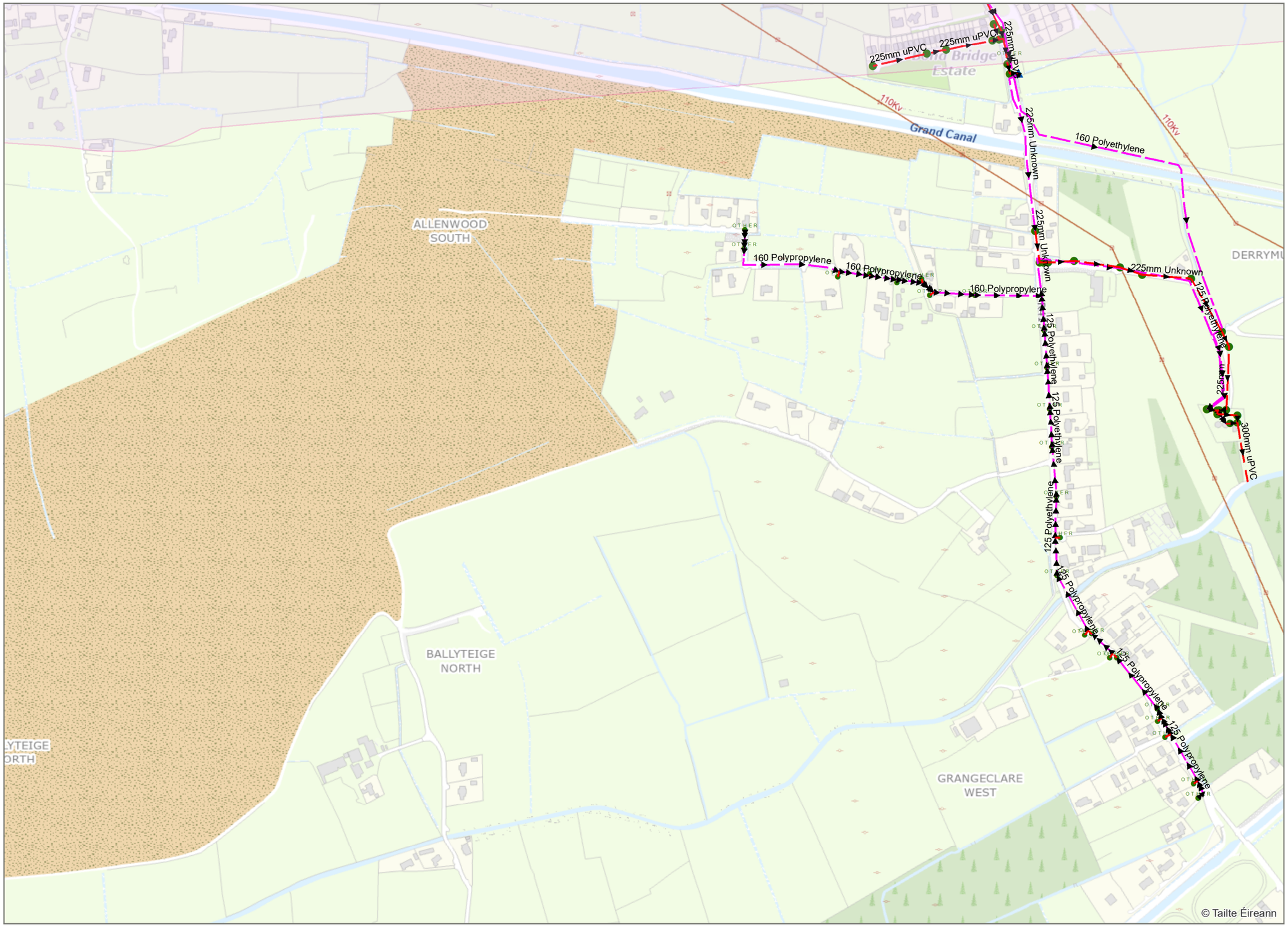
Legend

Proposed Development Boundary

0 45 90 180
m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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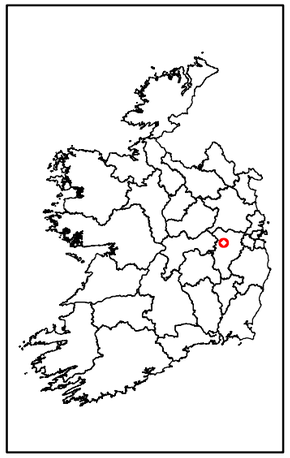
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Sewer Network - G8

Uisce Éireann
Irish Water



Legend

Proposed Development

Sewer Gravity Mains (Irish Water owned)

Liquid

Foul

Sewer Pressurized Mains (Irish Water owned)

Liquid

Foul

Sewer

Manhole

Standard

Other;

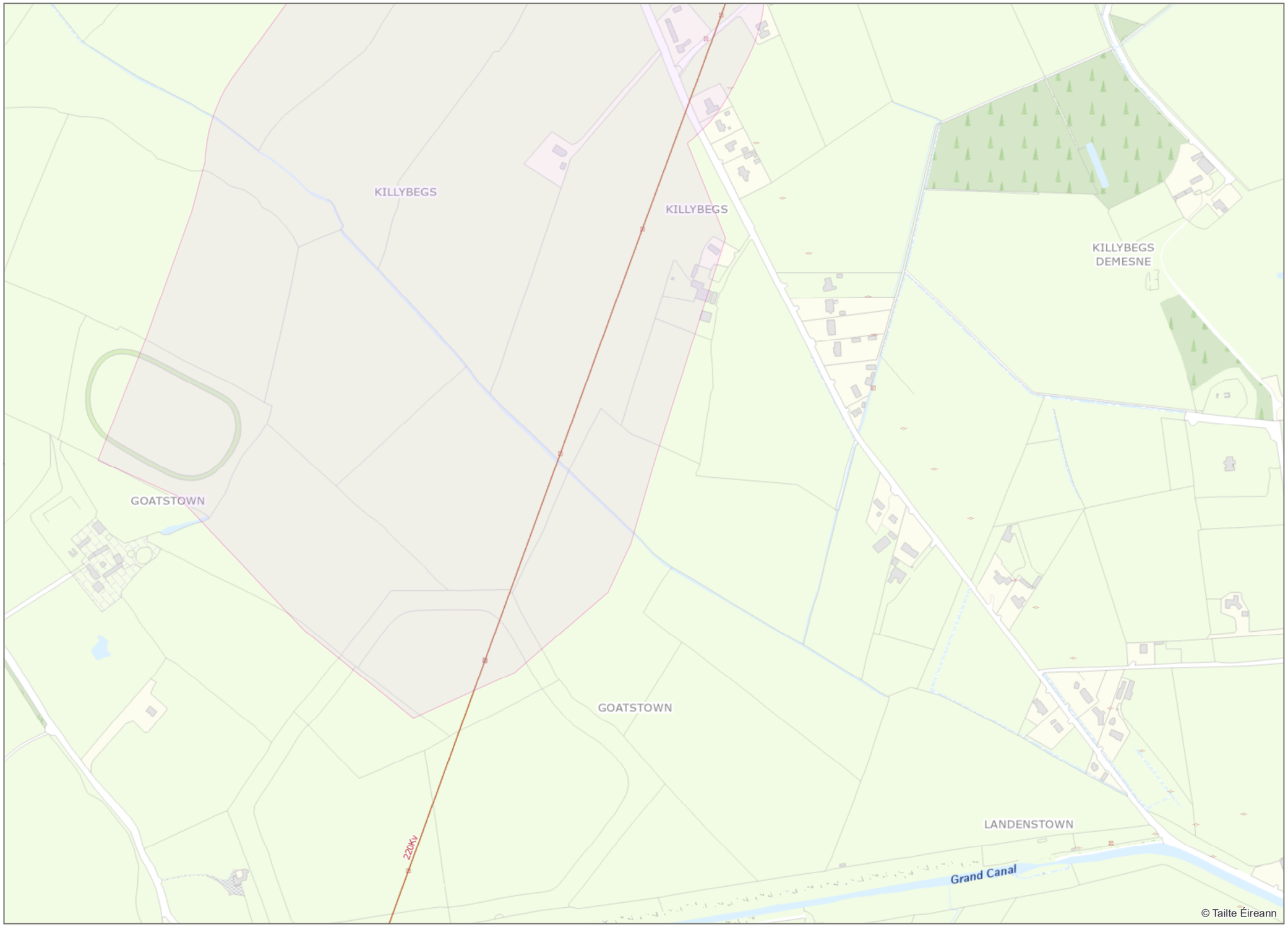
Pump

0 45 90 180 m

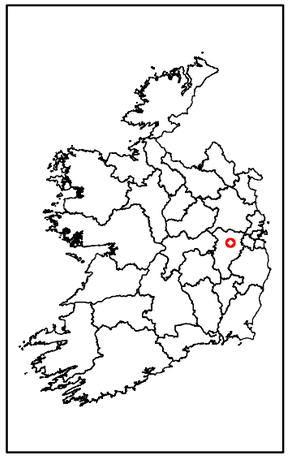
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Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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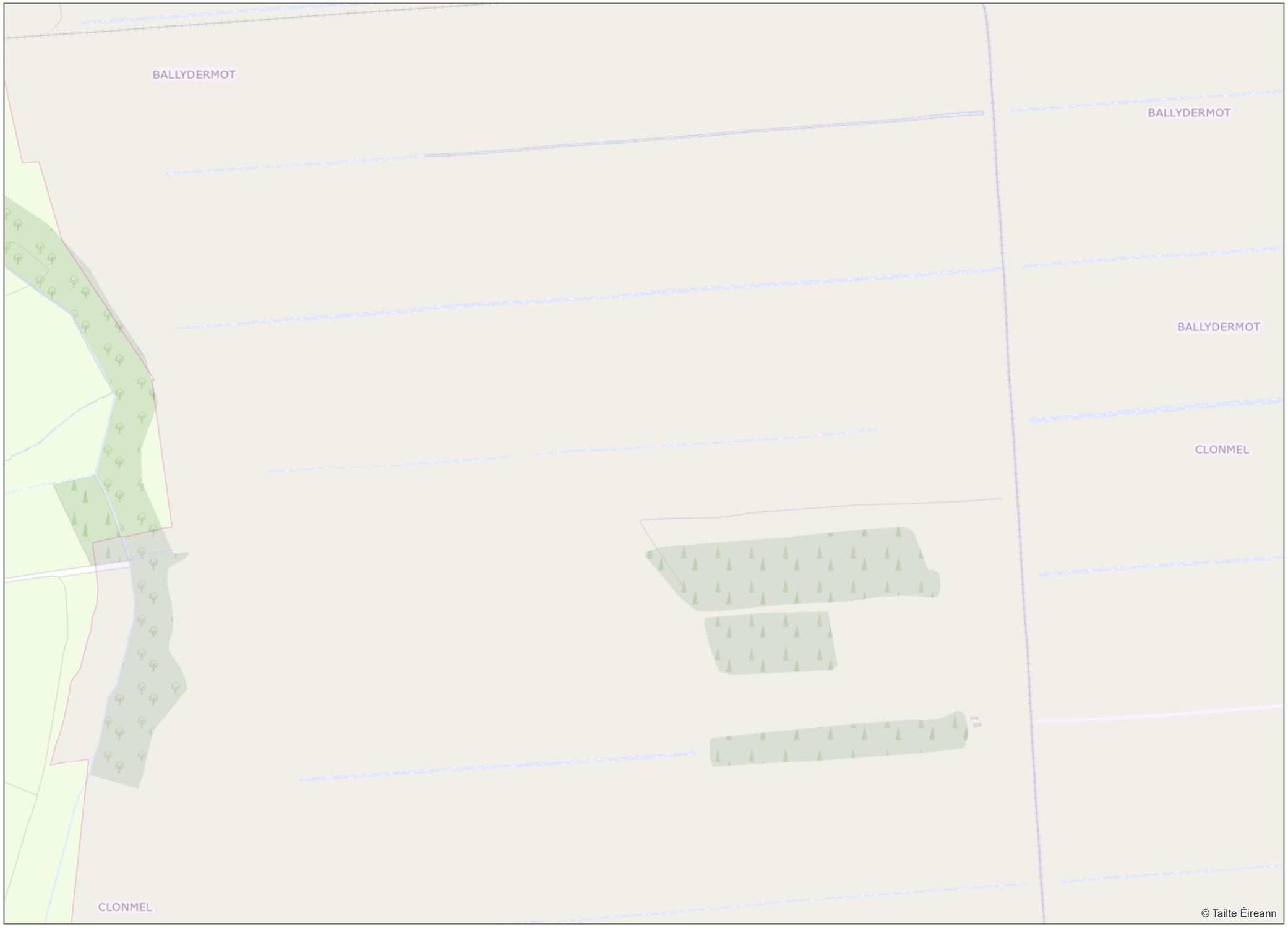
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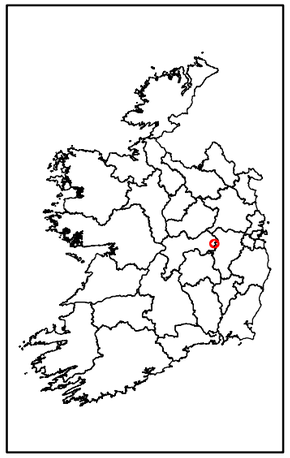
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Sewer Network - G12



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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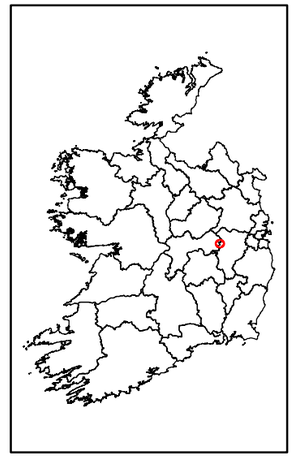
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Sewer Network - H2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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Sewer Network - H3



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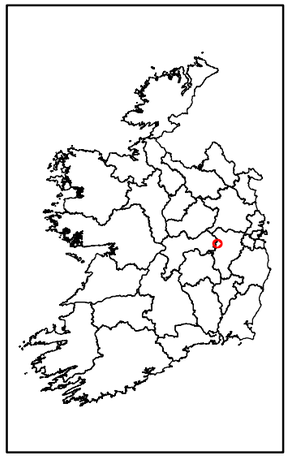
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Sewer Network - H4

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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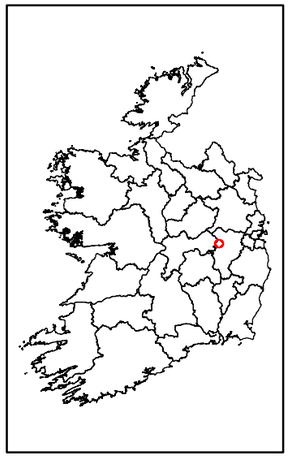
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Sewer Network - H5

Uisce Éireann
Irish Water



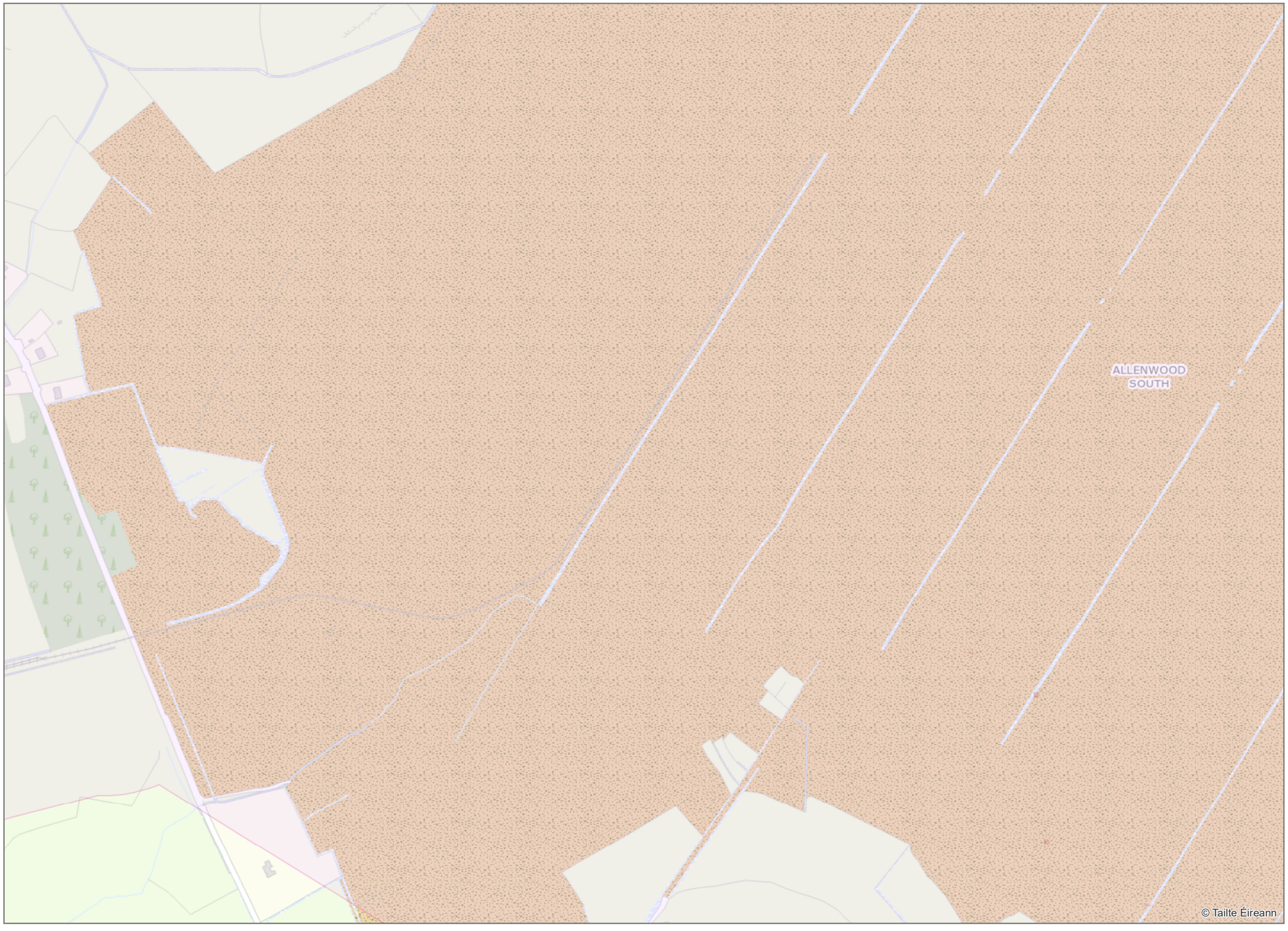
Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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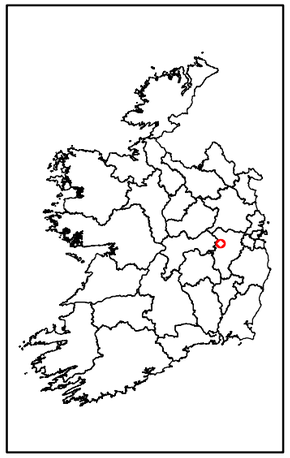
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Sewer Network - H6

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

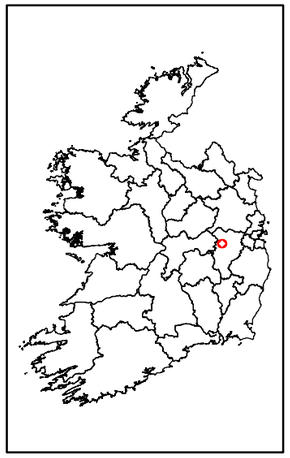
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

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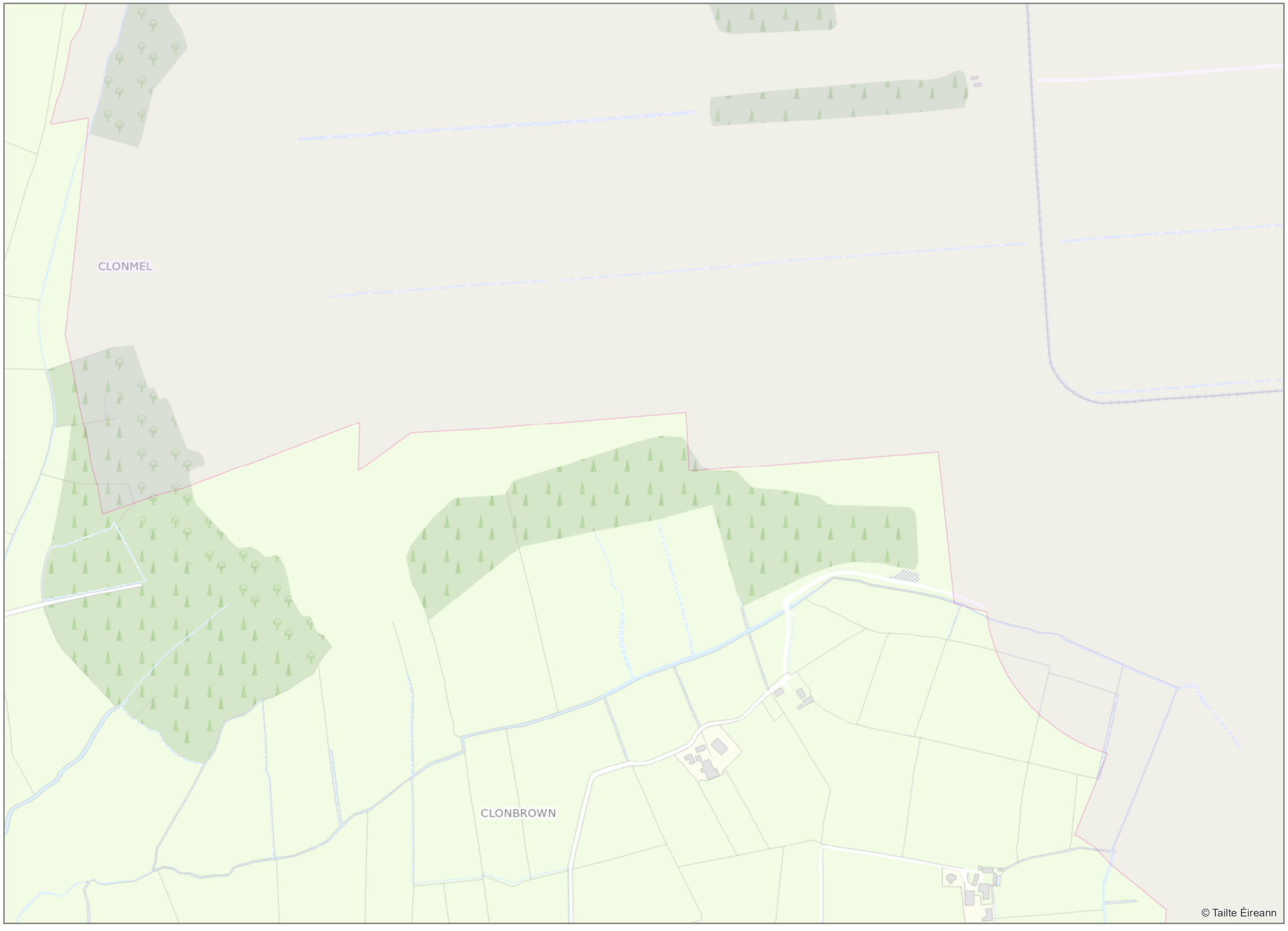
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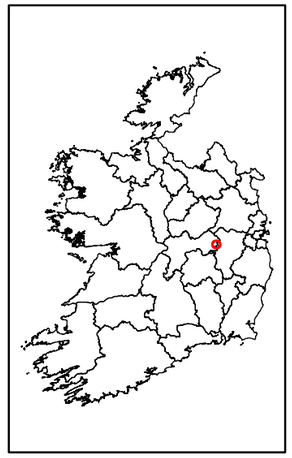
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Sewer Network - H7



Uisce Éireann
Irish Water



N

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Sewer Network - I2

Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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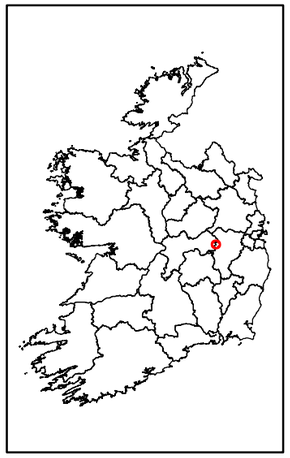
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Sewer Network - I3

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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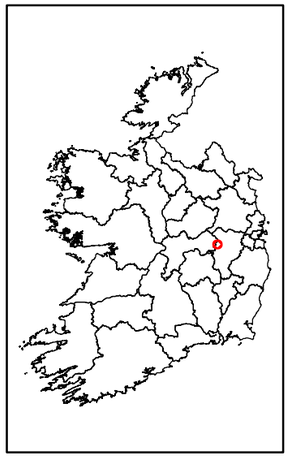
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Sewer Network - I4

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

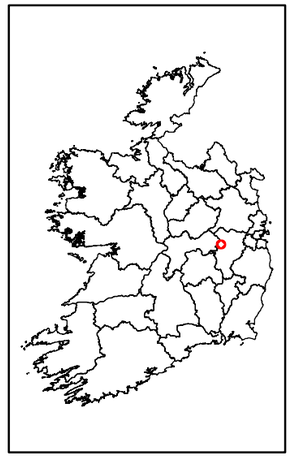
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Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

N

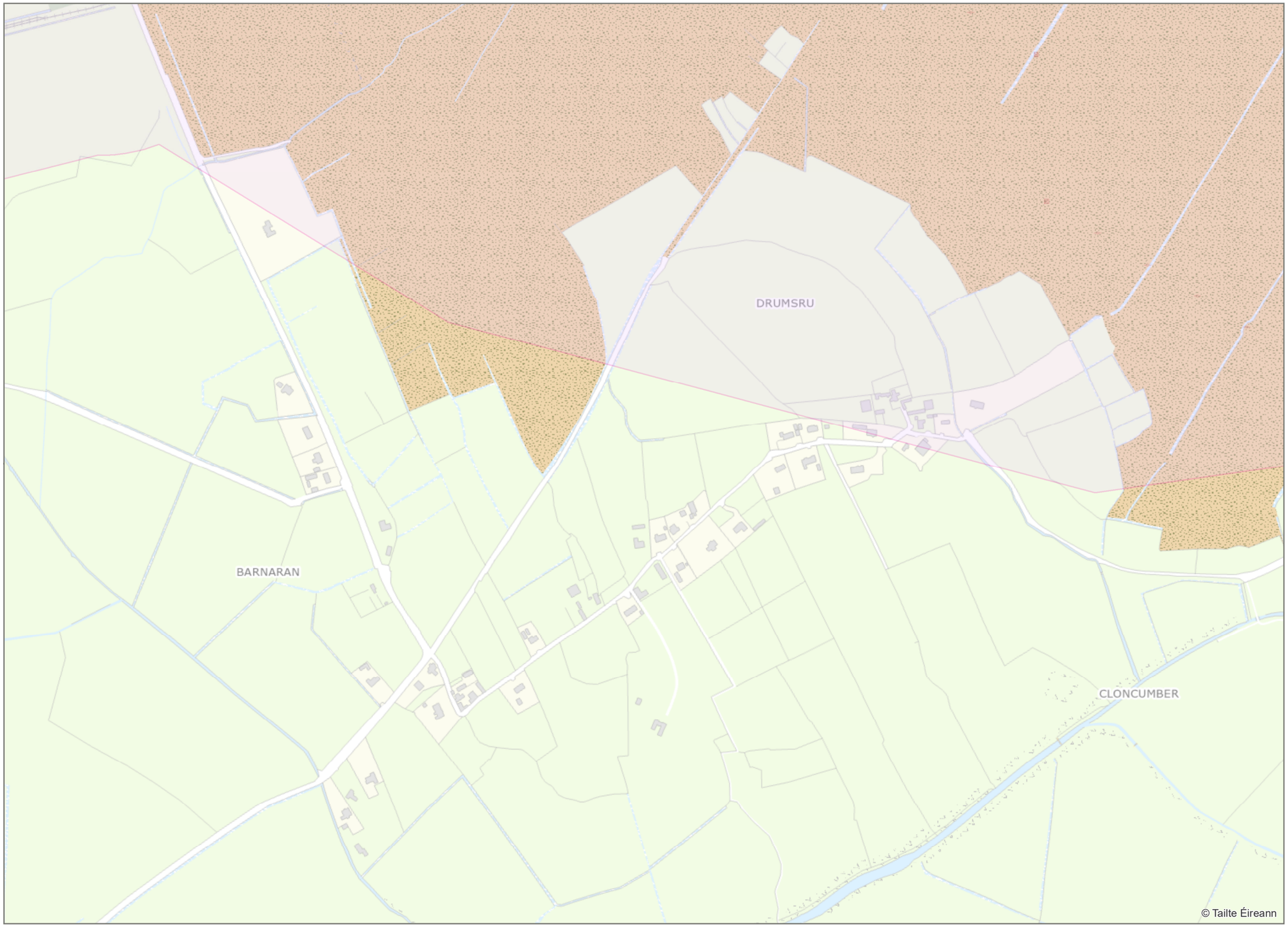
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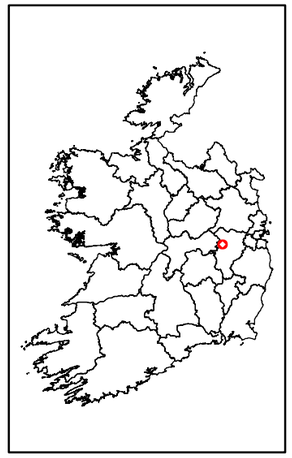
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Sewer Network - I5





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

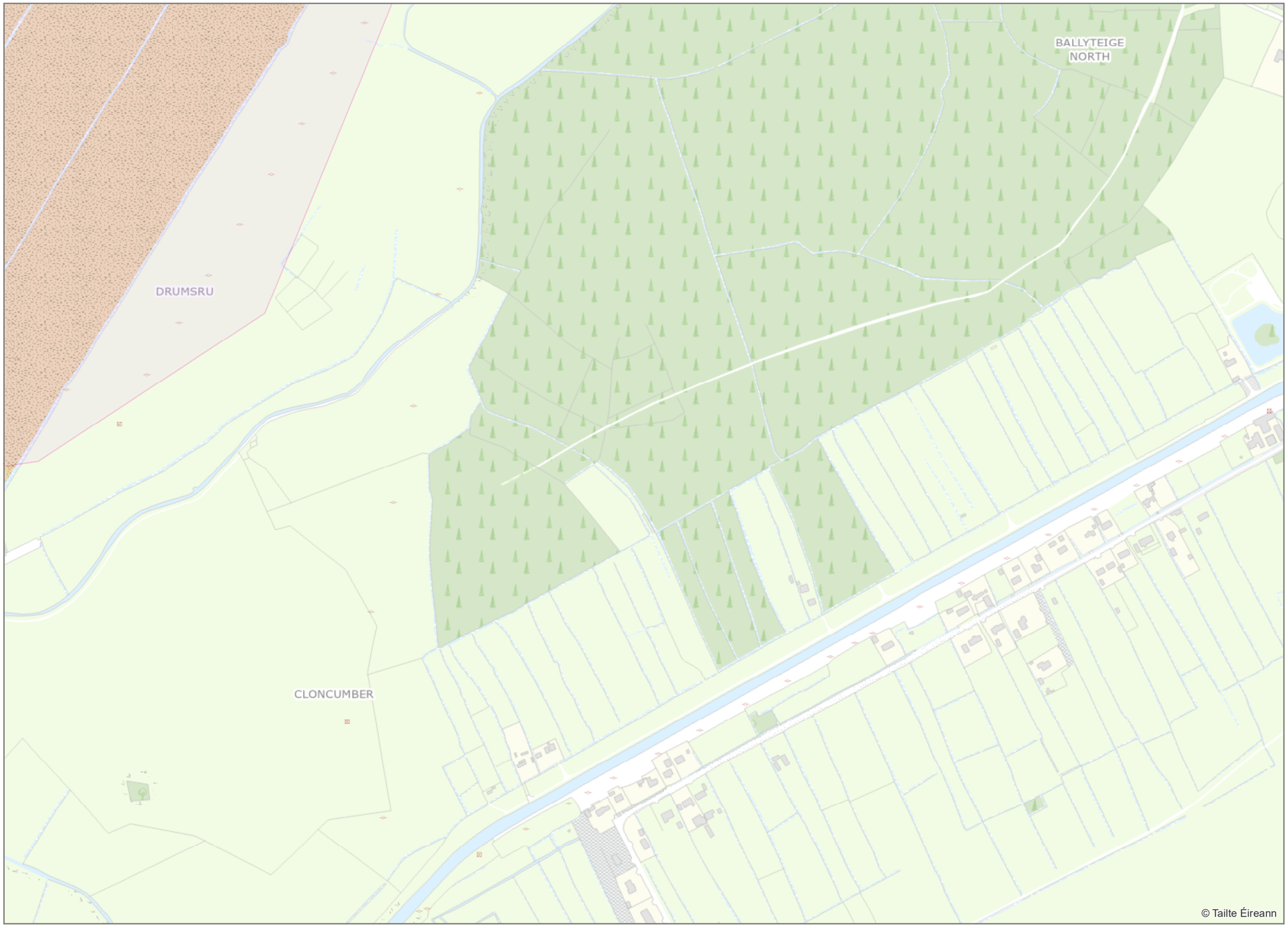
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Sewer Network - I6



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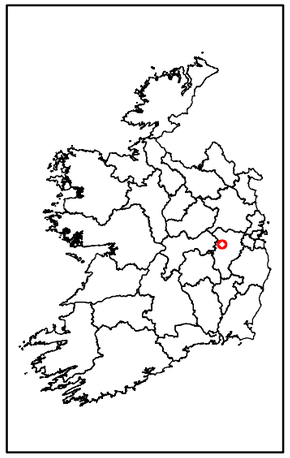
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Sewer Network - I7

Uisce Éireann
Irish Water



Legend

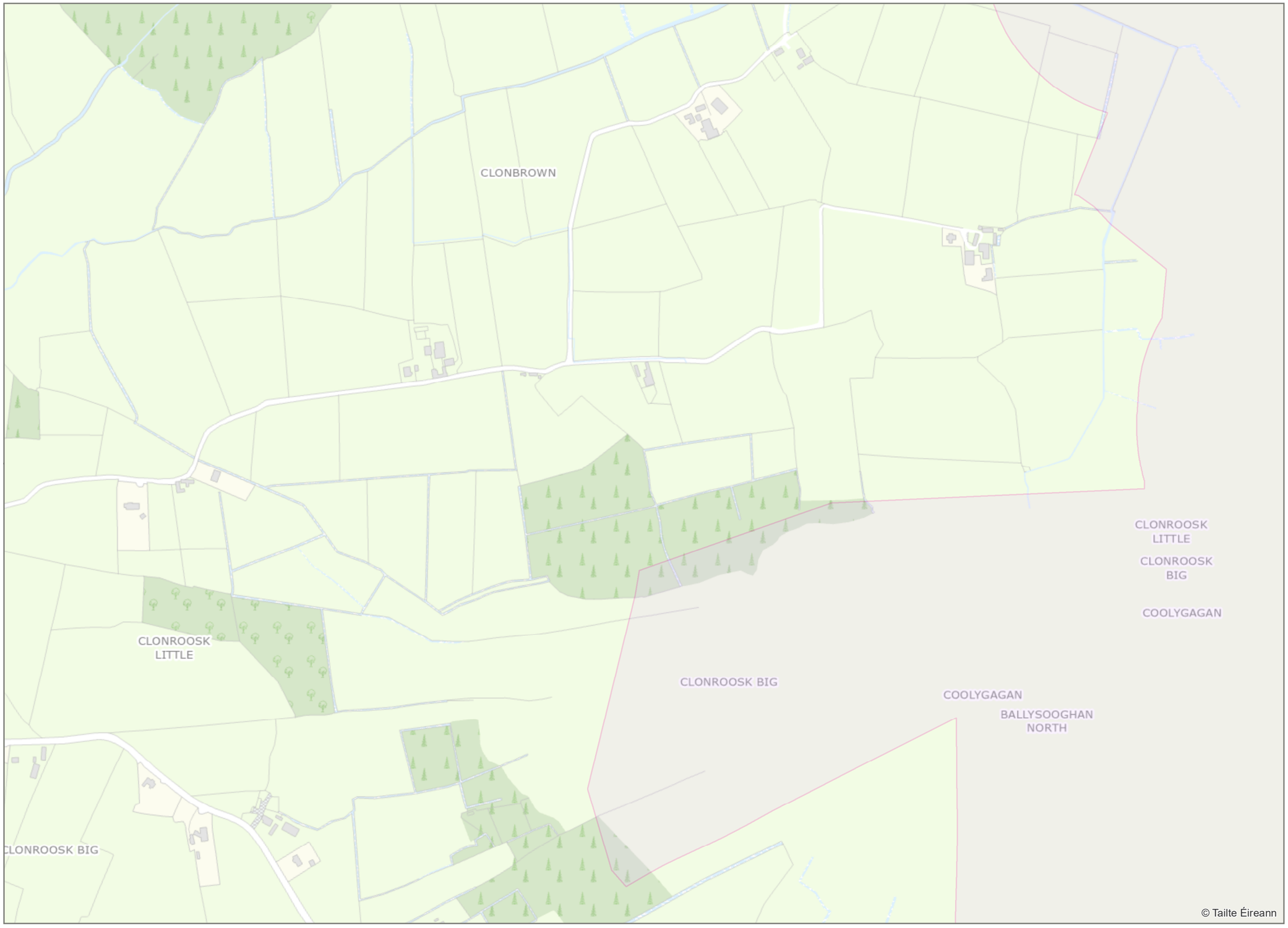
Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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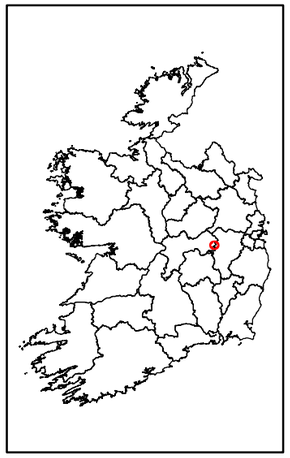
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Sewer Network - J2

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

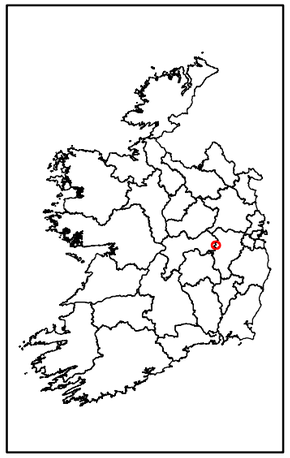
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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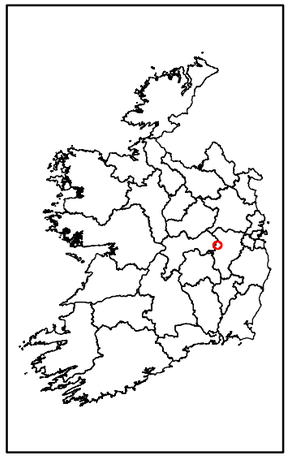
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Sewer Network - J3



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

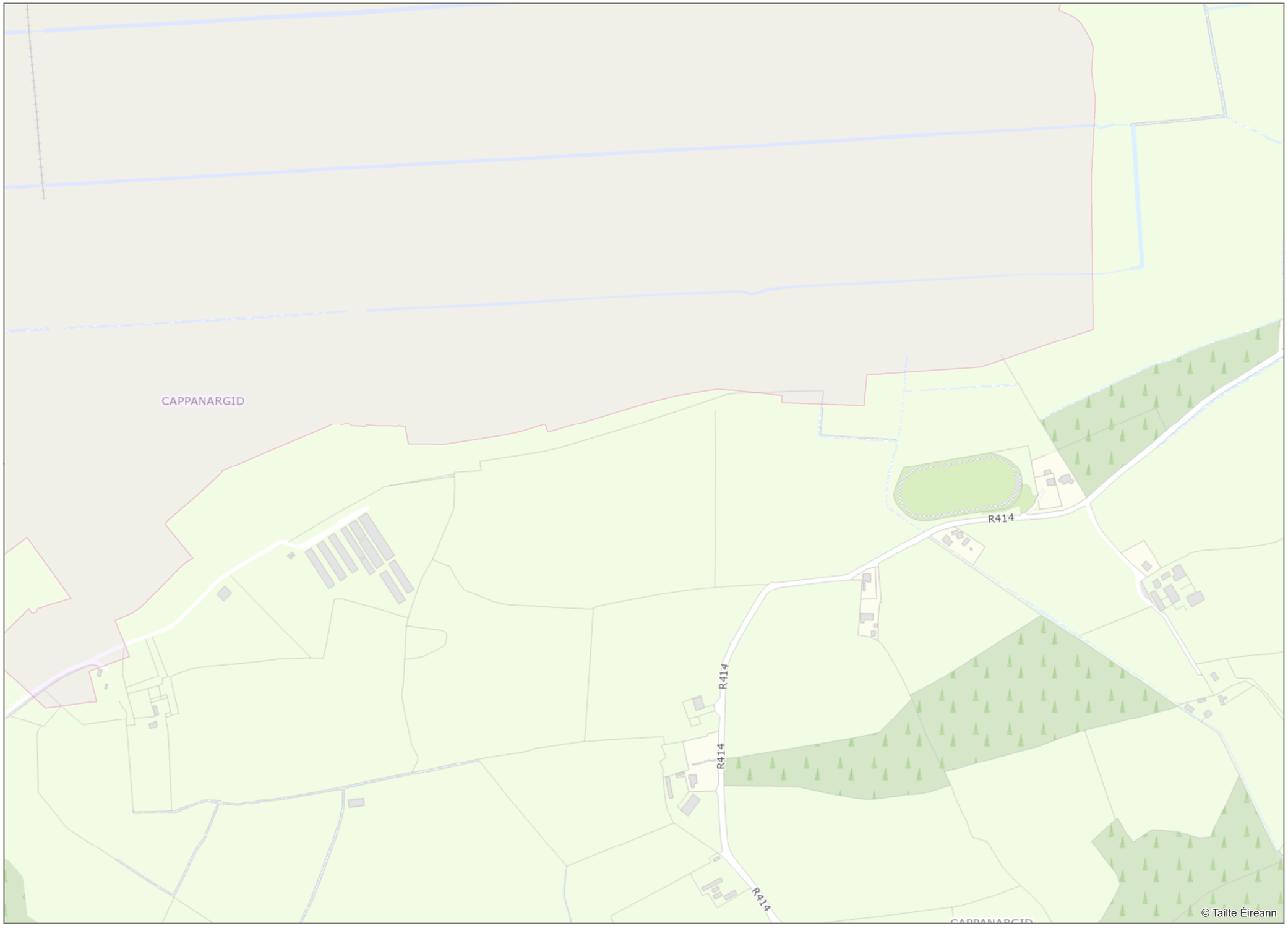
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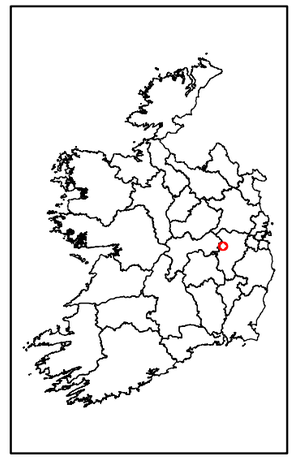
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Sewer Network - J4





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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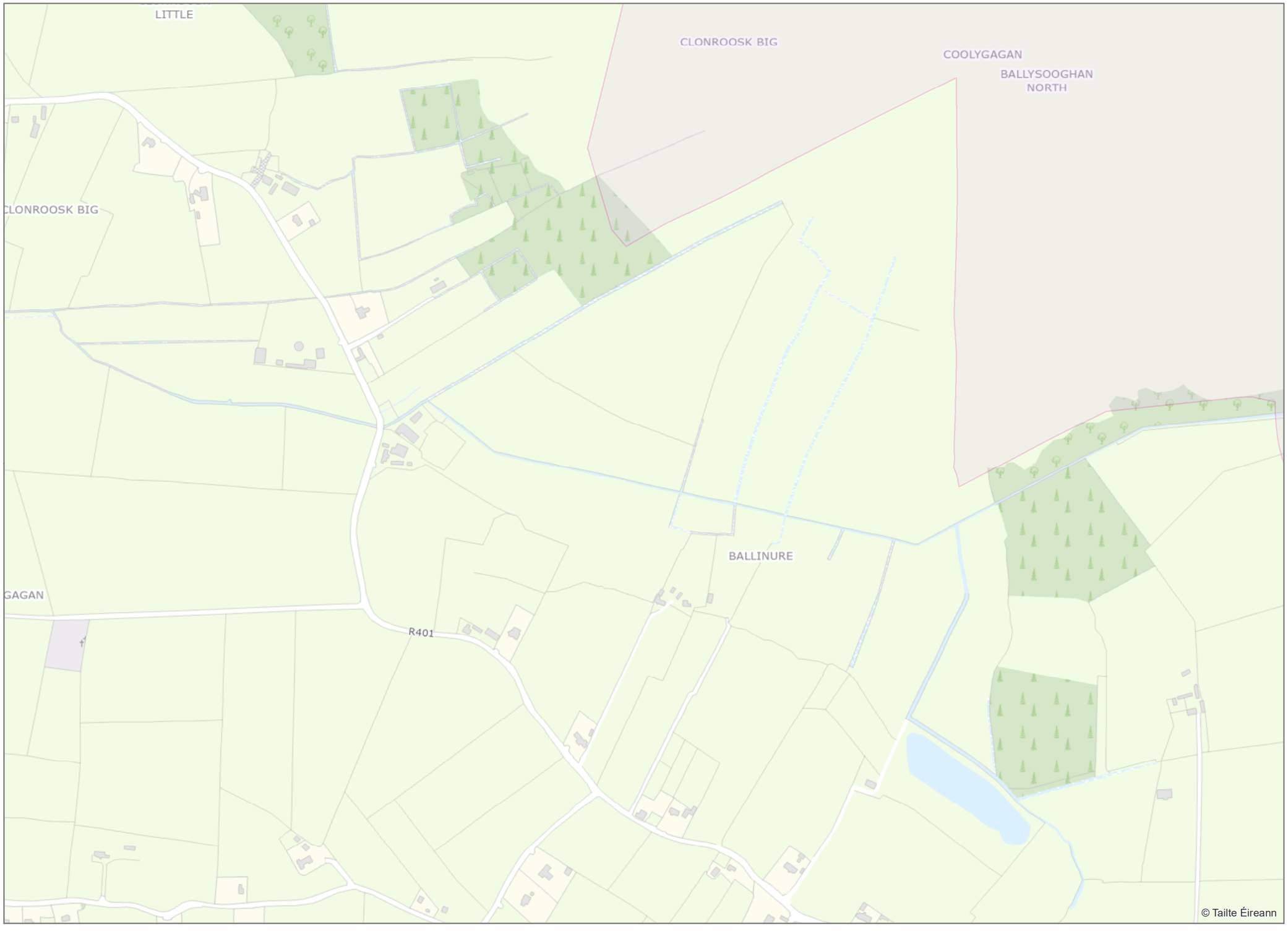
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Sewer Network - J5



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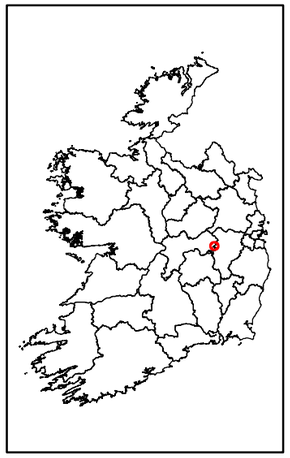
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Sewer Network - K2

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

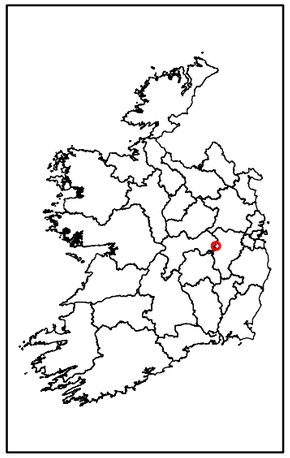
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
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Approved Date:	<dd/mm/yyyy>

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Sewer Network - K3



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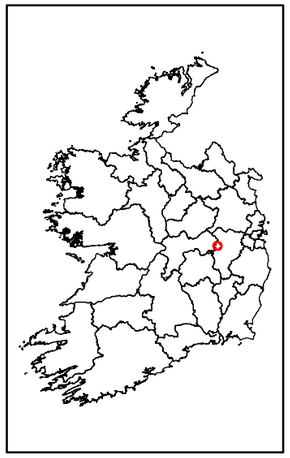
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Sewer Network - K4

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

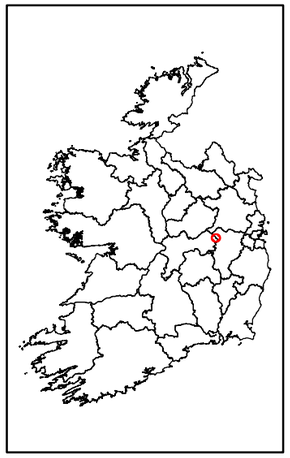
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT





Uisce Éireann
Irish Water

Legend

Proposed Development Boundary

Water Fittings

Cap

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
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Approved Date:	**<dd/mm/yyyy>**

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N

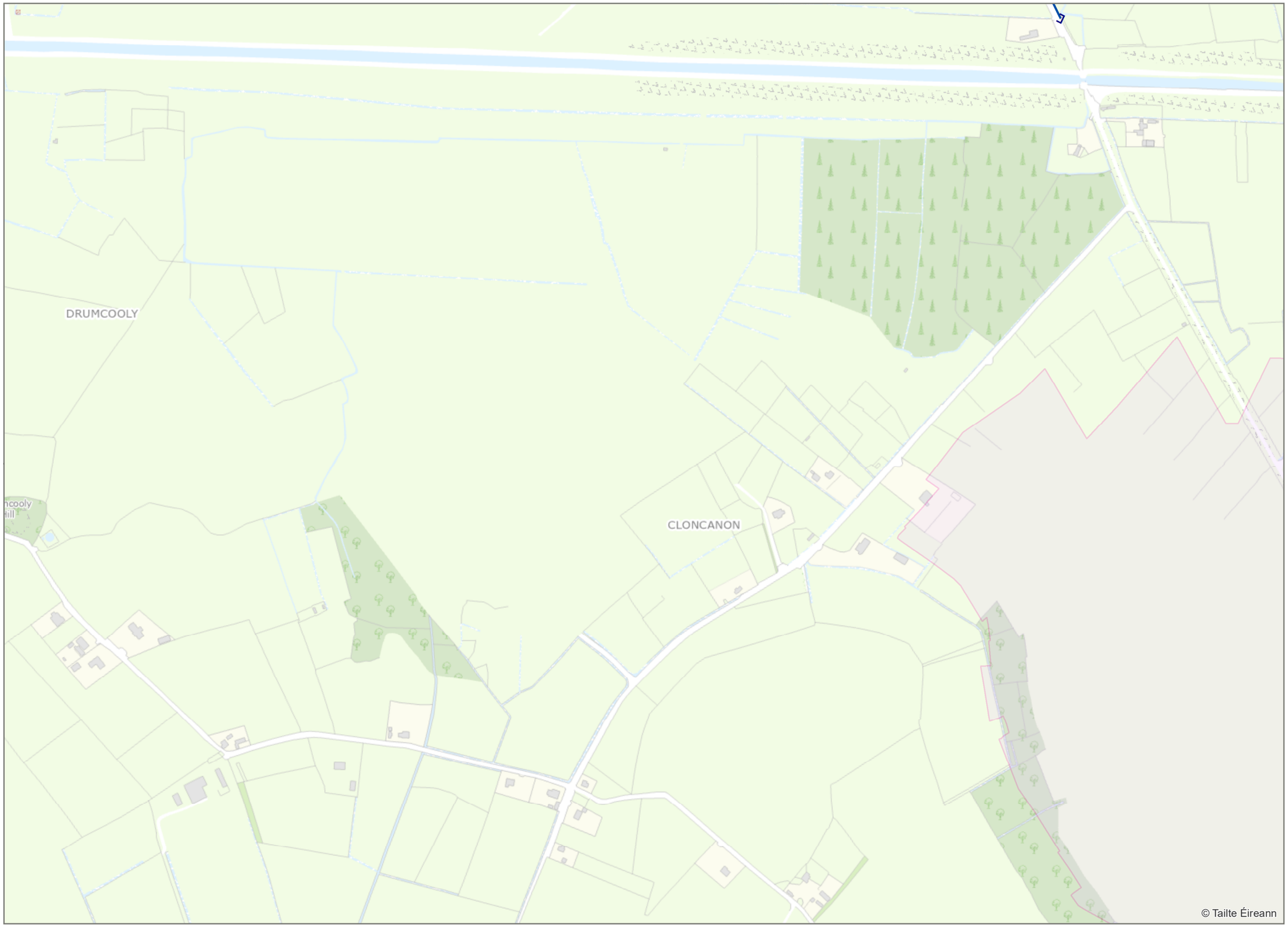
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Water Network - A3



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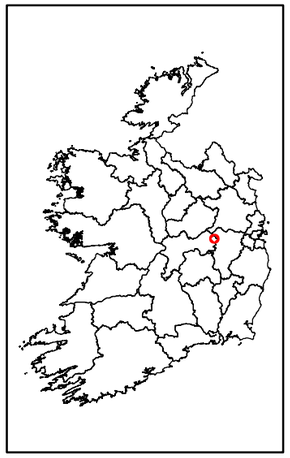
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Water Network - B2

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Cap

Water Mains(Irish Water Owned)

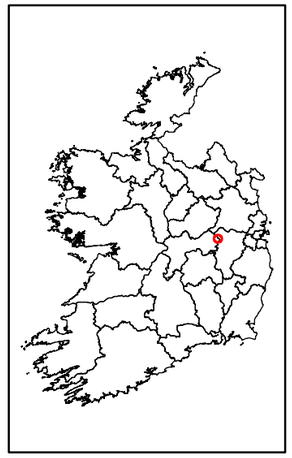
Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
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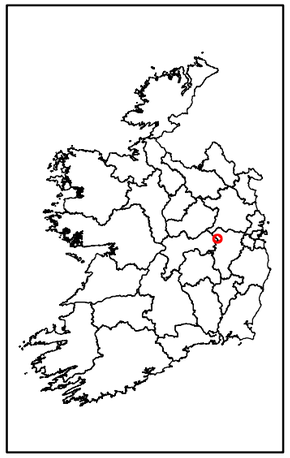
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Water Network - B3





Legend

- Proposed Development Boundary

Water Hydrants

- Fire Hydrant

Water Fittings

- Cap
- Other Fitting

Water Mains(Irish Water Owned)

- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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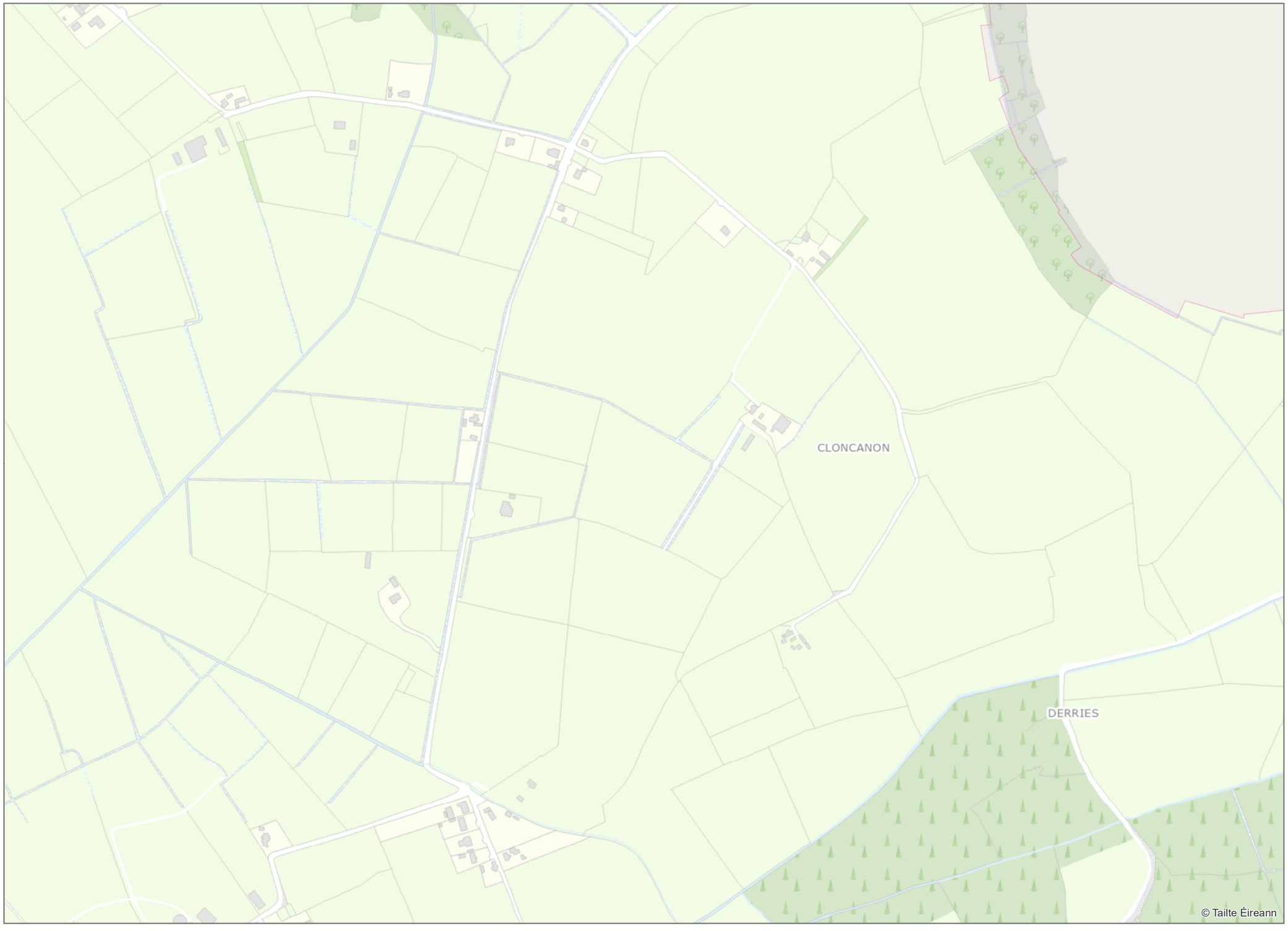
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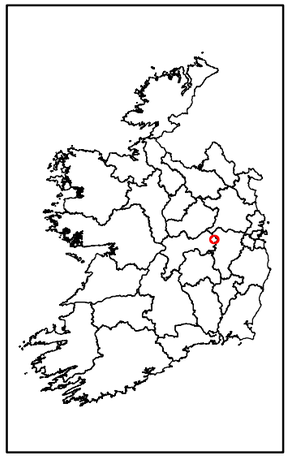
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Water Network - B4





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

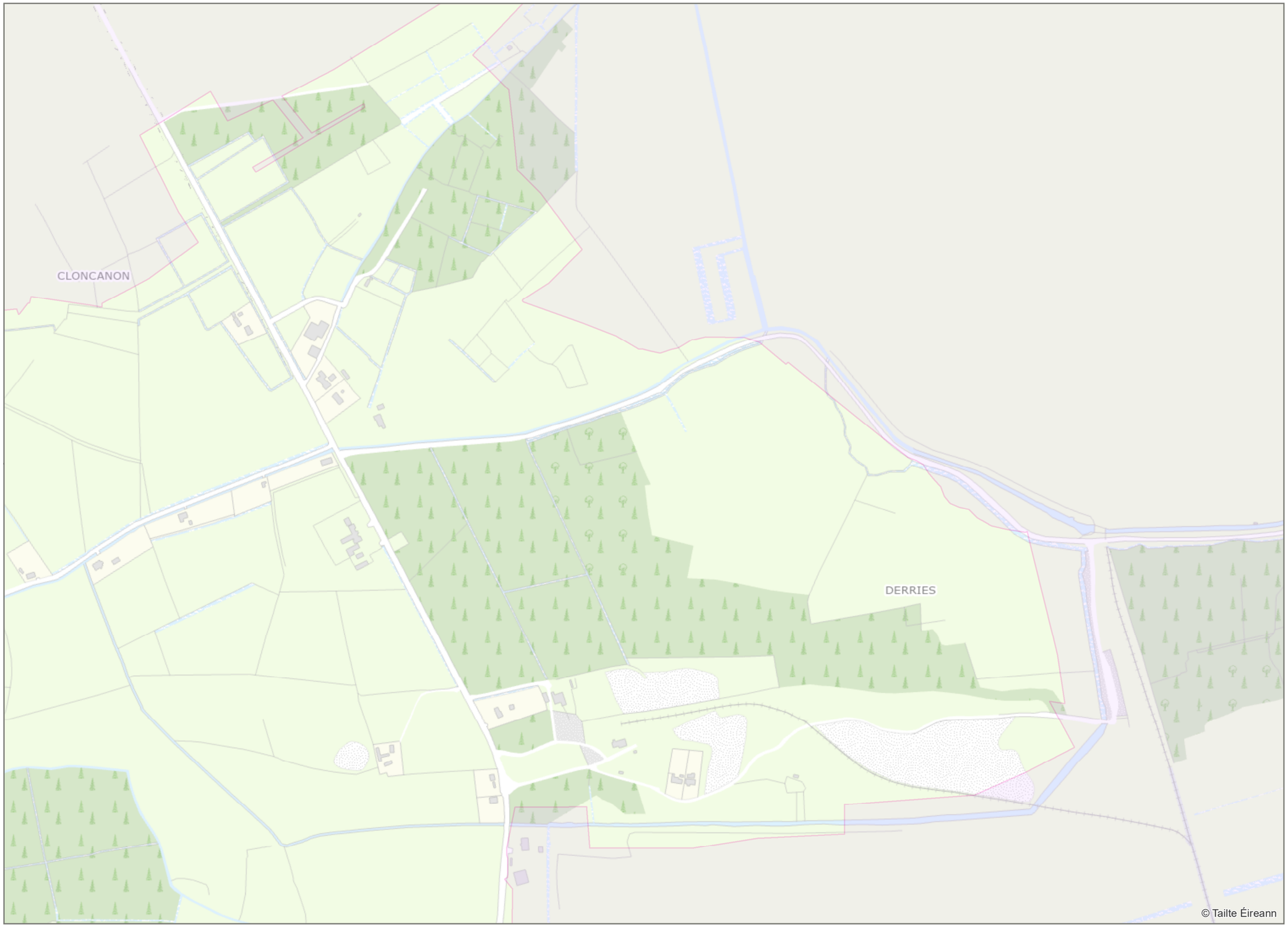
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Water Network - C2



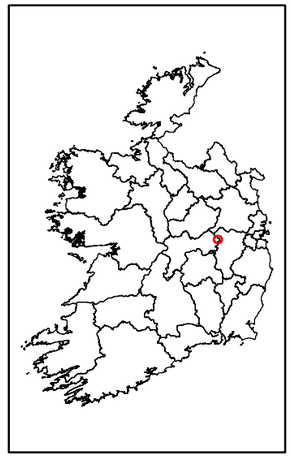
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Water Network - C3



Legend

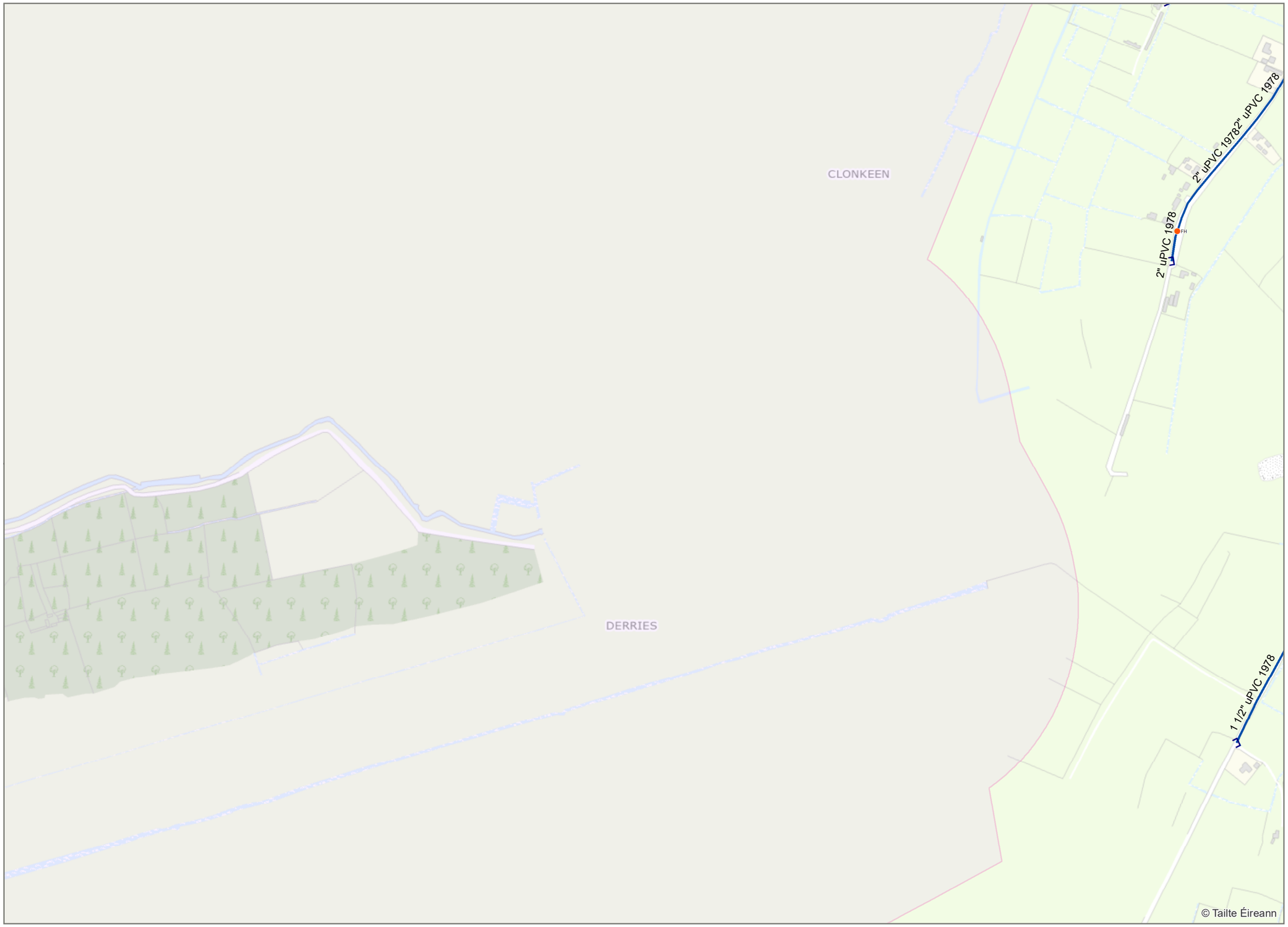
Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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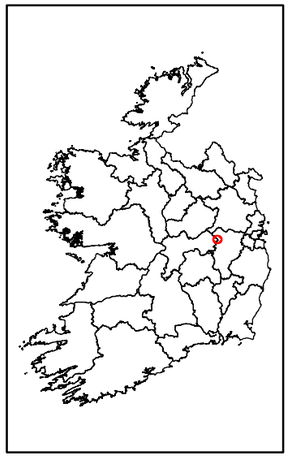
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Water Network - C4

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Hydrants

FH Fire Hydrant

Water Fittings

Cap

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
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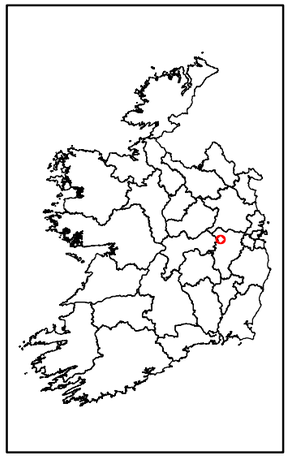
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Water Network - C6

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

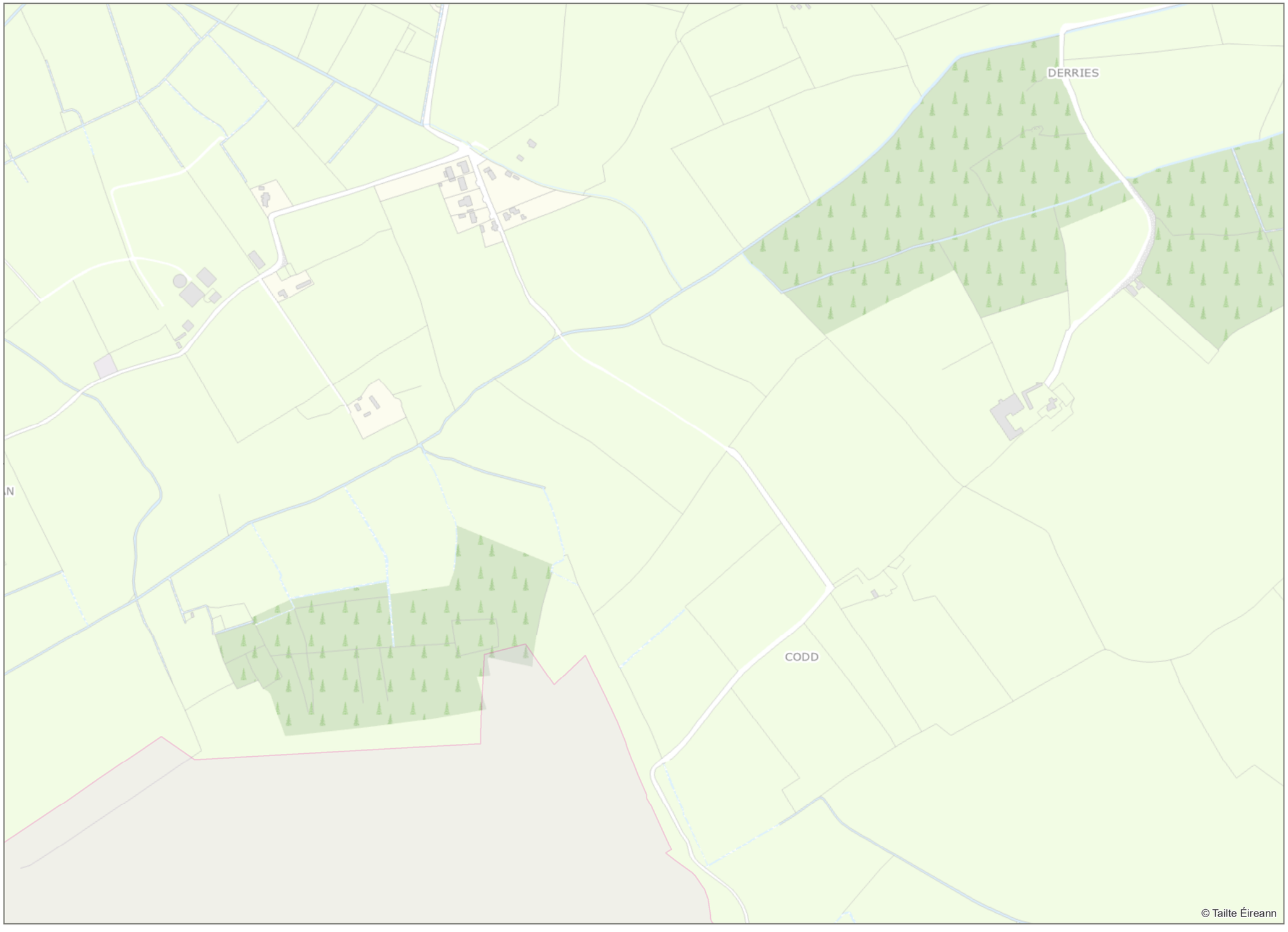
Potable Water

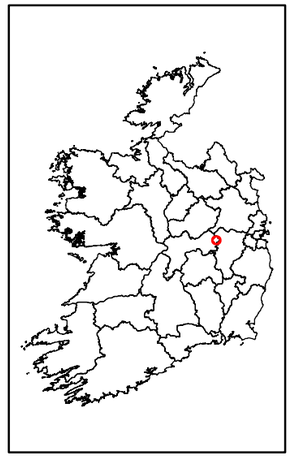
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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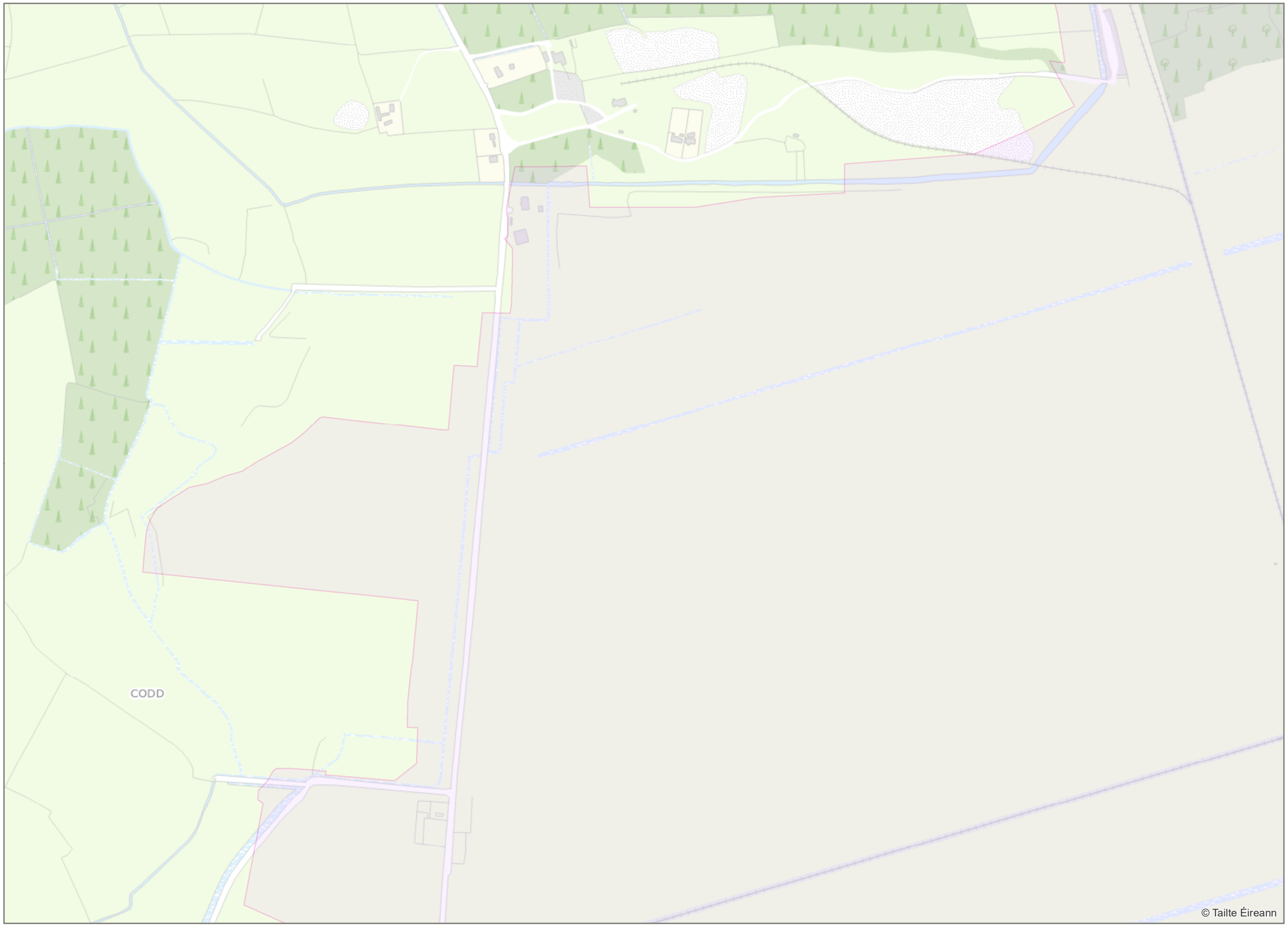
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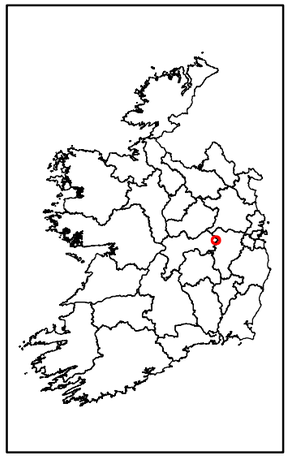
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Water Network - D2



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

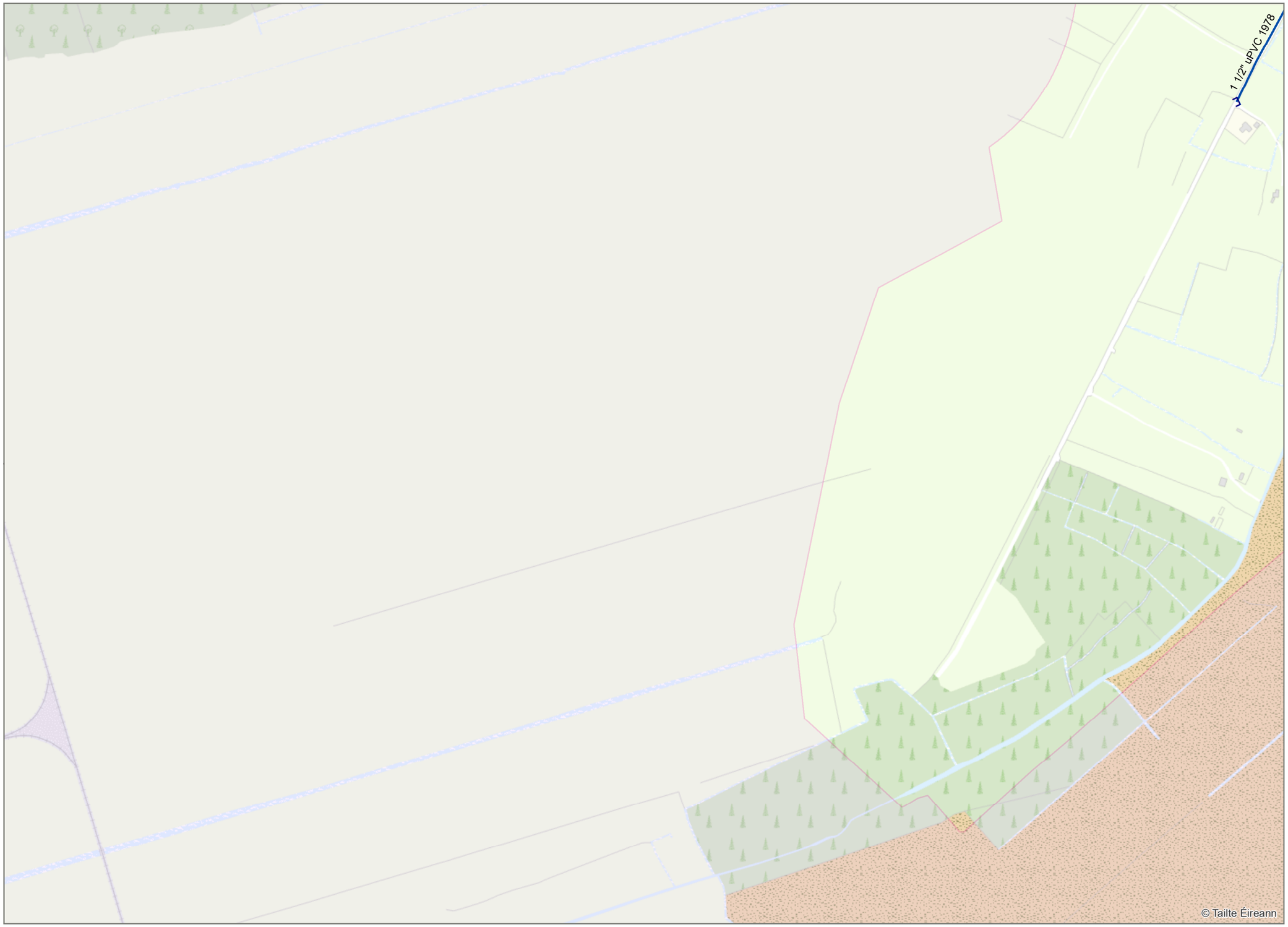
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Water Network - D3



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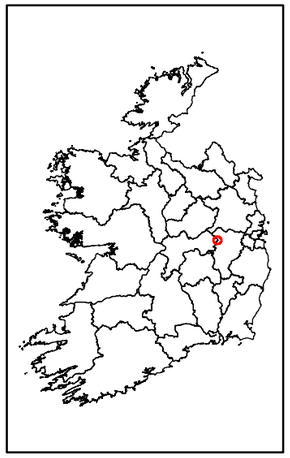
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Water Network - D4

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Cap

Water Mains(Irish Water Owned)

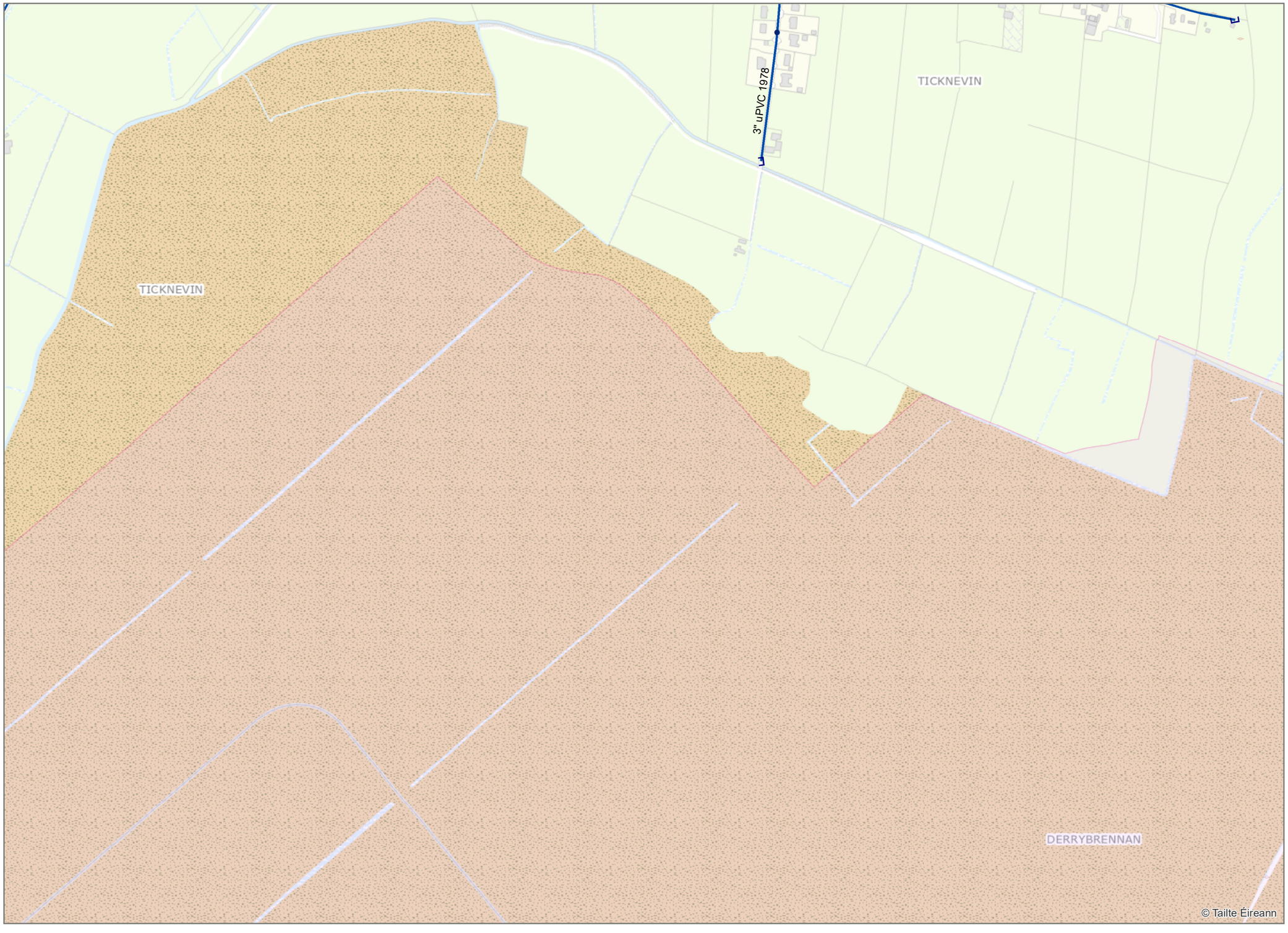
Potable Water

0 45 90 180 m

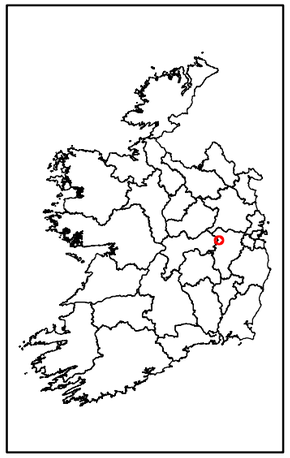
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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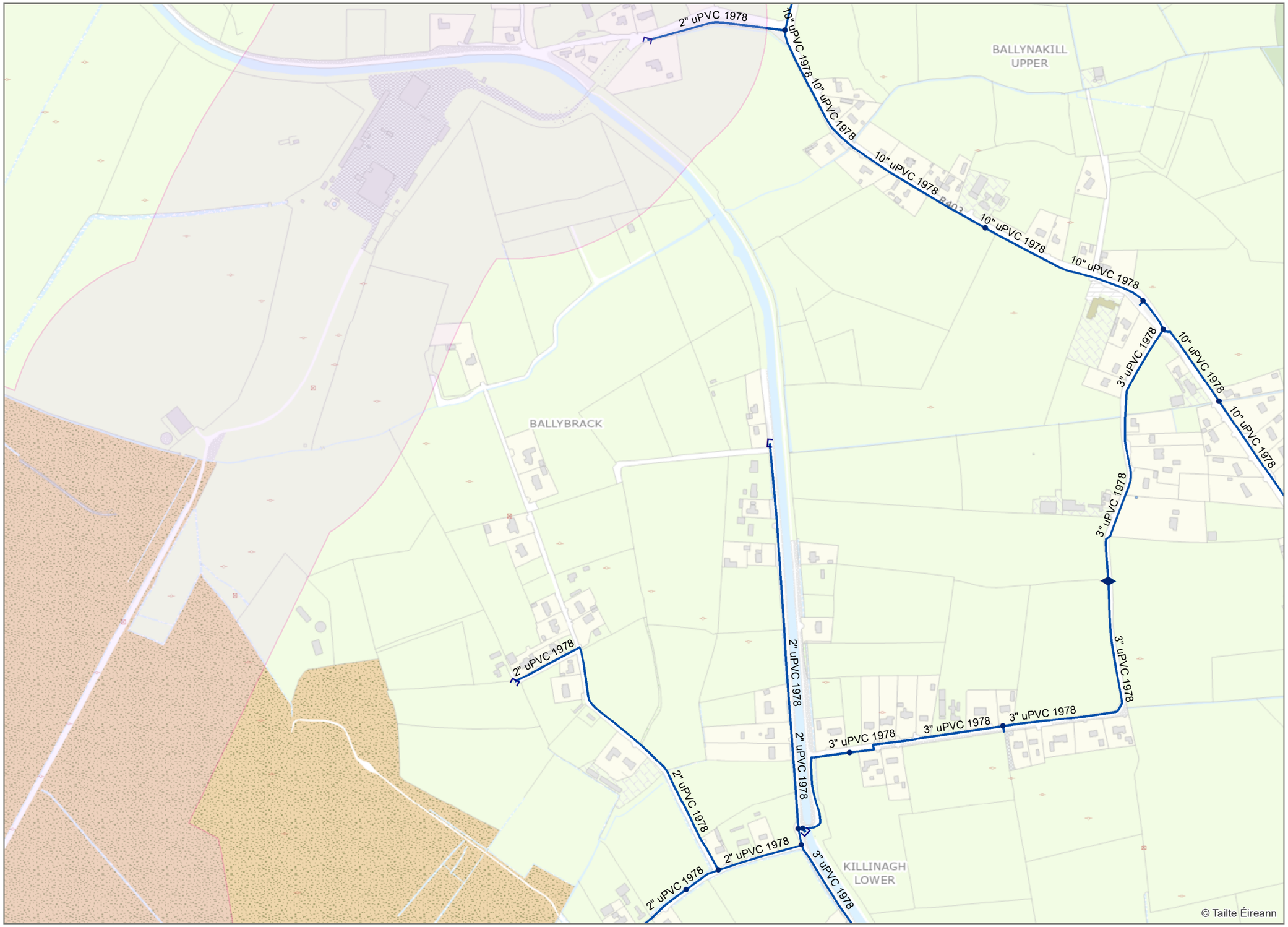
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Water Network - D5



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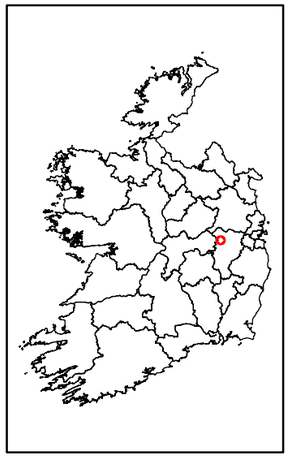
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Water Network - D6

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

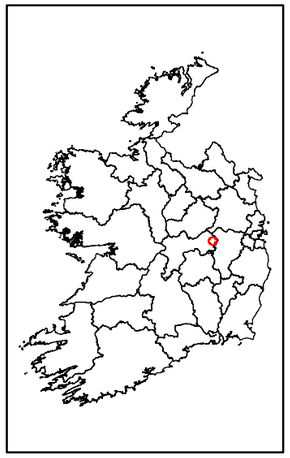
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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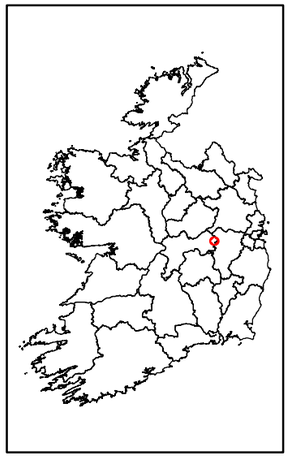
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Water Network - E1





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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Water Network - E2



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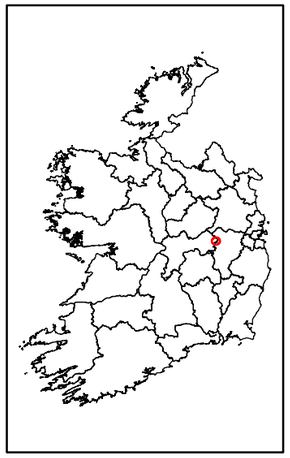
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Water Network - E3

Uisce Éireann
Irish Water



Legend

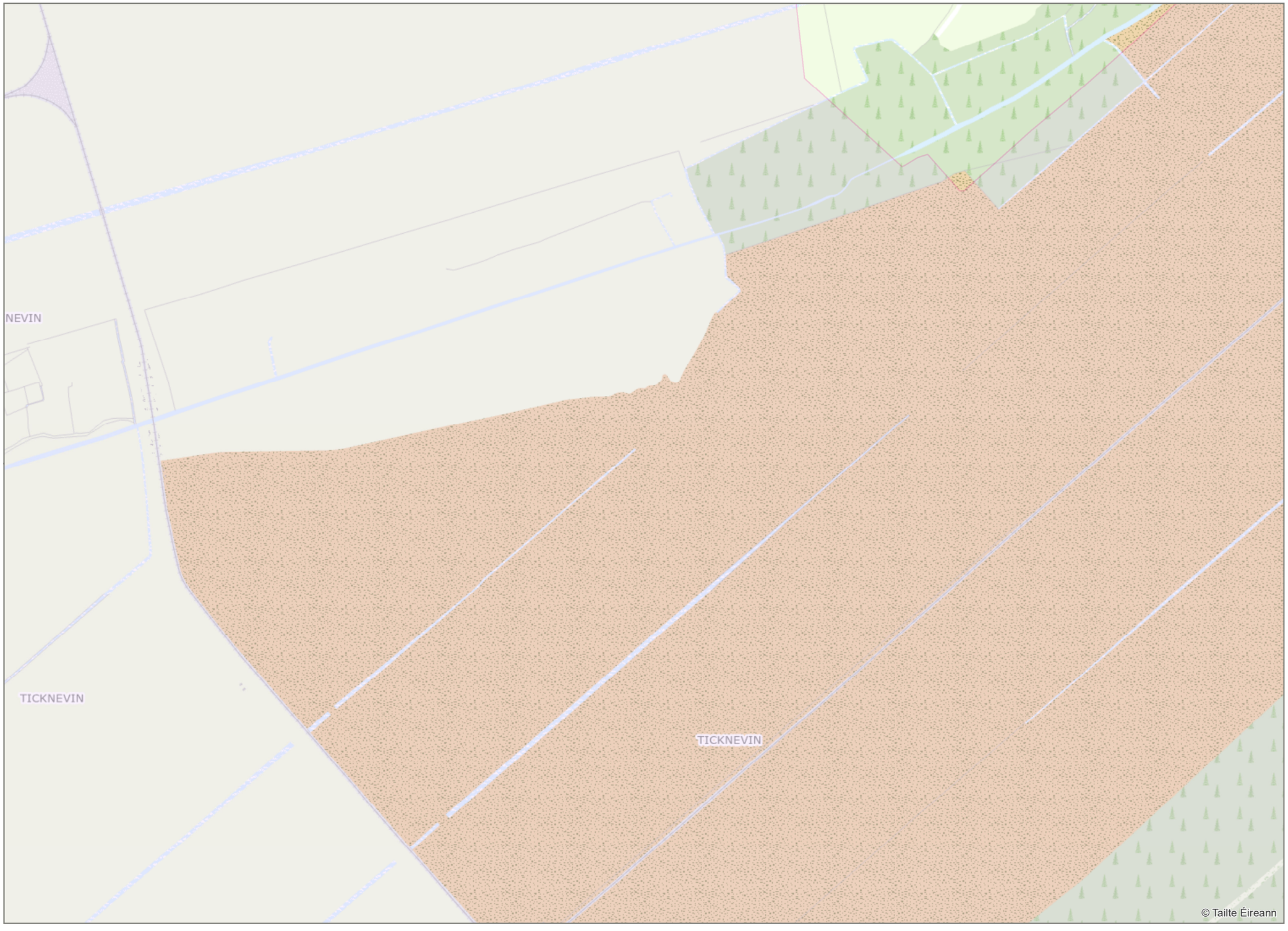
Proposed Development Boundary

0 45 90 180 m

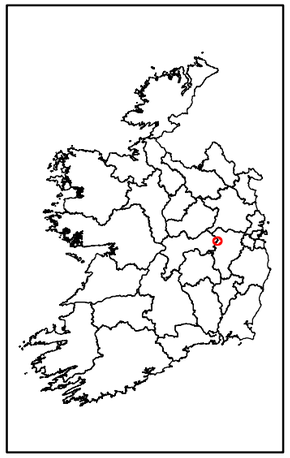
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
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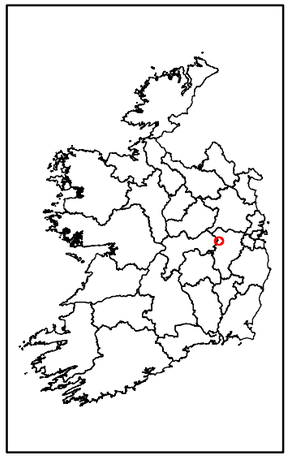
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Water Network - E4





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
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Drawn Date	21/04/2026
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Approved Date:	<dd/mm/yyyy>

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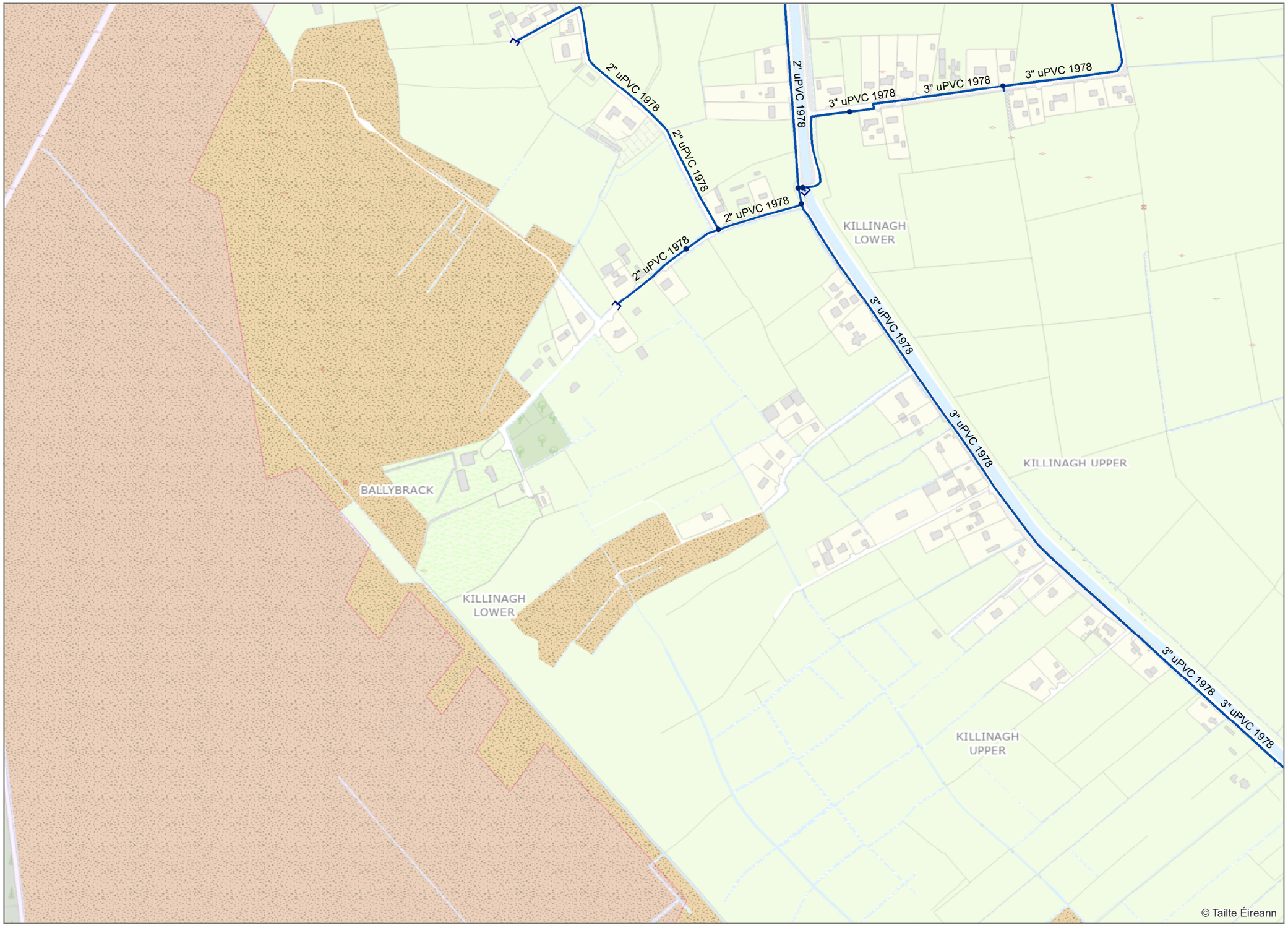
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Water Network - E5



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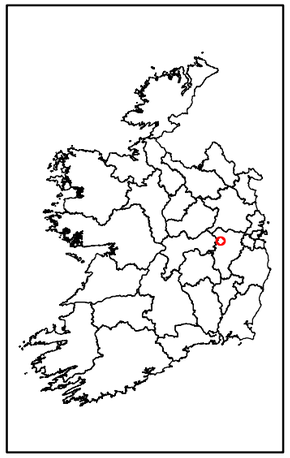
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Water Network - E6

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Cap

Other Fitting

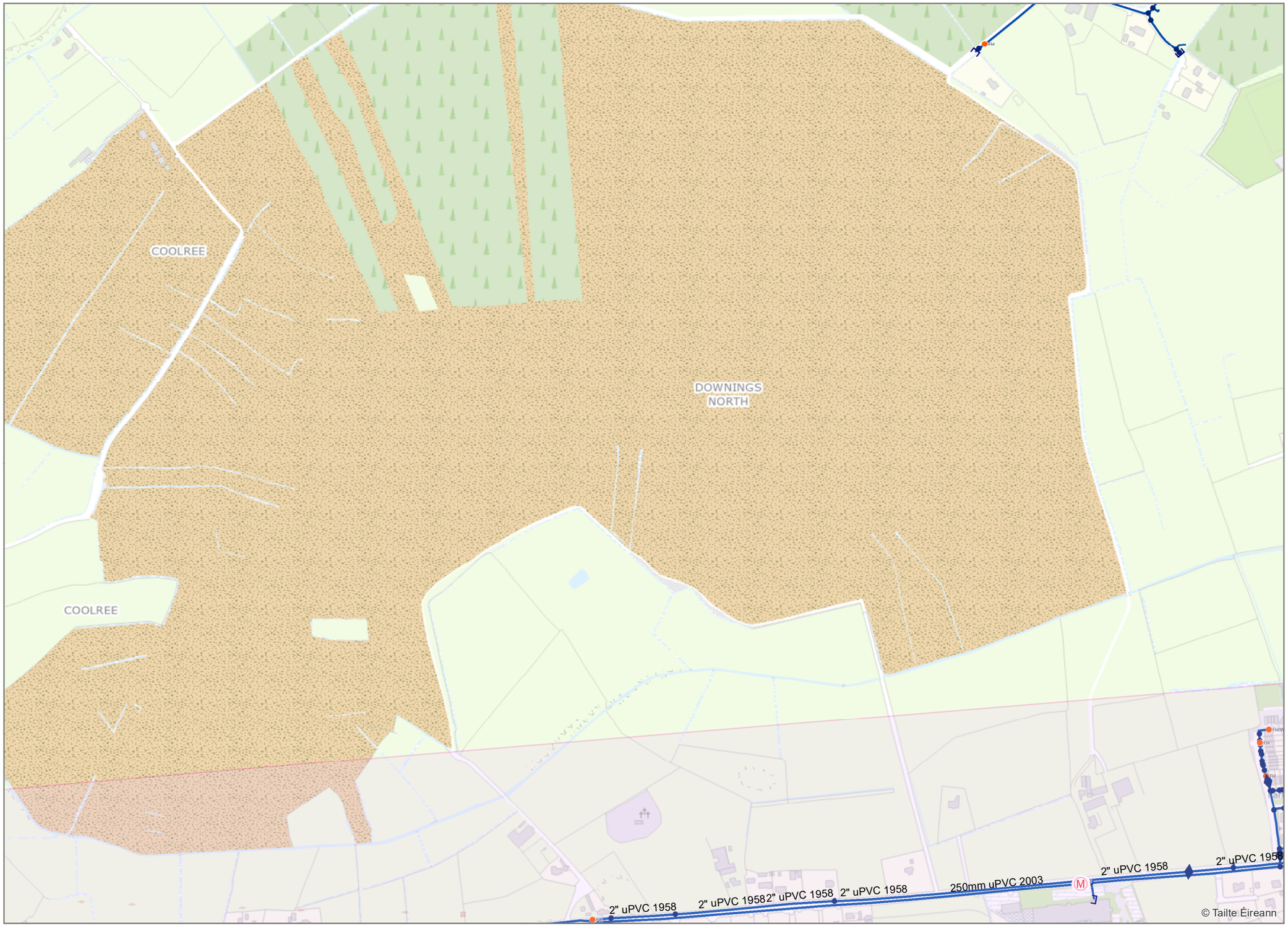
Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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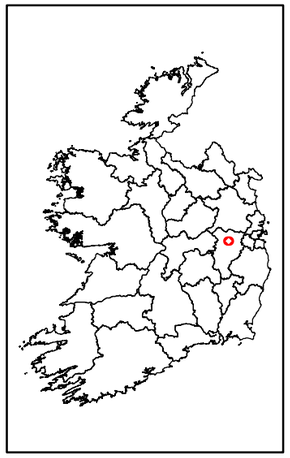
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Water Network - E11

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Boundary Meter

District (Boundary Meter)

Water Hydrants

Fire Hydrant

Fire Hydrant/Washout

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

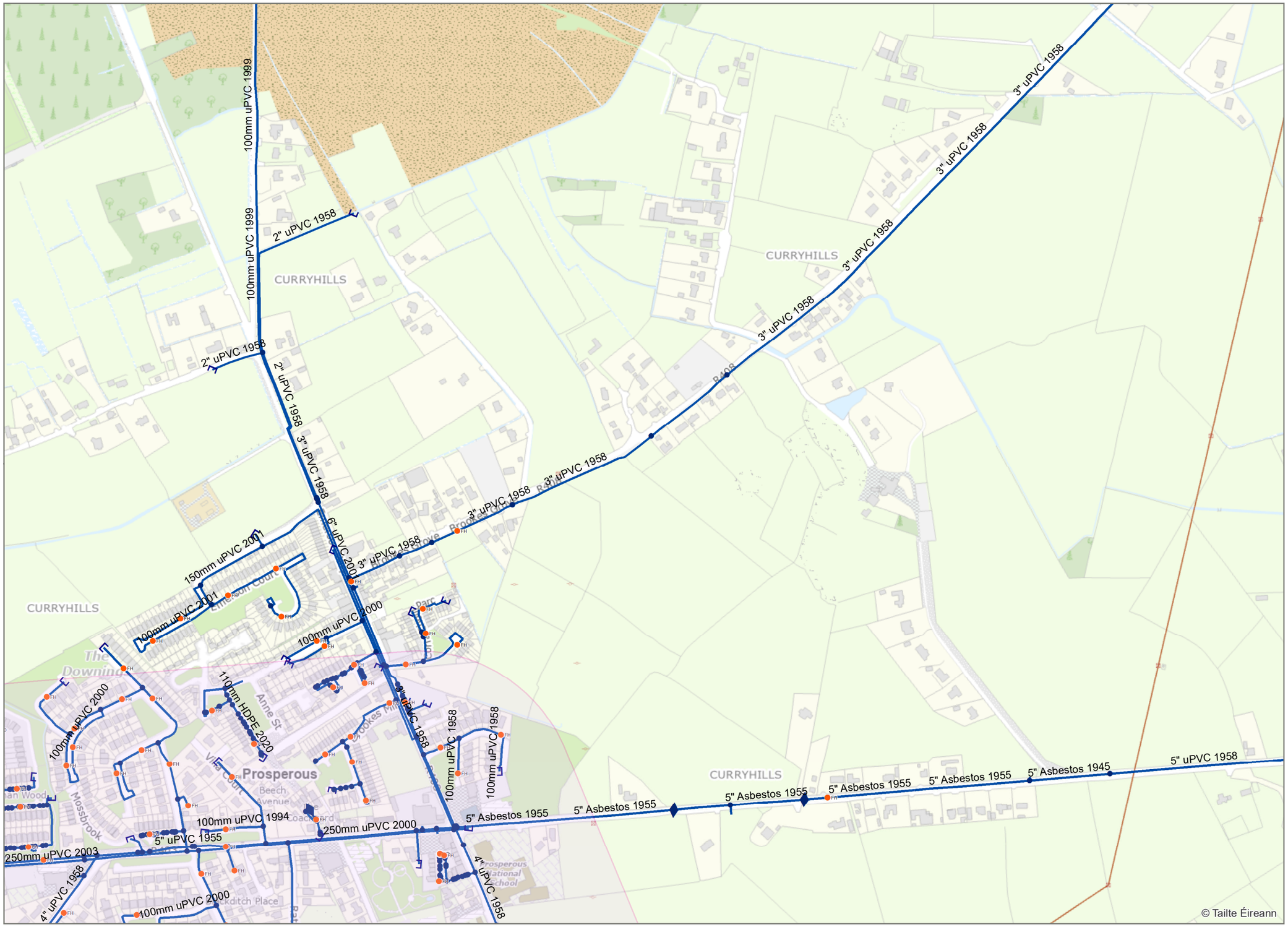
Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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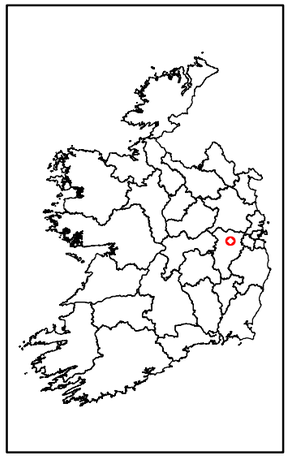
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Water Network - E12

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Hydrants

Fire Hydrant

Fire Hydrant/Washout

Washout

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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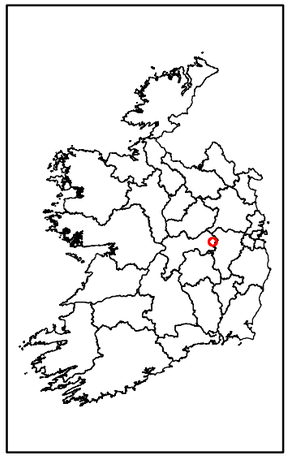
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Water Network - F1

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Hydrants

Fire Hydrant

Water Fittings

Cap

Water Mains(Irish Water Owned)

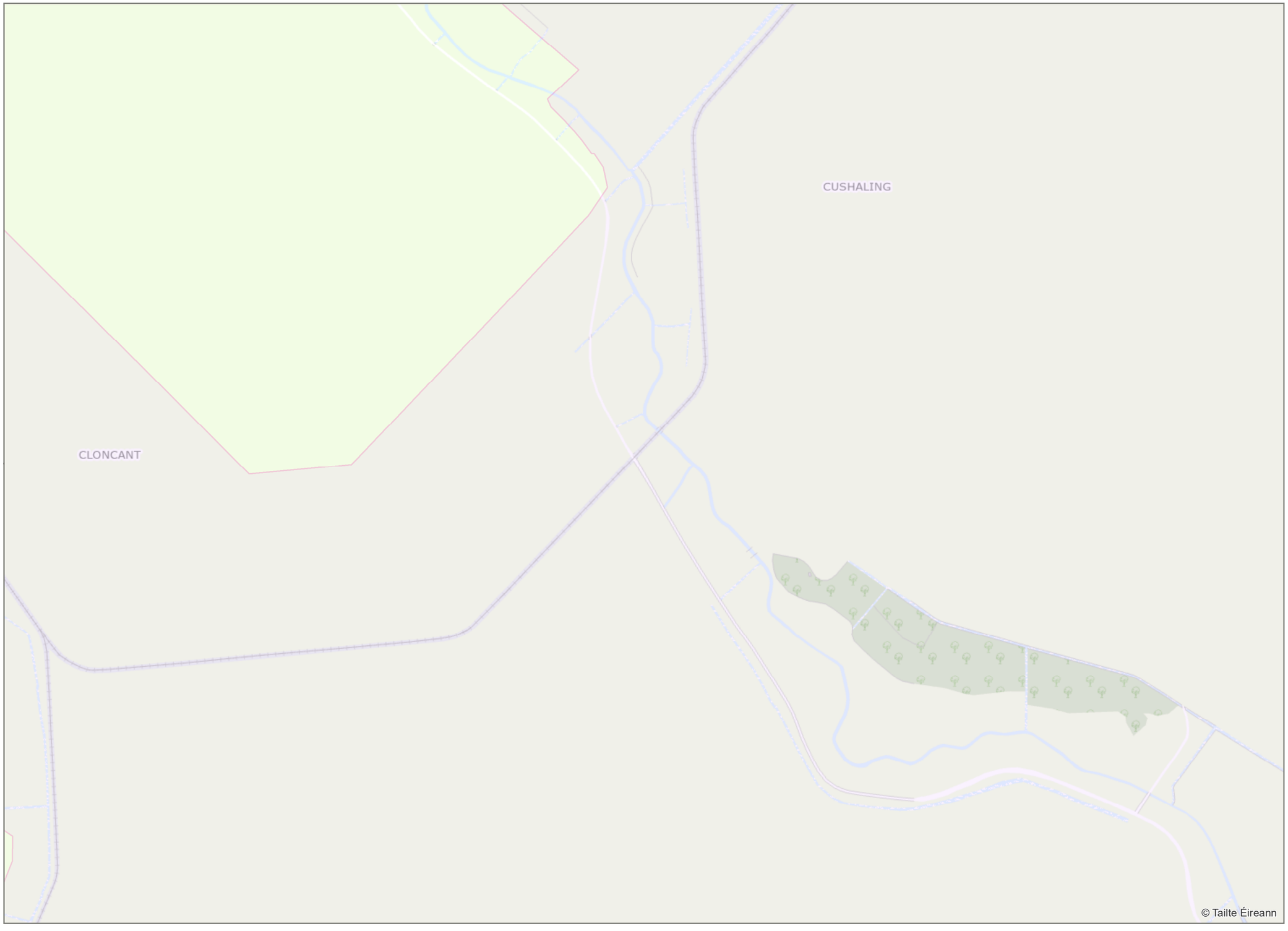
Potable Water

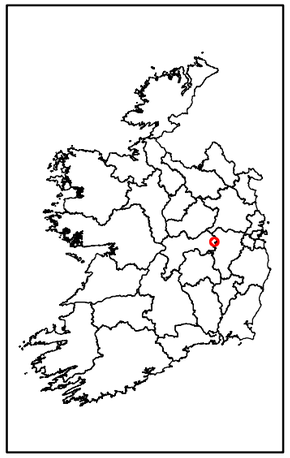
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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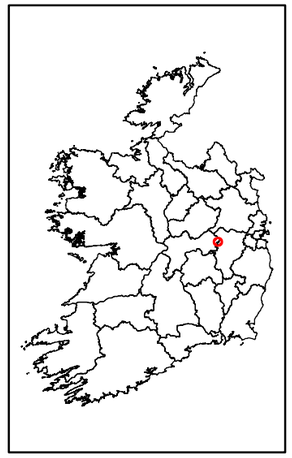
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Water Network - F2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

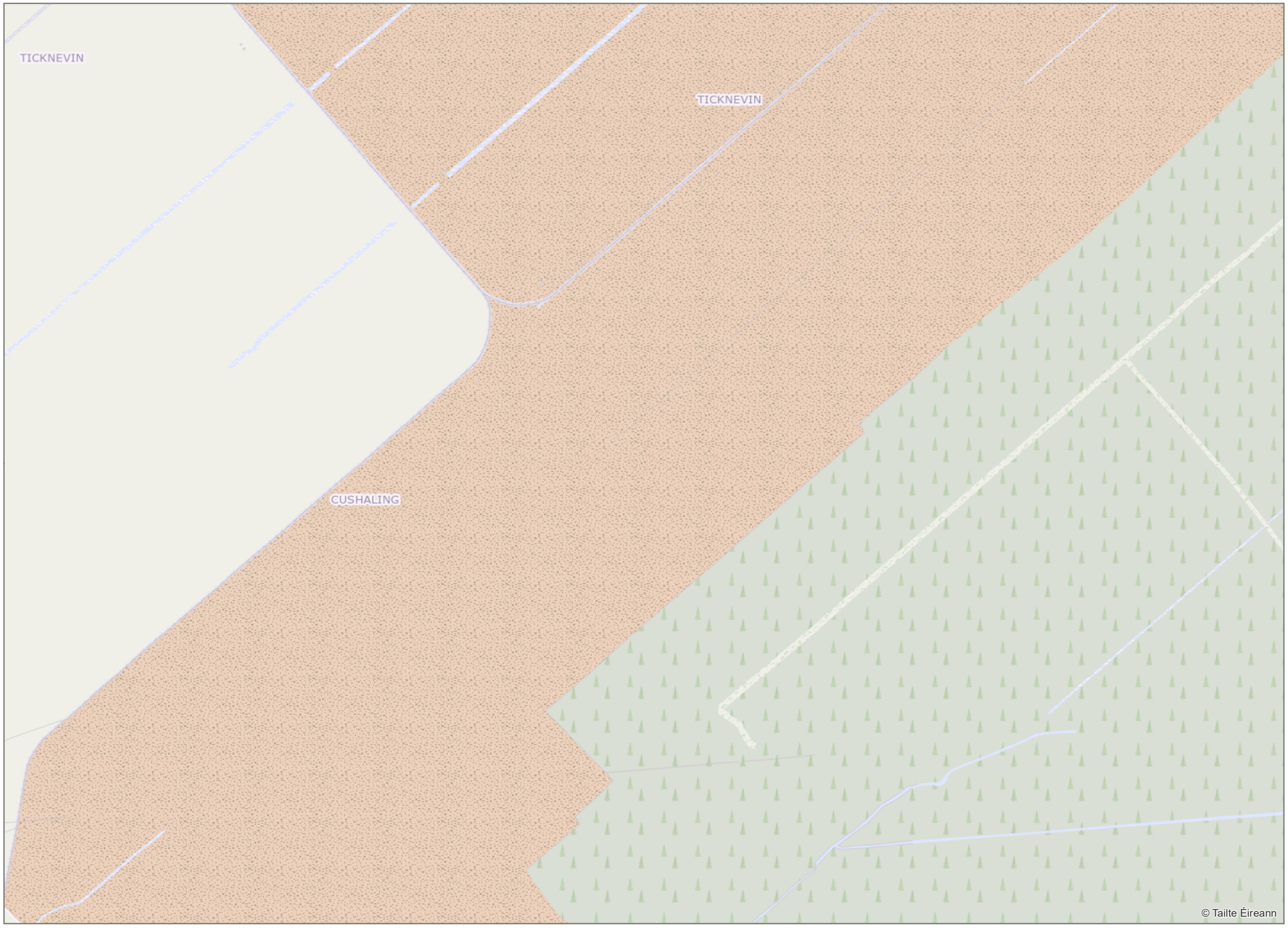
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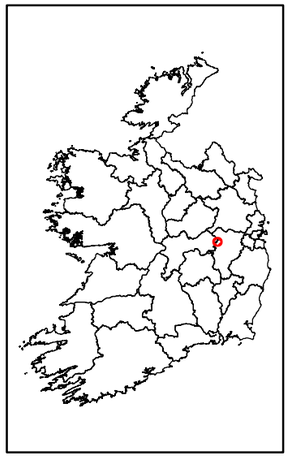
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Water Network - F3



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180
m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

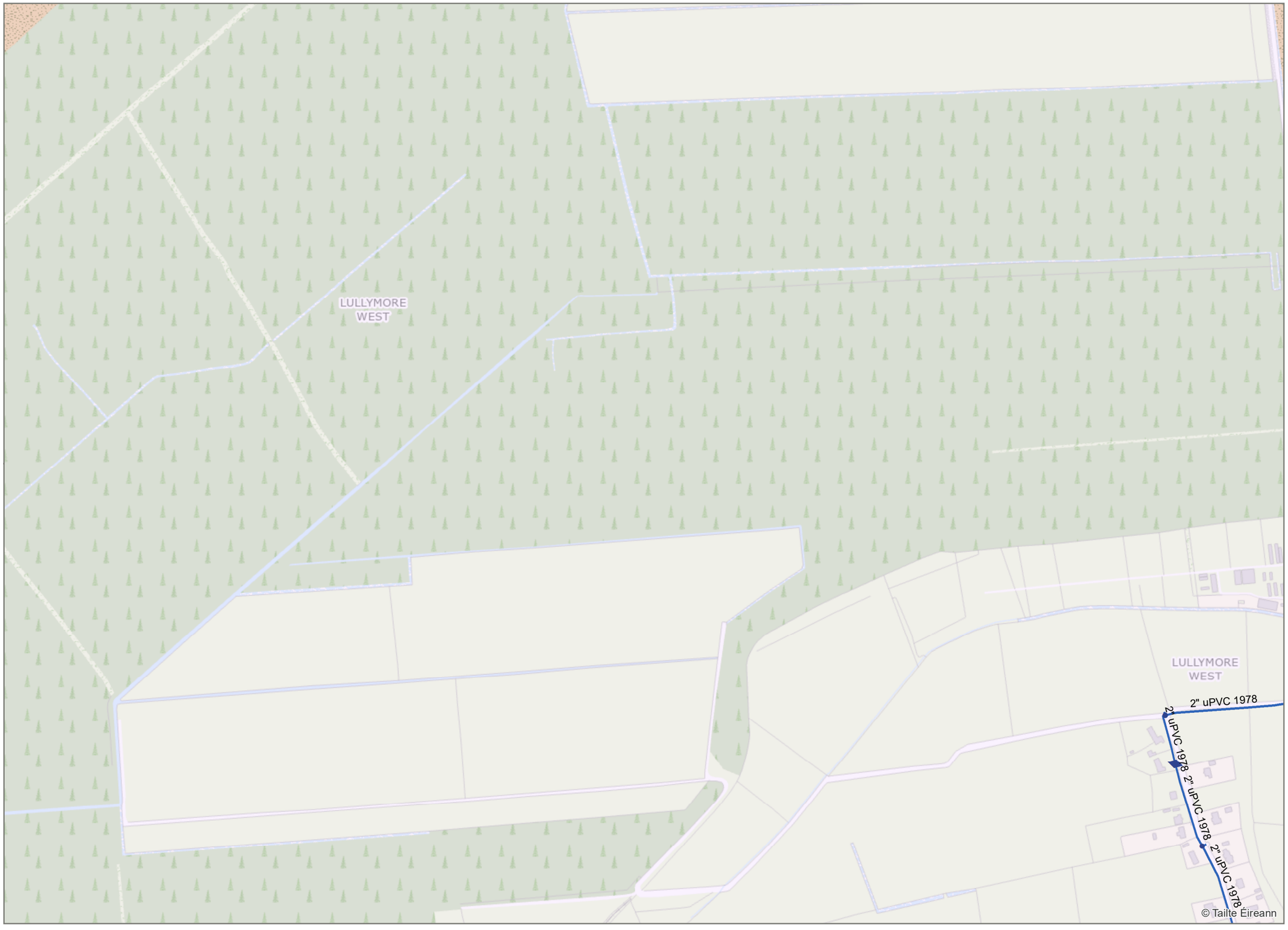
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Water Network - F4



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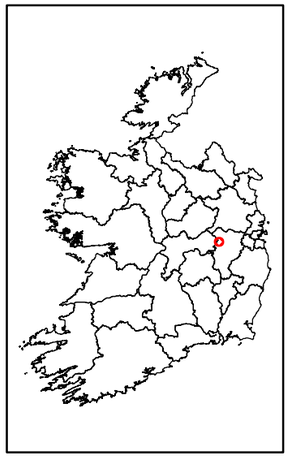
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Water Network - F5

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Fittings

Other Fitting

Water Mains(Irish Water Owned)

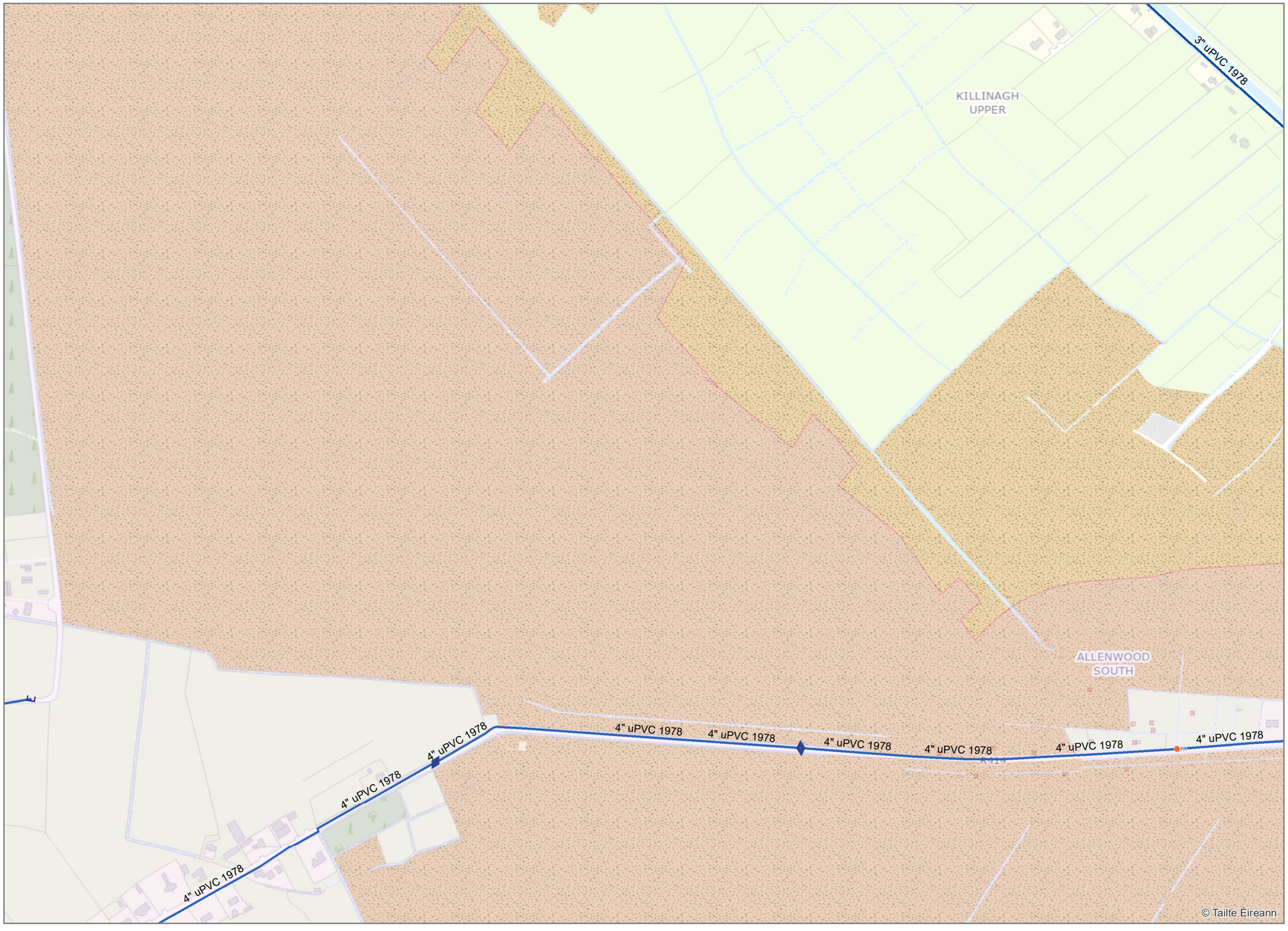
Potable Water

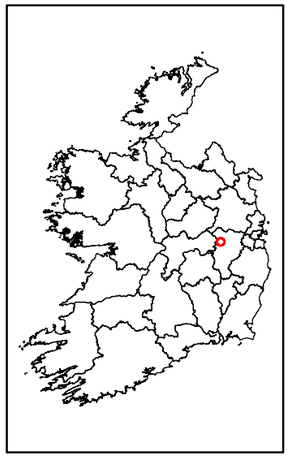
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Hydrants

Fire Hydrant

Water Fittings

Cap

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

N

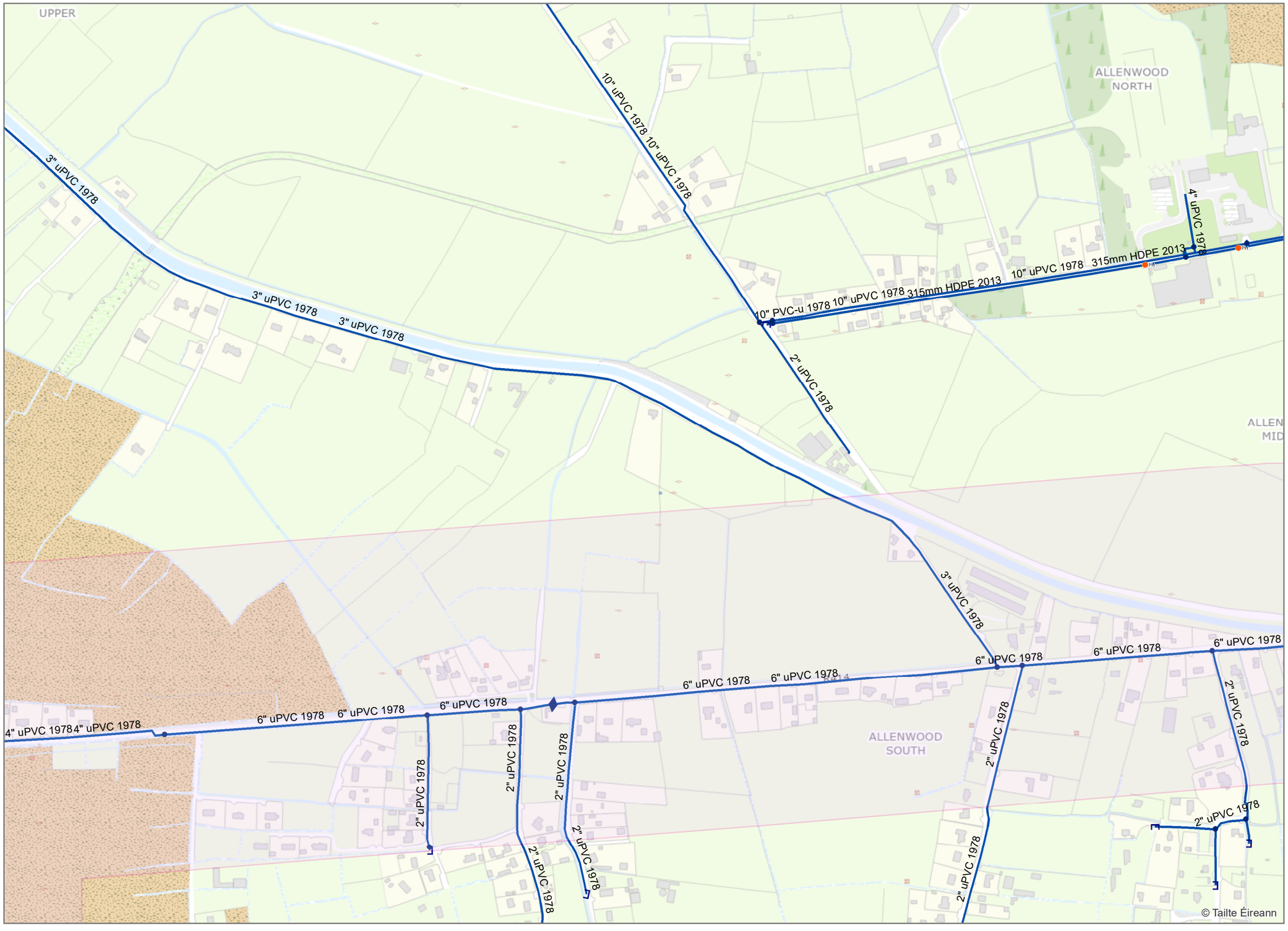
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Water Network - F6



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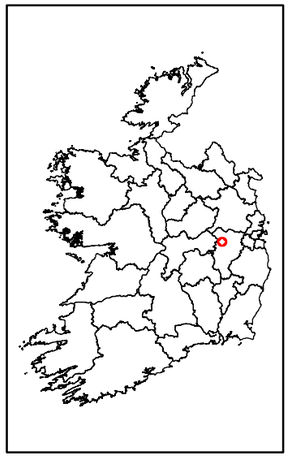
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Water Network - F7

Uisce Éireann
Irish Water



Legend

- Proposed Development Boundary

Air Control Valves

- Air Control Valves

Water Hydrants

- Fire Hydrant

Water Fittings

- Cap
- Other Fitting

Water Mains(Irish Water Owned)

- Potable Water

Water Mains(Non Irish Water Owned)

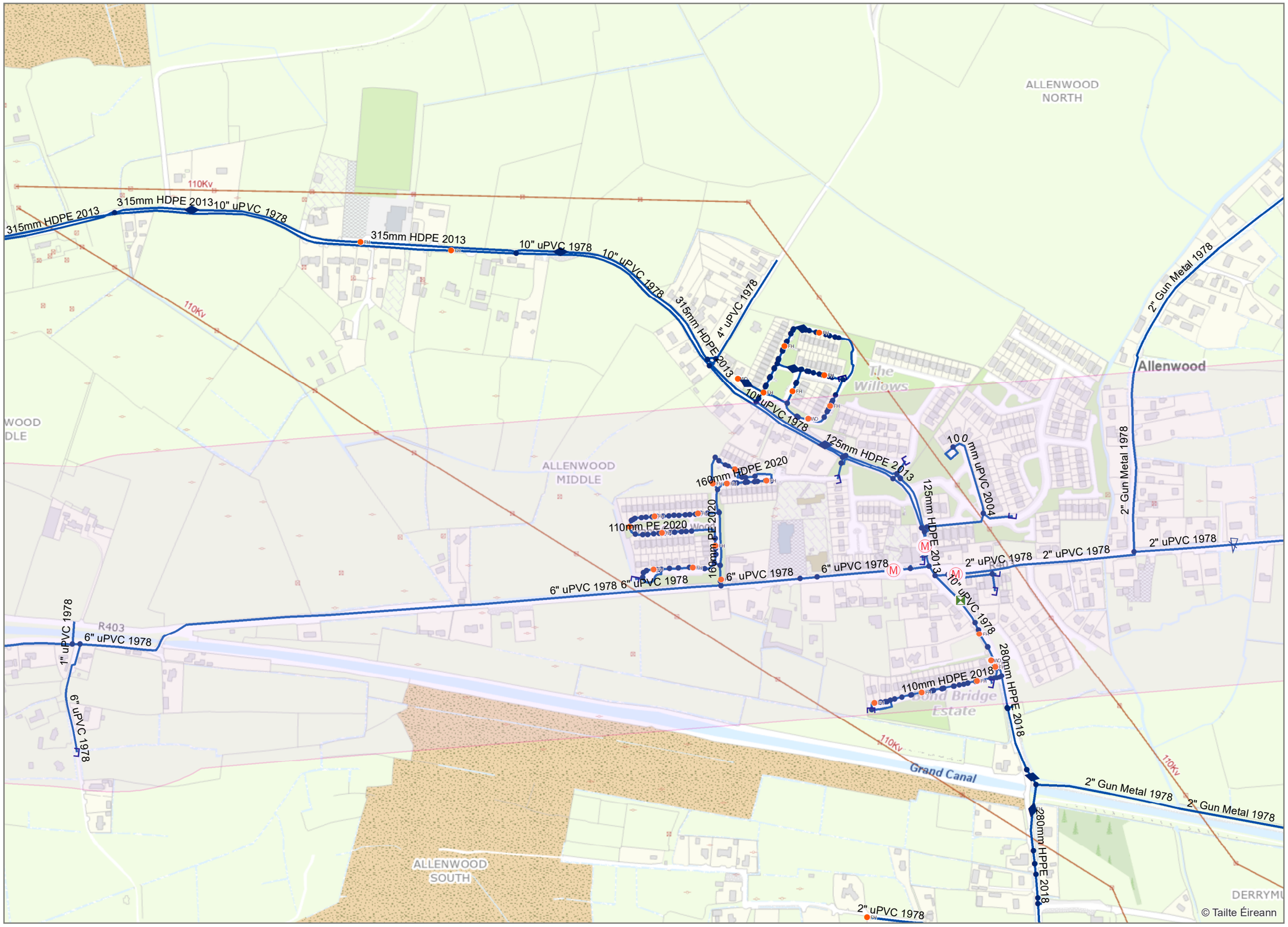
- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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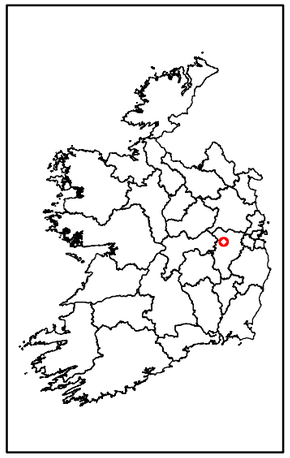
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Water Network - F8

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Flow Control Valves

PRV

Air Control Valves

Air Control Valves

Boundary Meter

District (Boundary Meter)

Water Hydrants

Fire Hydrant

Washout

Kisok

Kisok

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

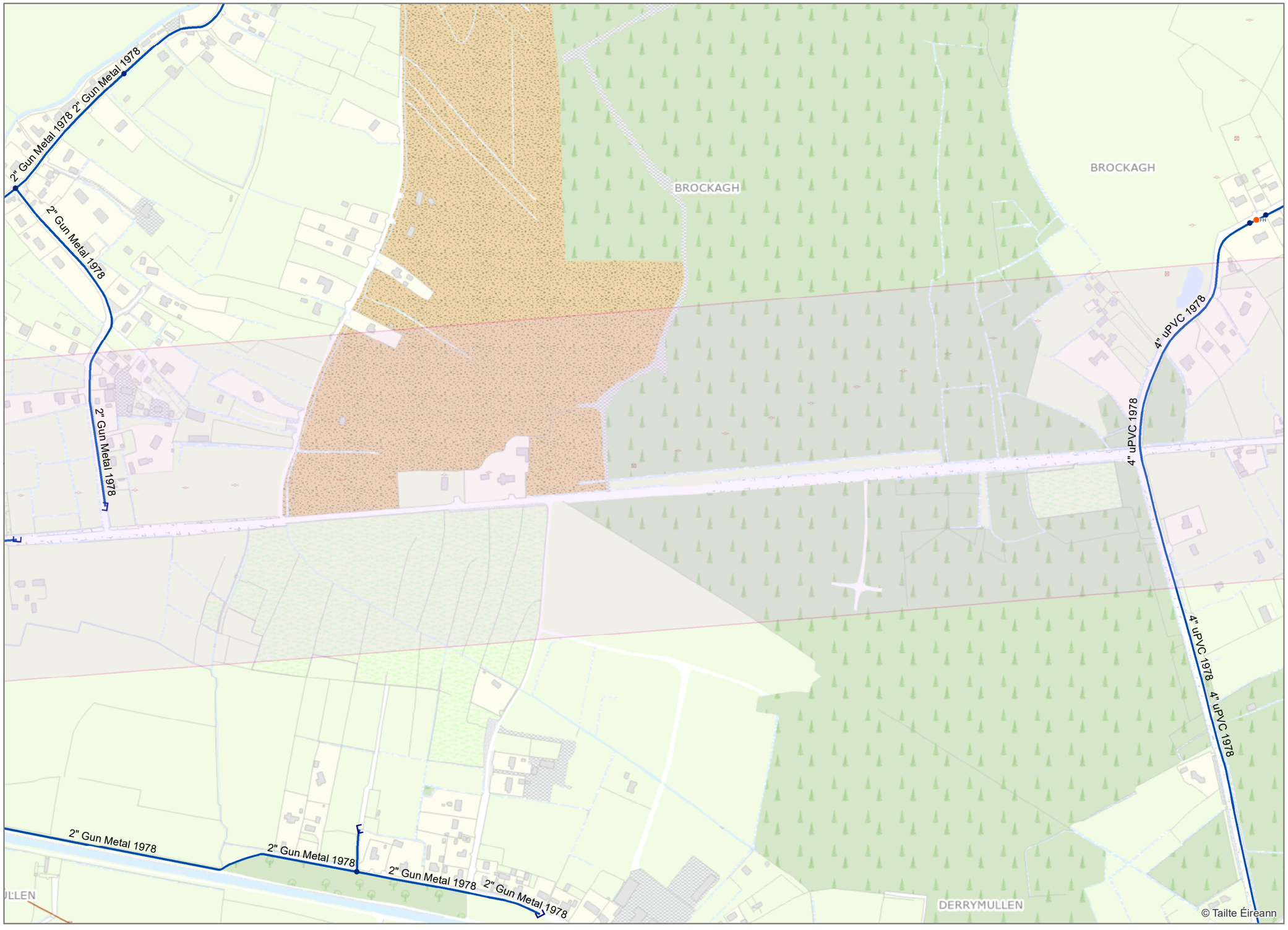
Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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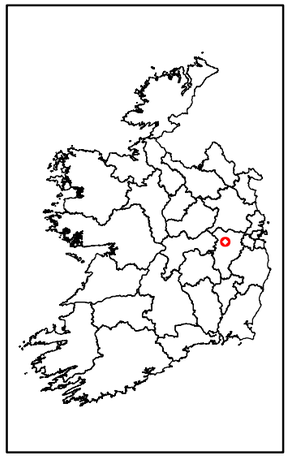
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Water Network - F9

Uisce Éireann
Irish Water



Legend

- Proposed Development Boundary

Water Hydrants

- FH Fire Hydrant

Water Fittings

- Cap
- Other Fitting

Water Mains(Irish Water Owned)

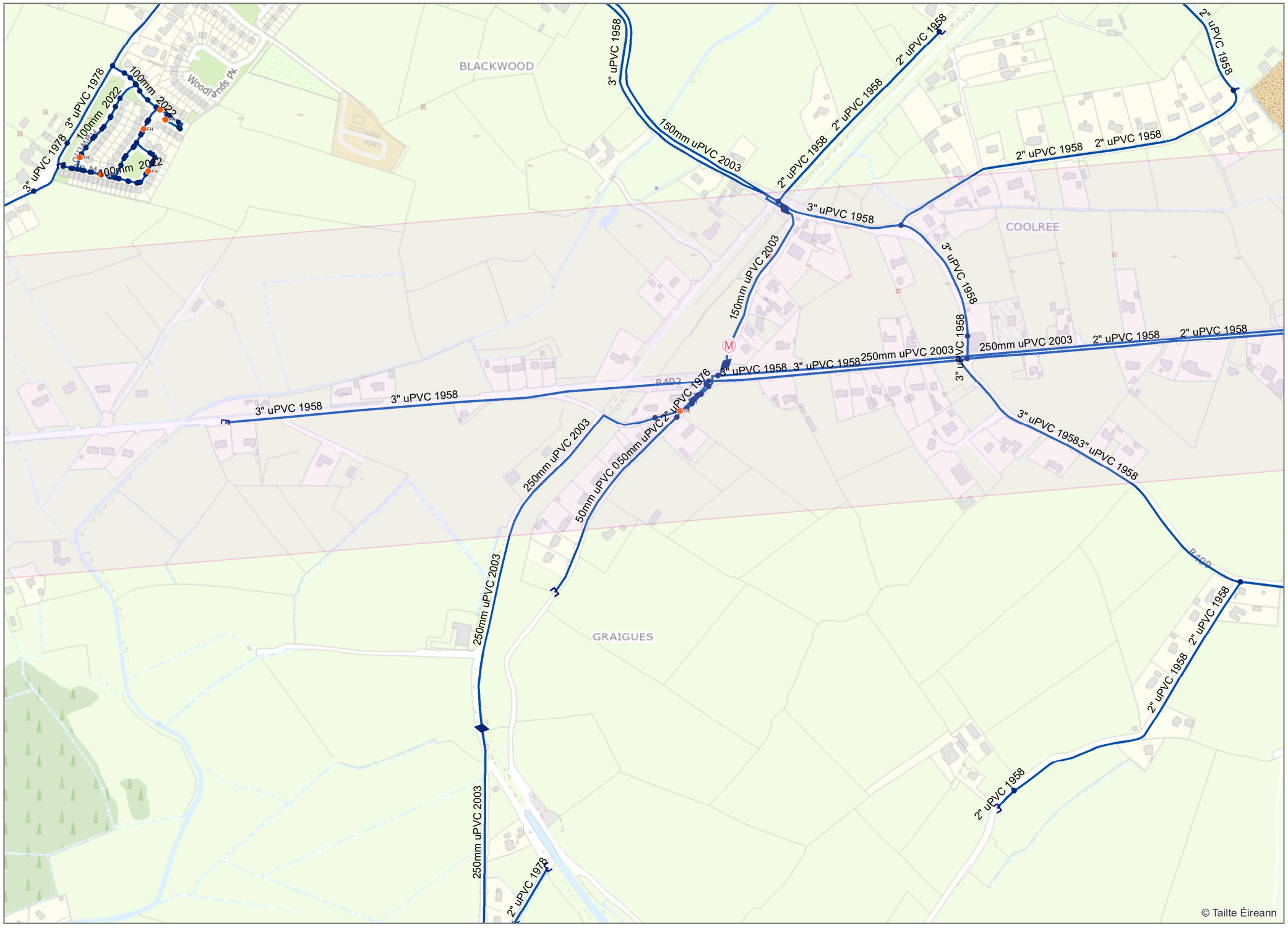
- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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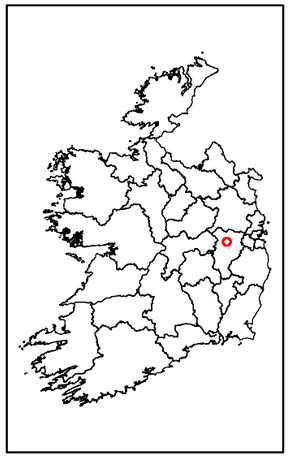
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Water Network - F10

Uisce Éireann
Irish Water



Legend

- Proposed Development Boundary

Flow Control Valves

- PRV

Air Control Valves

- Air Control Valves

Boundary Meter

- District (Boundary Meter)

Water Hydrants

- Fire Hydrant

Water Fittings

- Cap
- Other Fitting

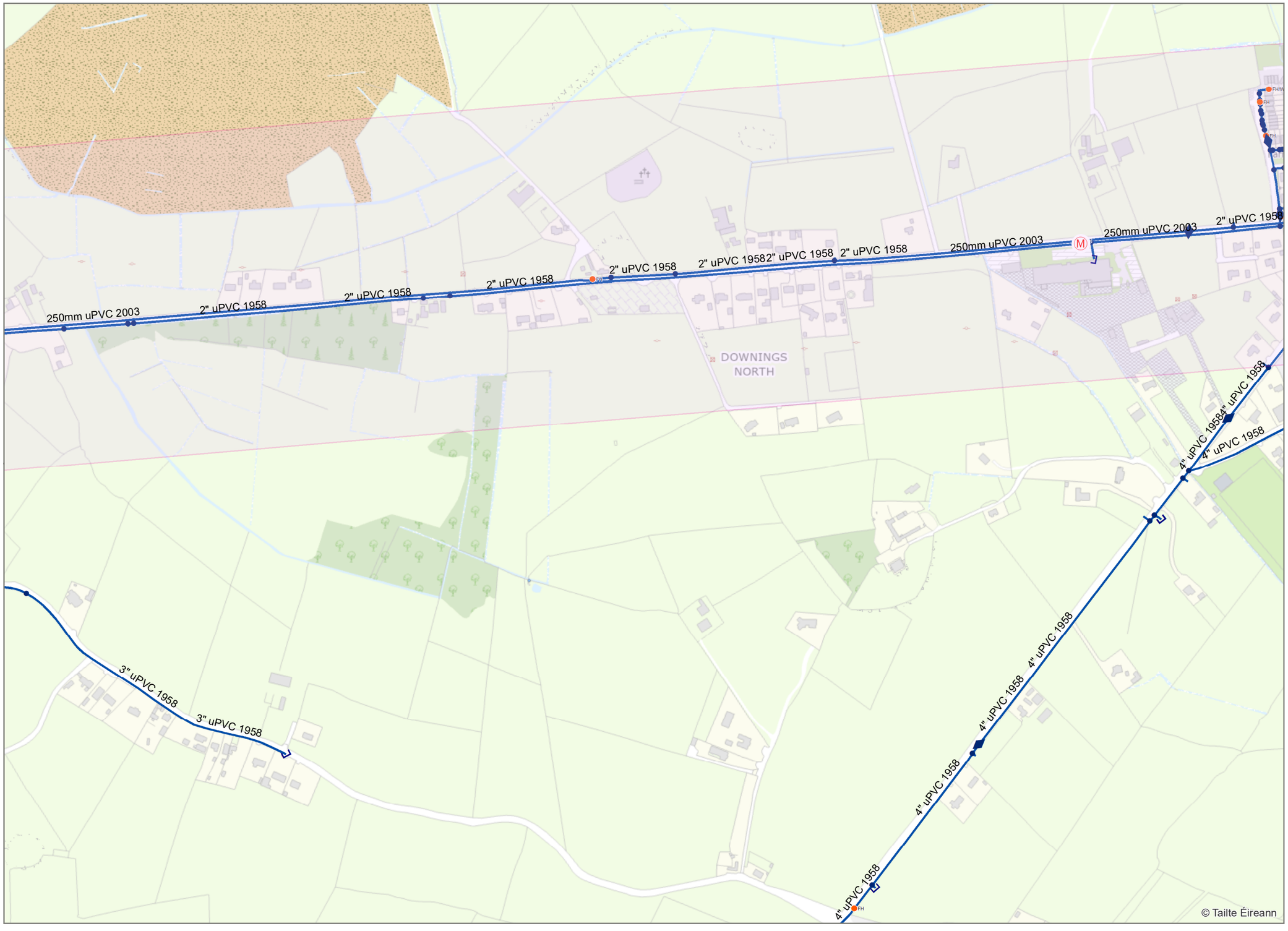
Water Mains(Irish Water Owned)

- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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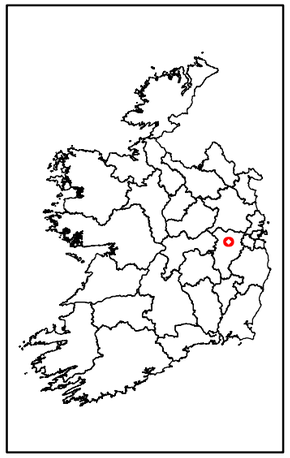
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Water Network - F11

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Boundary Meter

District (Boundary Meter)

Water Hydrants

Fire Hydrant

Fire Hydrant/Washout

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

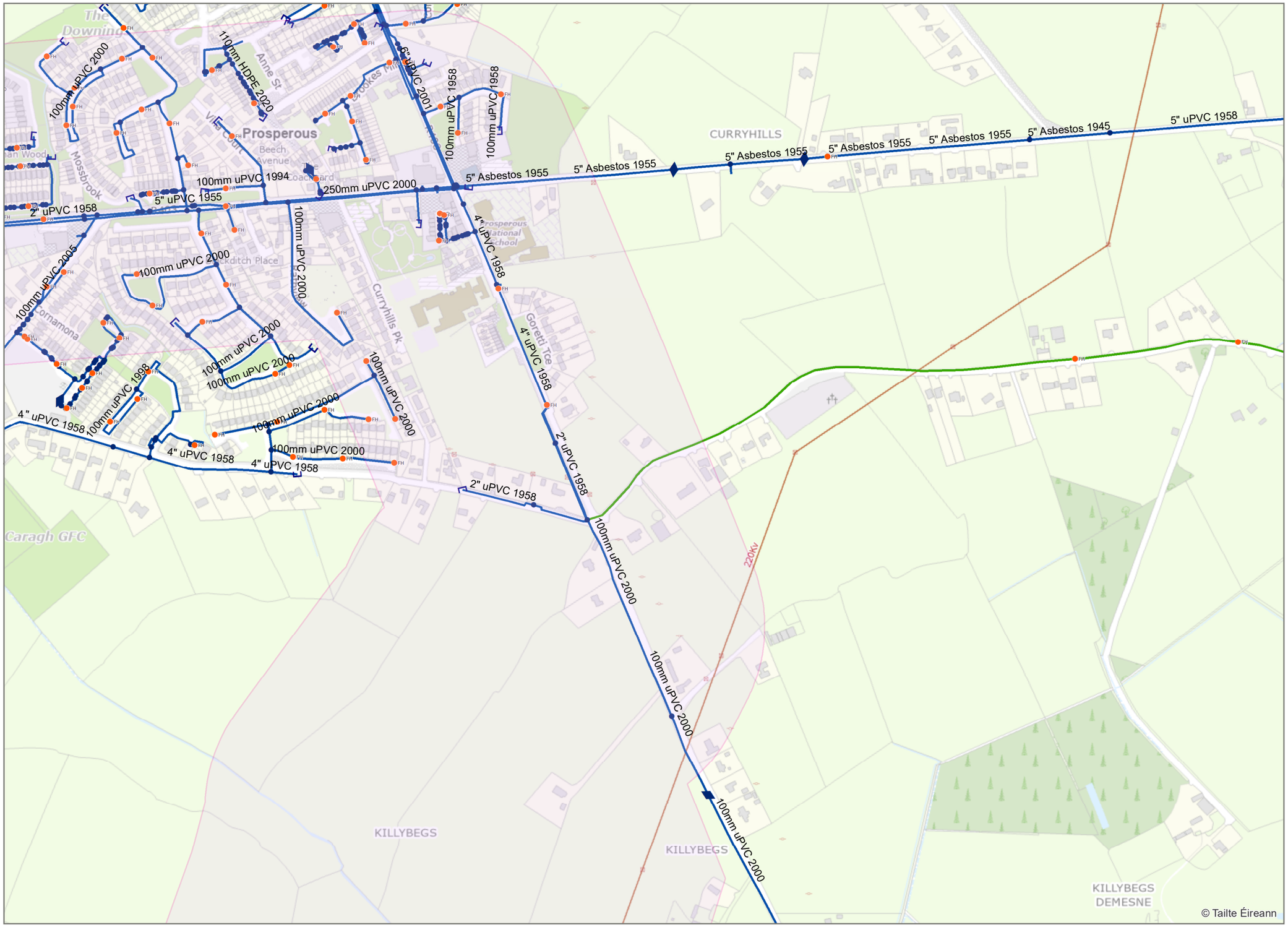
Potable Water

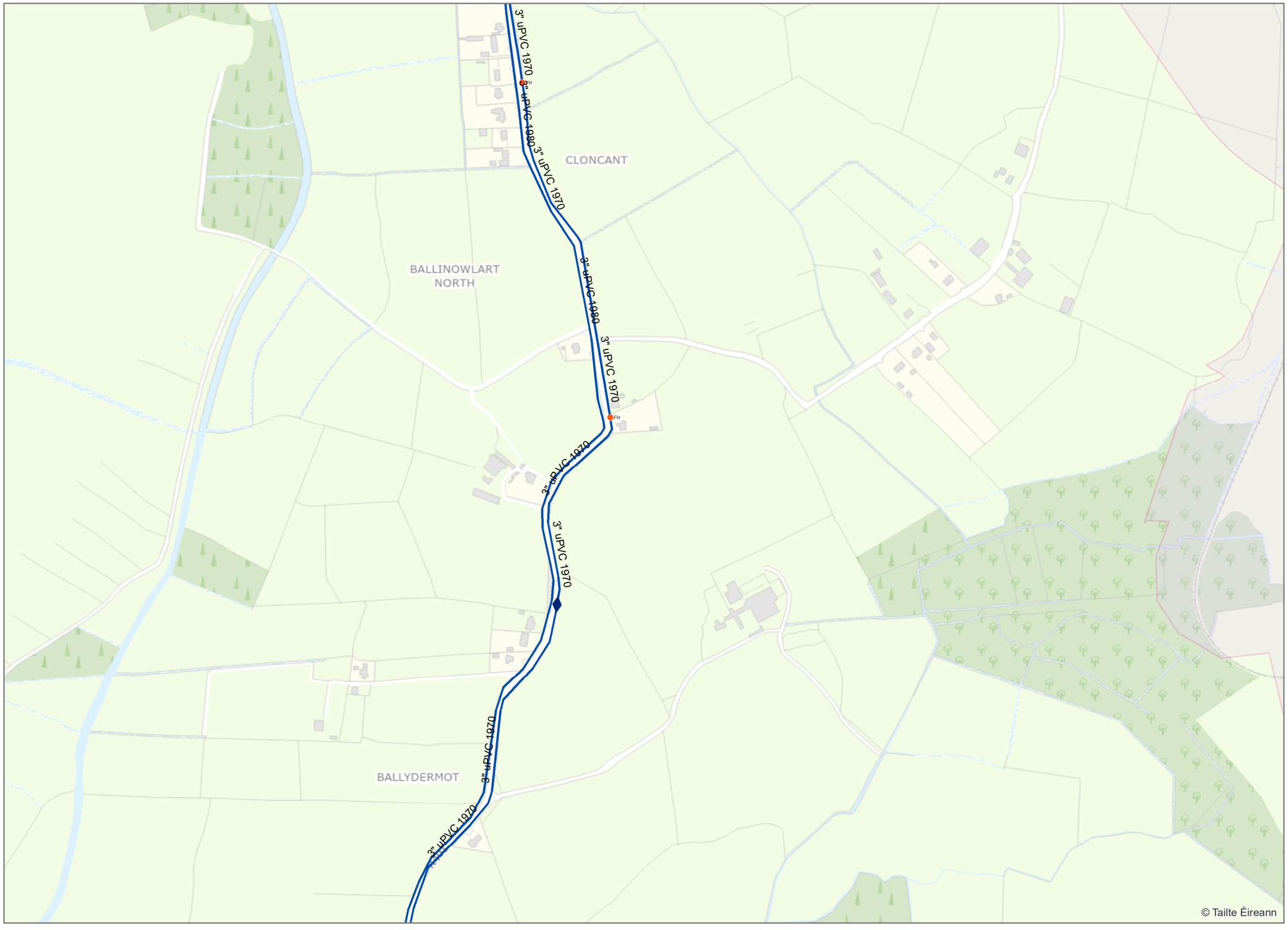
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT


Prosperous
CURRYHILLS
KILLYBEGS
KILLYBEGS
KILLYBEGS DEMESNE
Caragh GFC
Prosperous National School
Curryhills Pk
Goretti Tce
Anne St
Beech Avenue
Coach Rd
Mossbrook
Cormamona
Skidtch Place
220Kv
5" Asbestos 1955
5" Asbestos 1955
5" Asbestos 1955
5" Asbestos 1955
5" Asbestos 1945
5" uPVC 1958
5" uPVC 1955
2" uPVC 1958
250mm uPVC 2000
100mm uPVC 1994
100mm uPVC 2000
100mm uPVC 2000
100mm uPVC 2000



N

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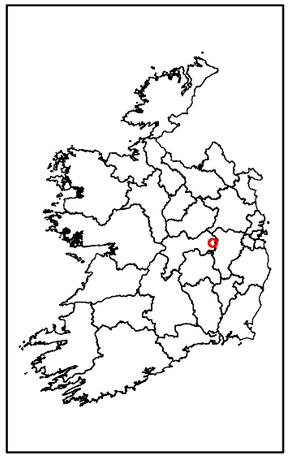
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Water Network - G1

Uisce Éireann
Irish Water



Legend

- Proposed Development Boundary

Air Control Valves

- Air Control Valves

Water Hydrants

- FH Fire Hydrant

Water Mains(Irish Water Owned)

- Potable Water

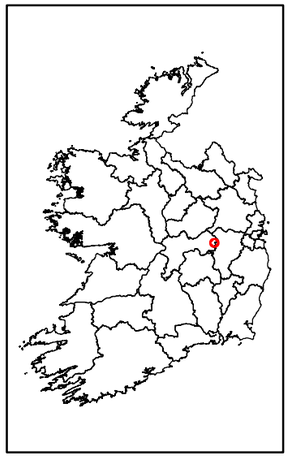
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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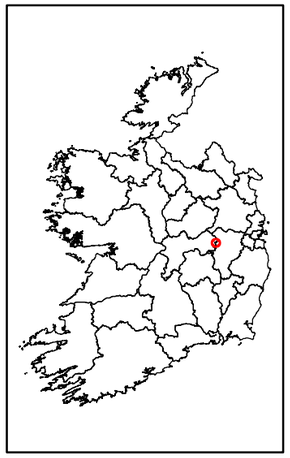
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Water Network - G2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT

N

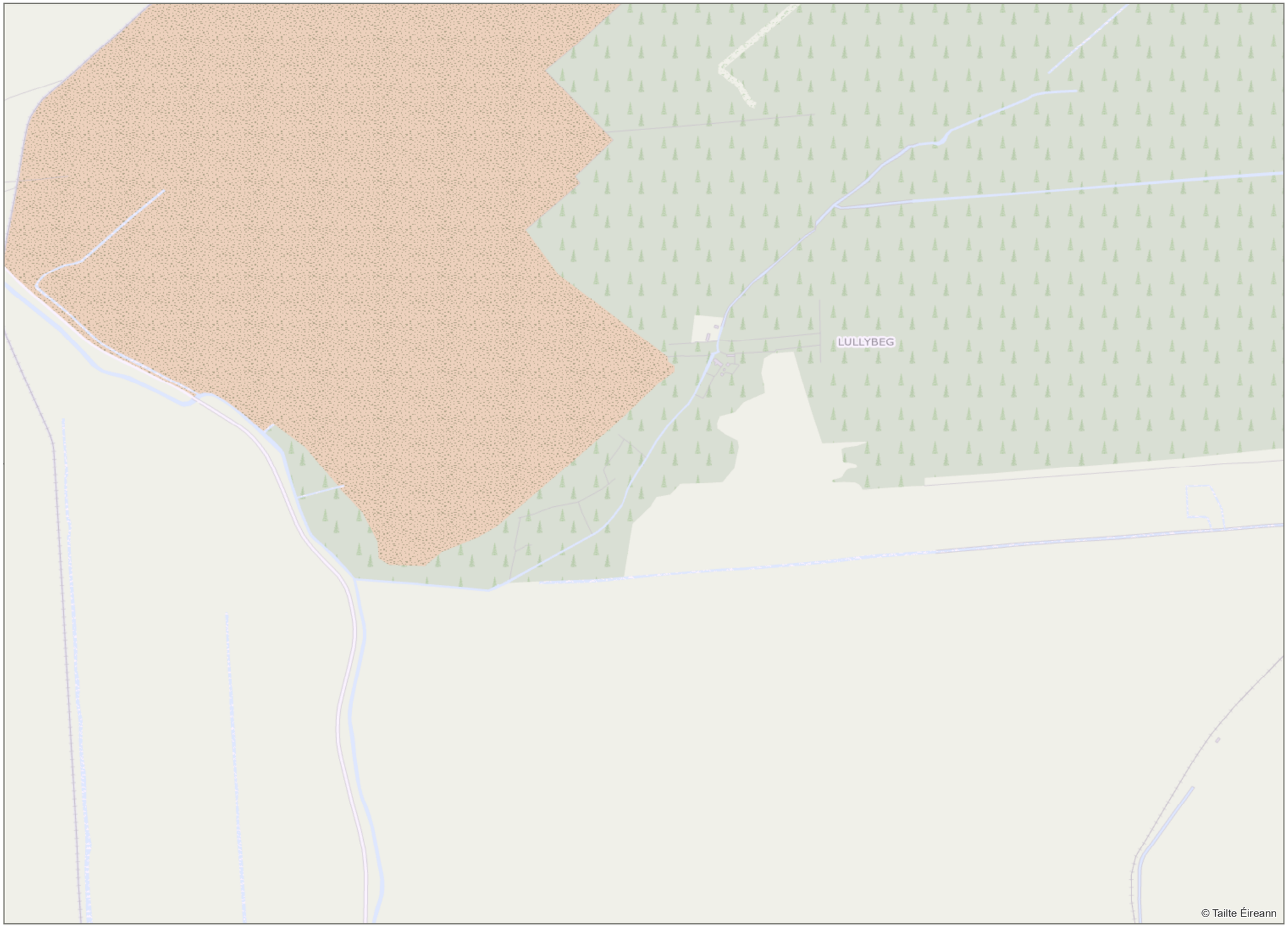
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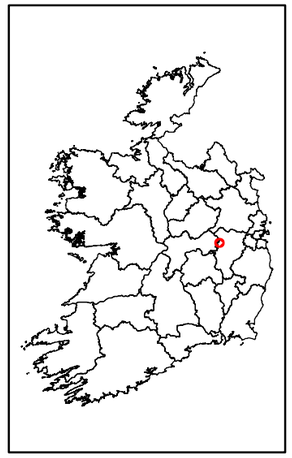
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Water Network - G3





Uisce Éireann
Irish Water

Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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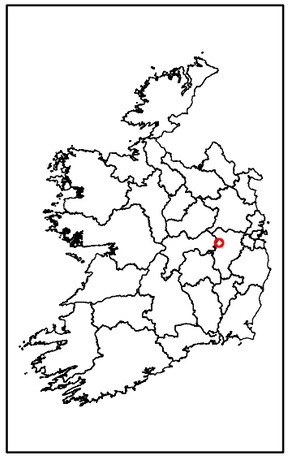
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Water Network - G4



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Hydrants

Fire Hydrant

Water Fittings

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

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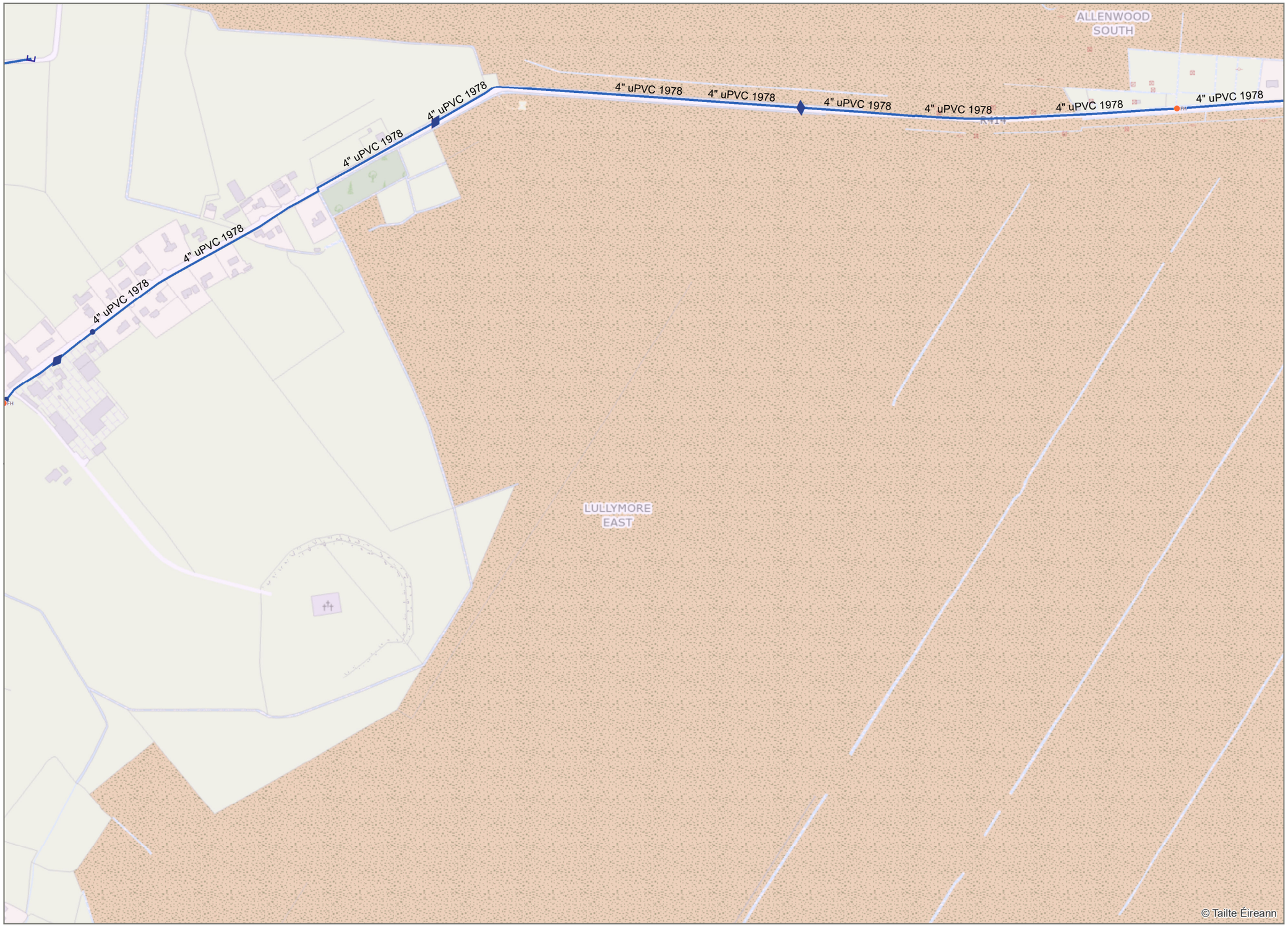
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Water Network - G5



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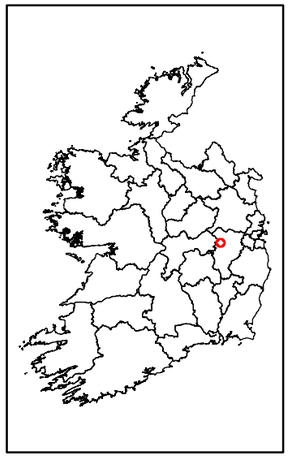
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Water Network - G6

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Hydrants

Fire Hydrant

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

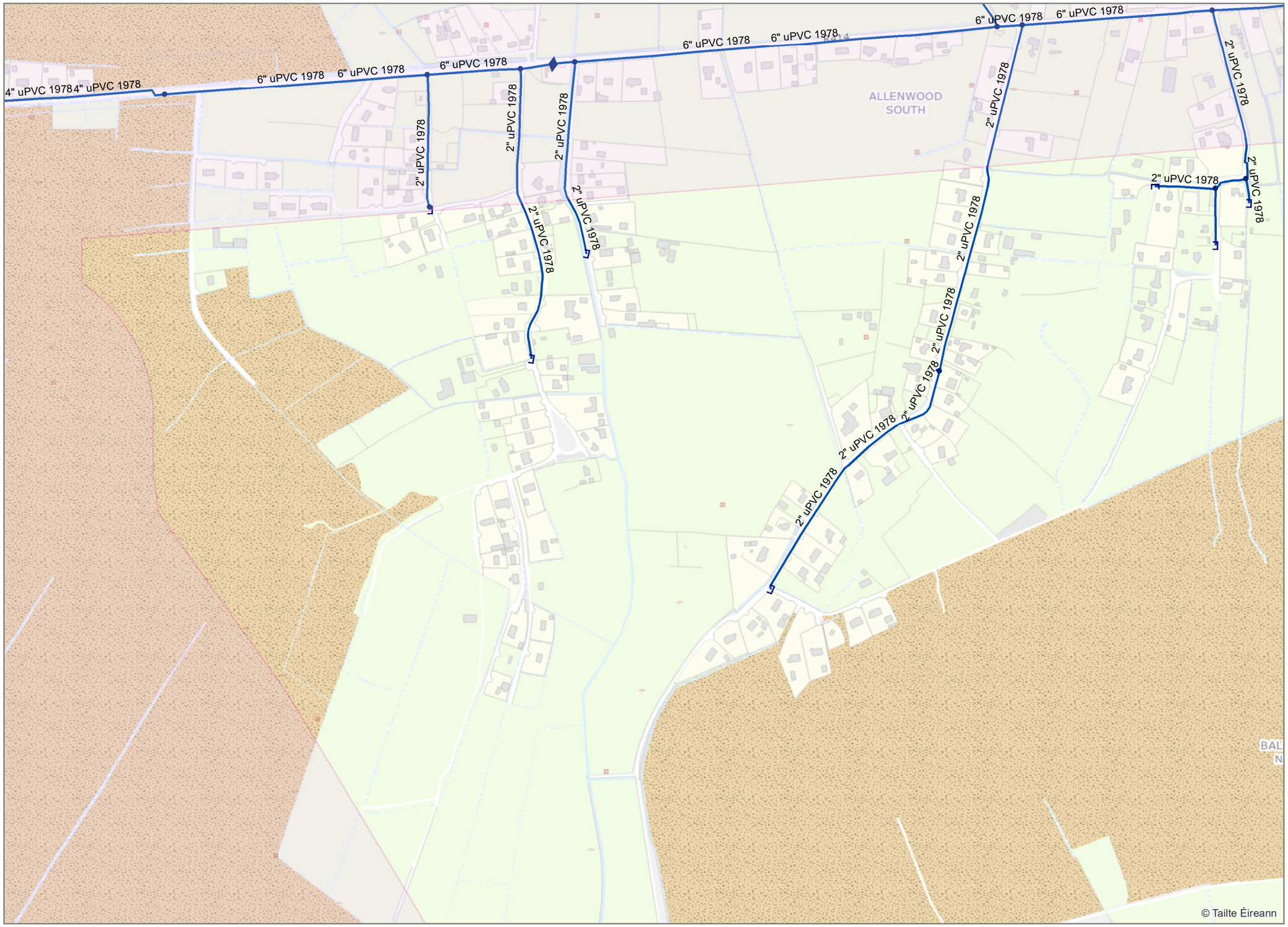
Potable Water

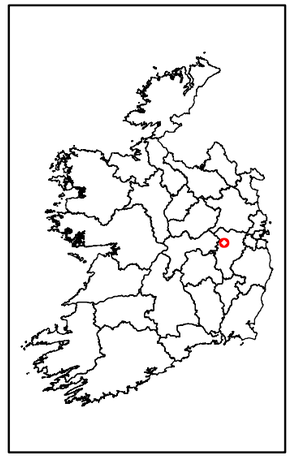
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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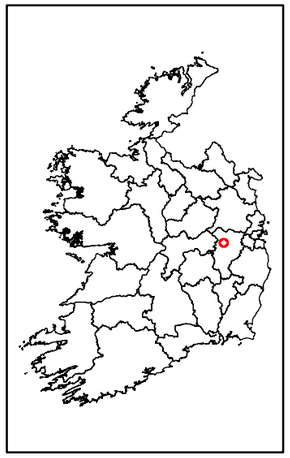
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Water Network - G7

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Hydrants

Fire Hydrant

Washout

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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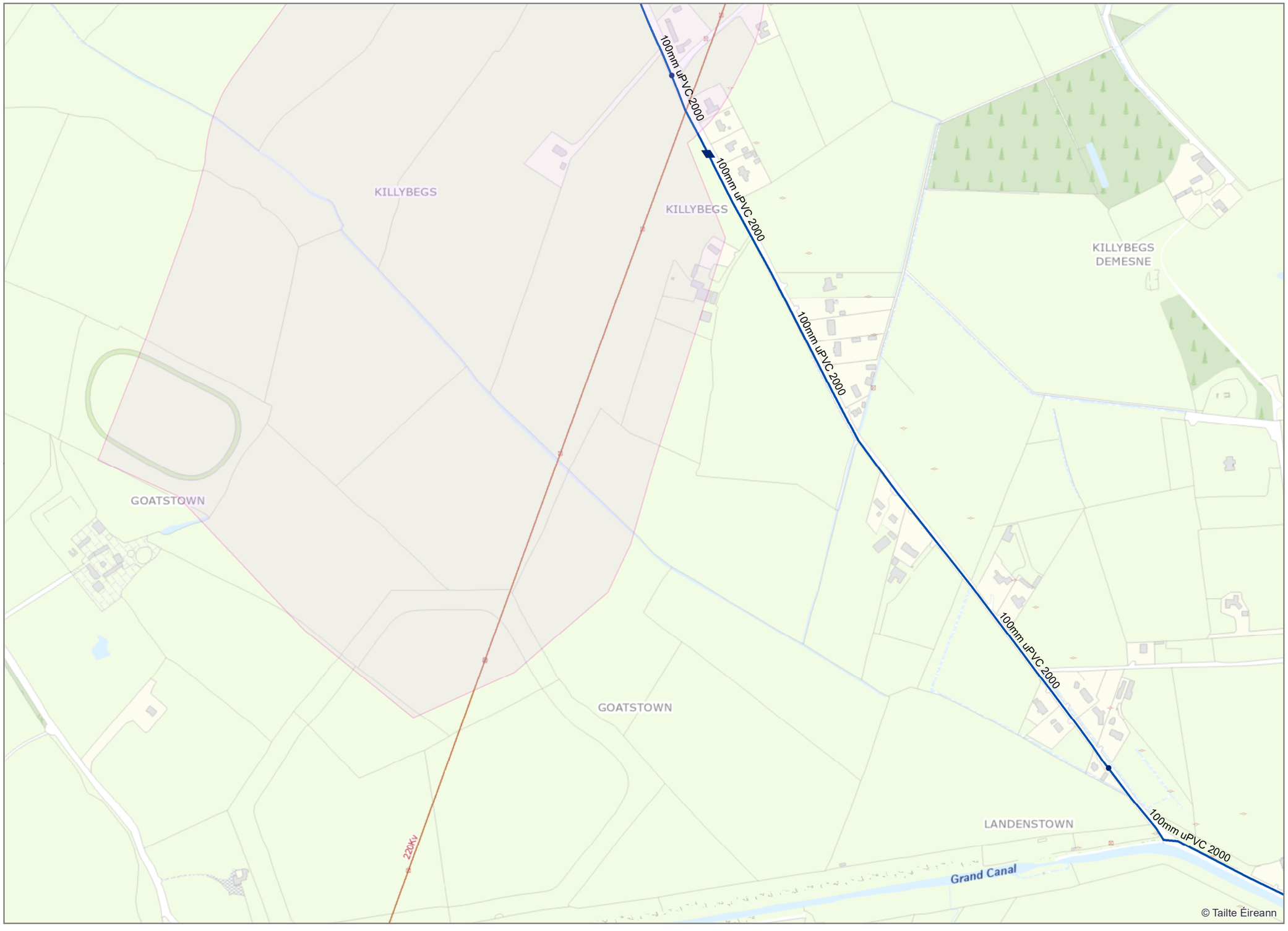
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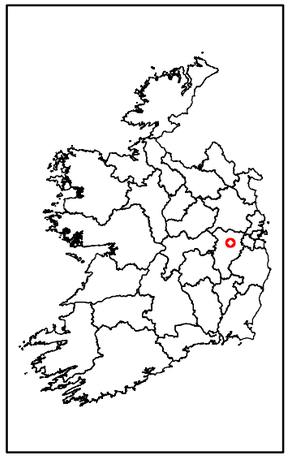
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Water Network - G8

© Tailte Éireann



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Air Control Valves

Air Control Valves

Water Fittings

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
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Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
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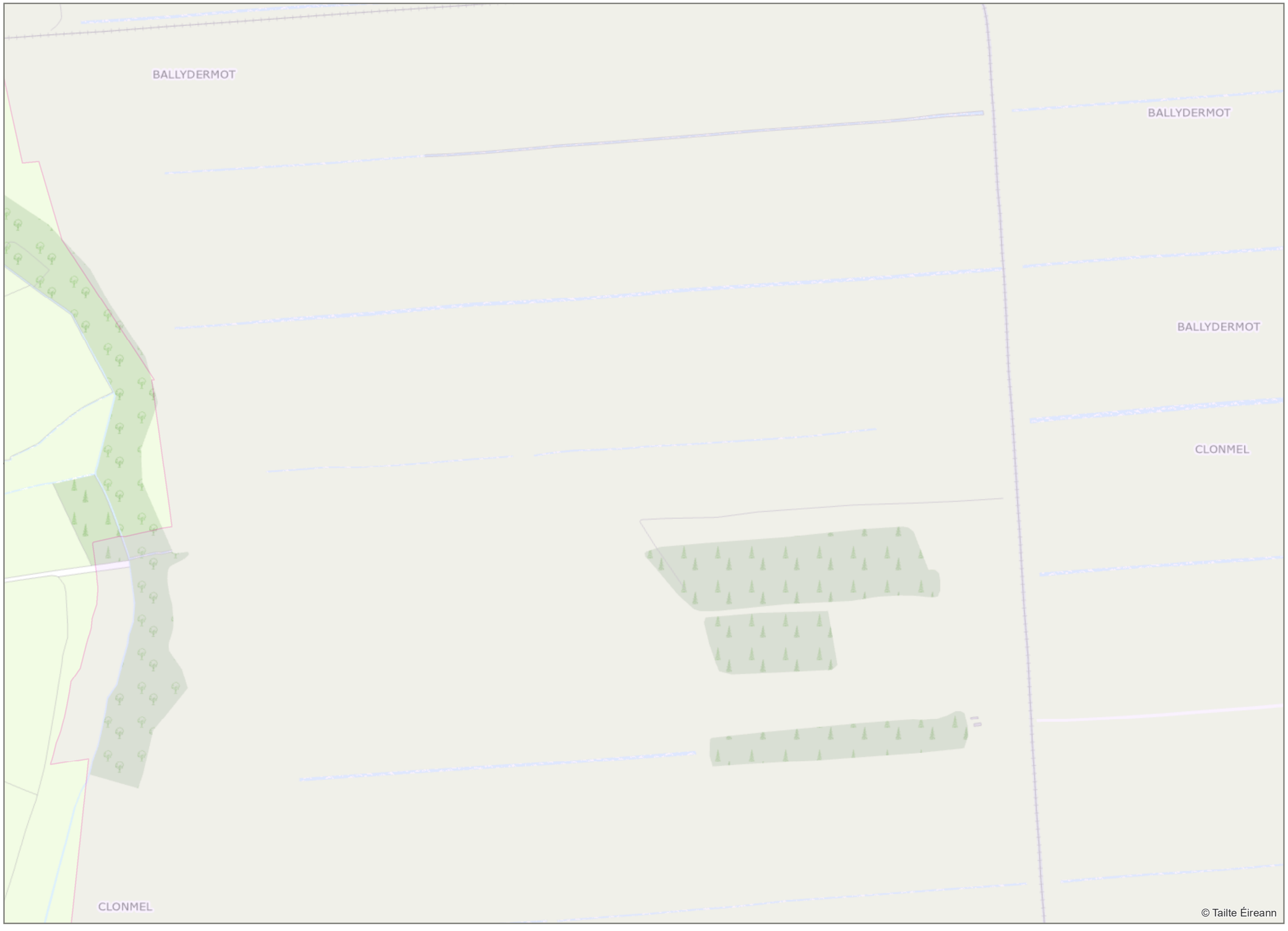
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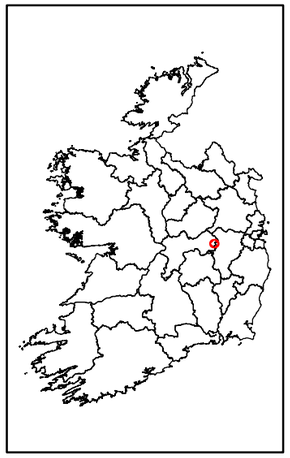
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Water Network - G12



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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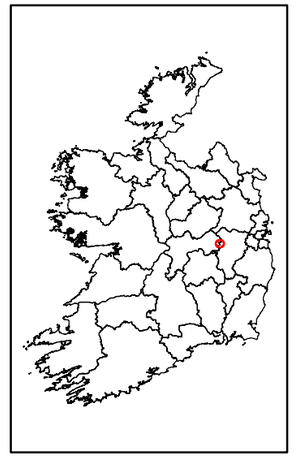
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Water Network - H2





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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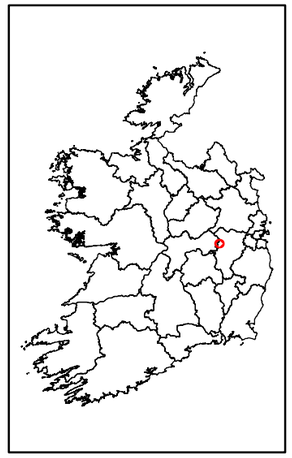
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Water Network - H3



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT

N

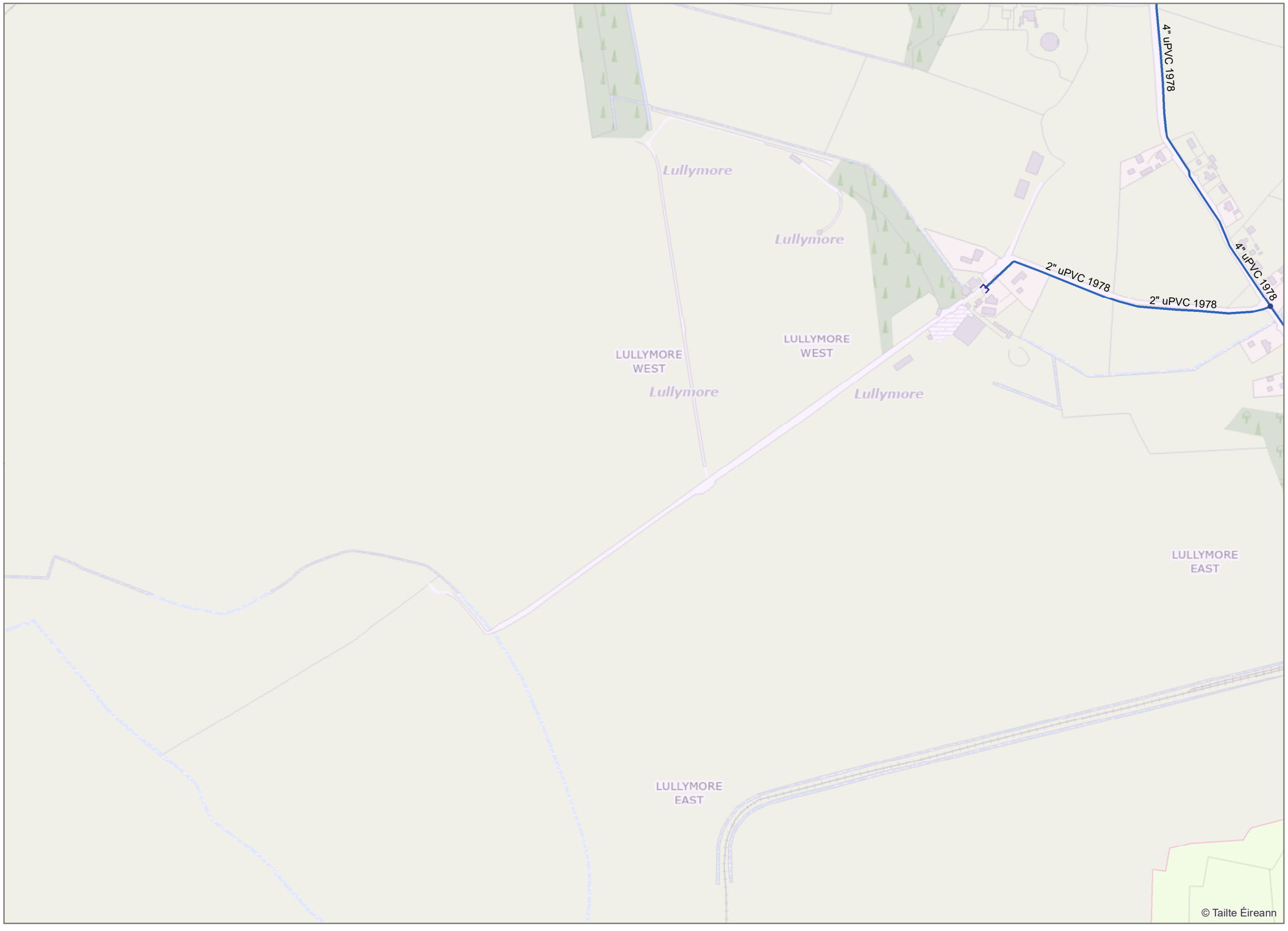
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Water Network - H4



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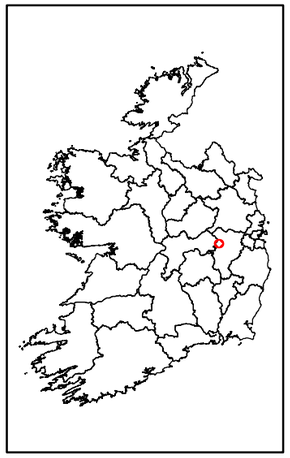
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Water Network - H5

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

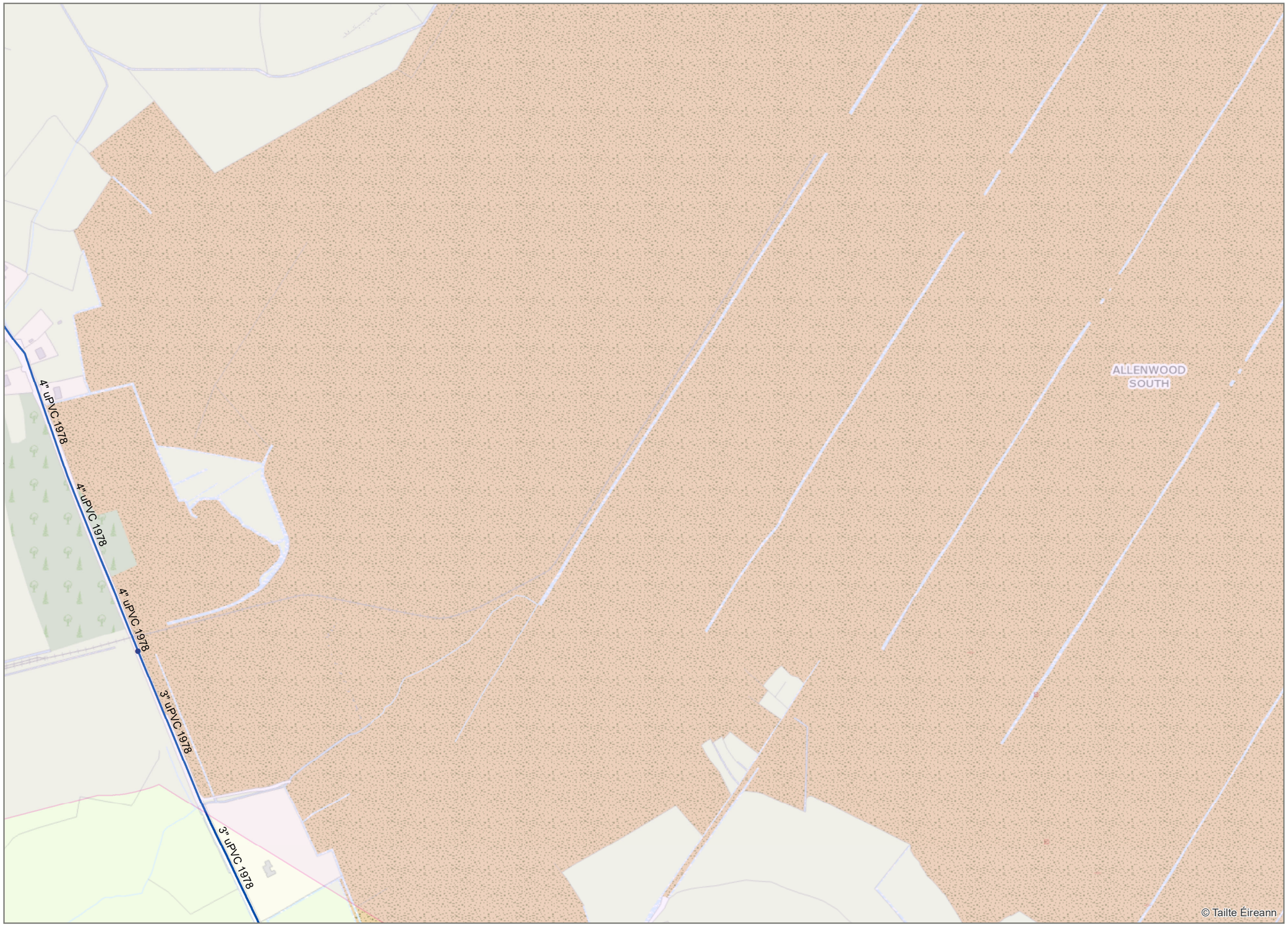
Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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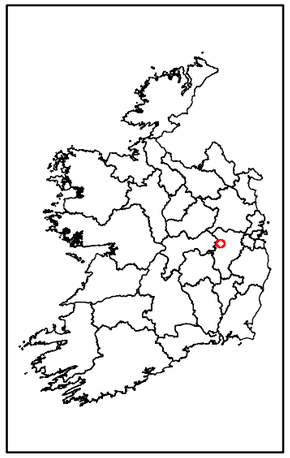
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Water Network - H6

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

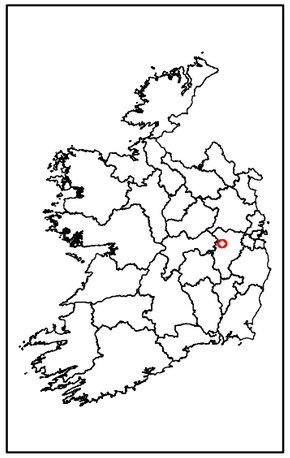
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
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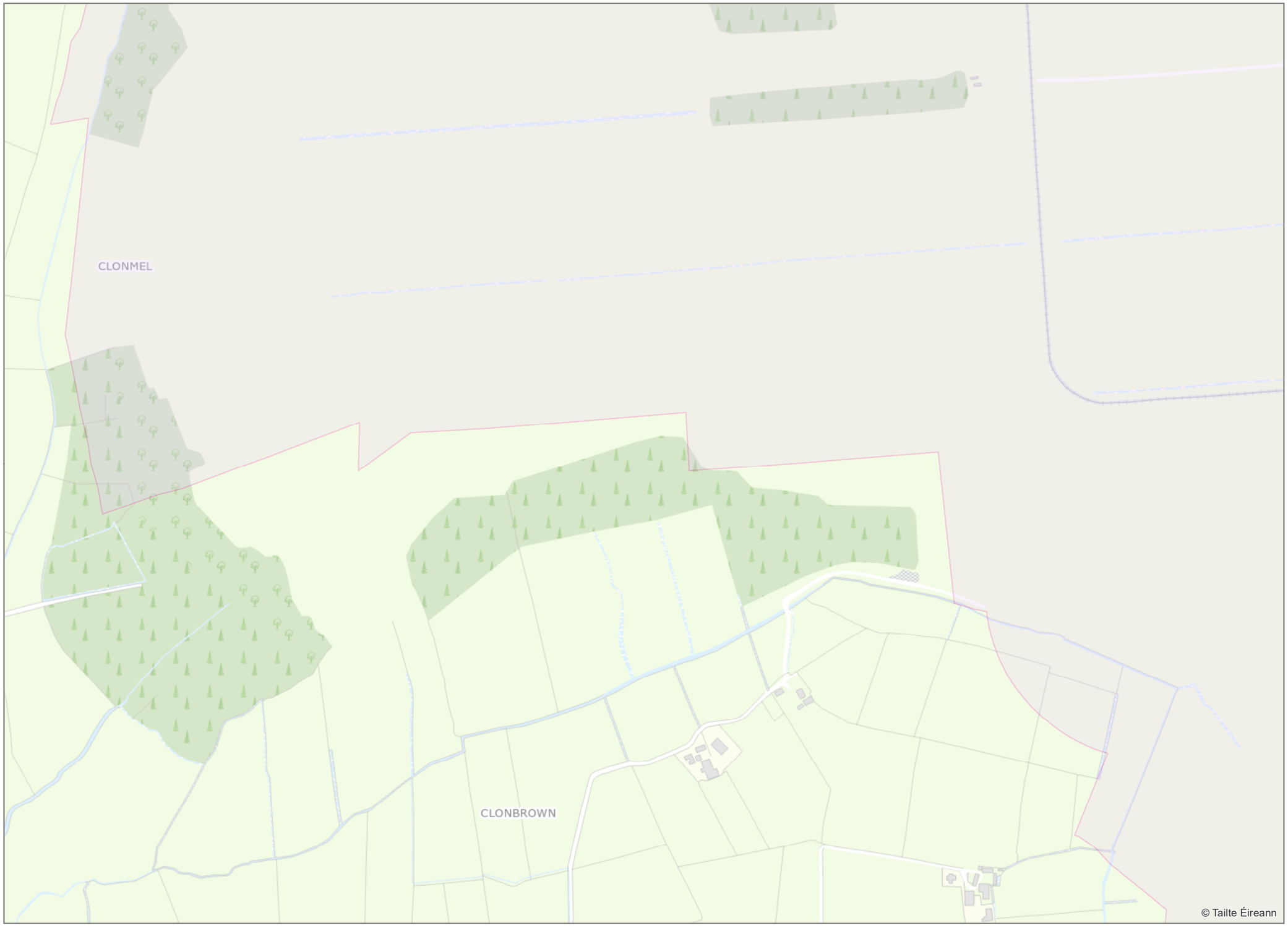
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Water Network - H7



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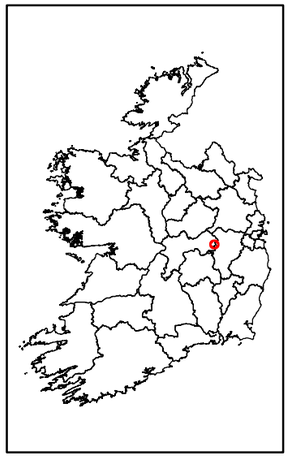
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Water Network - I2

Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

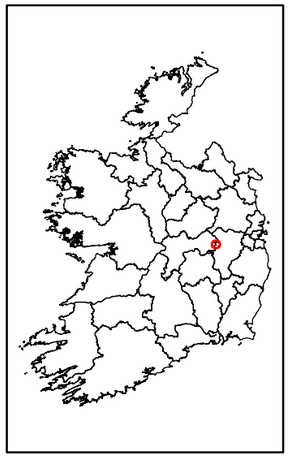
0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

DRAFT





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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Water Network - I3



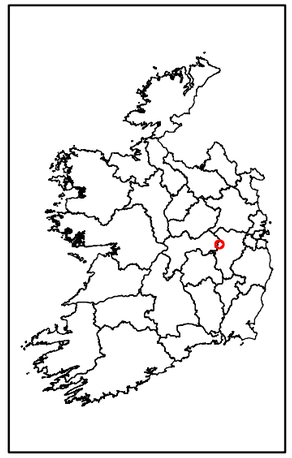
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Water Network - I4



Legend

Proposed Development Boundary

0 45 90 180 m

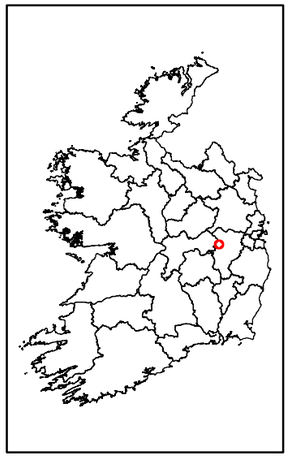
Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
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Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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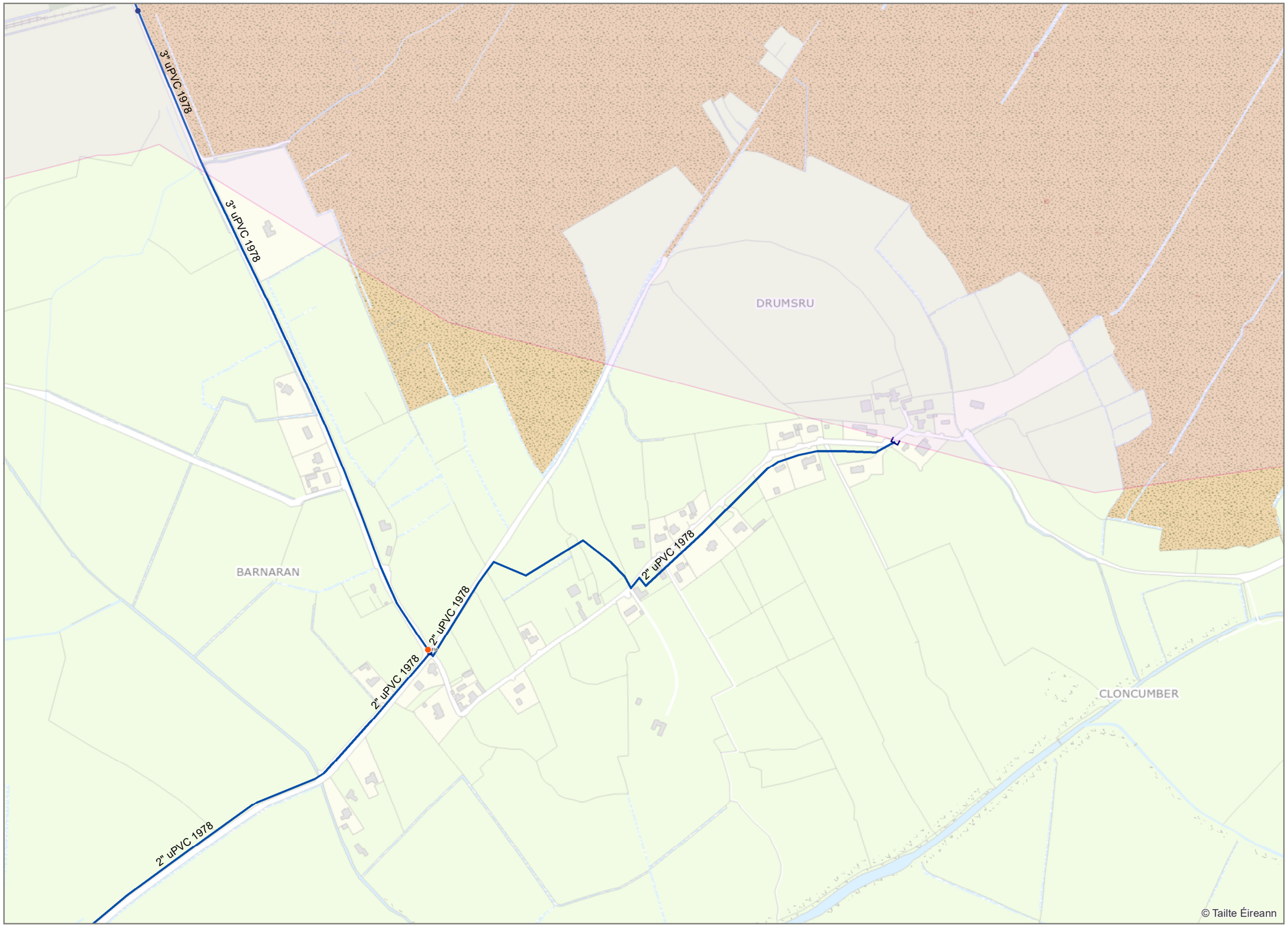
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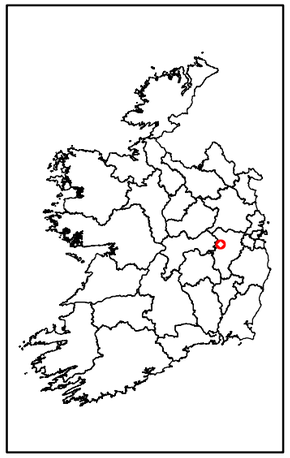
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Water Network - I5





Legend

Proposed Development Boundary

Water Hydrants

Fire Hydrant

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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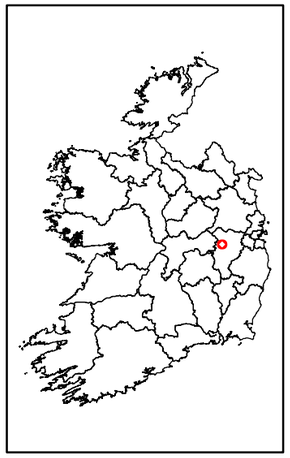
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Water Network - I6



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

- Cap
- Other Fitting

Water Mains(Irish Water Owned)

- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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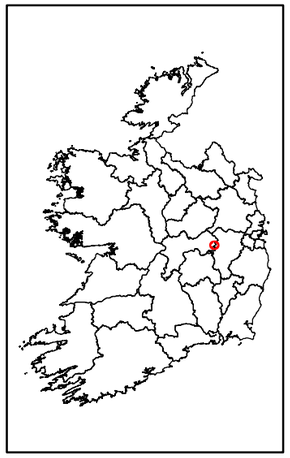
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Water Network - I7



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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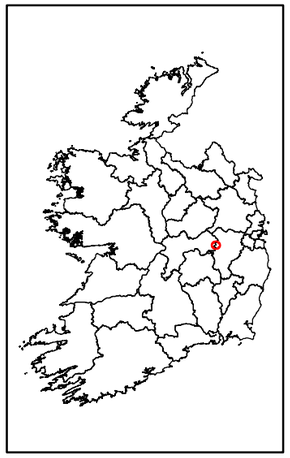
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Water Network - J2



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid Projection: Transverse Mercator	
Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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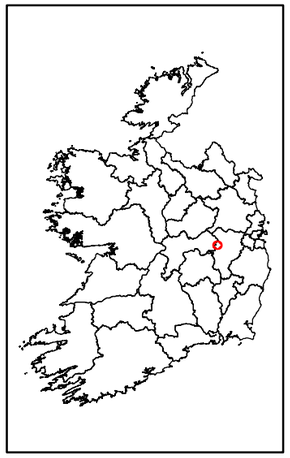
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Water Network - J3





Legend

Proposed Development Boundary

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	1:5,930
Drawing No.:	IW-AGG-2018-000
Drawn By:	JJ
Checked By:	<Add Name>
Approved By:	<Add Name>
Drawn Date	21/04/2026
Checked Date:	<dd/mm/yyyy>
Approved Date:	<dd/mm/yyyy>

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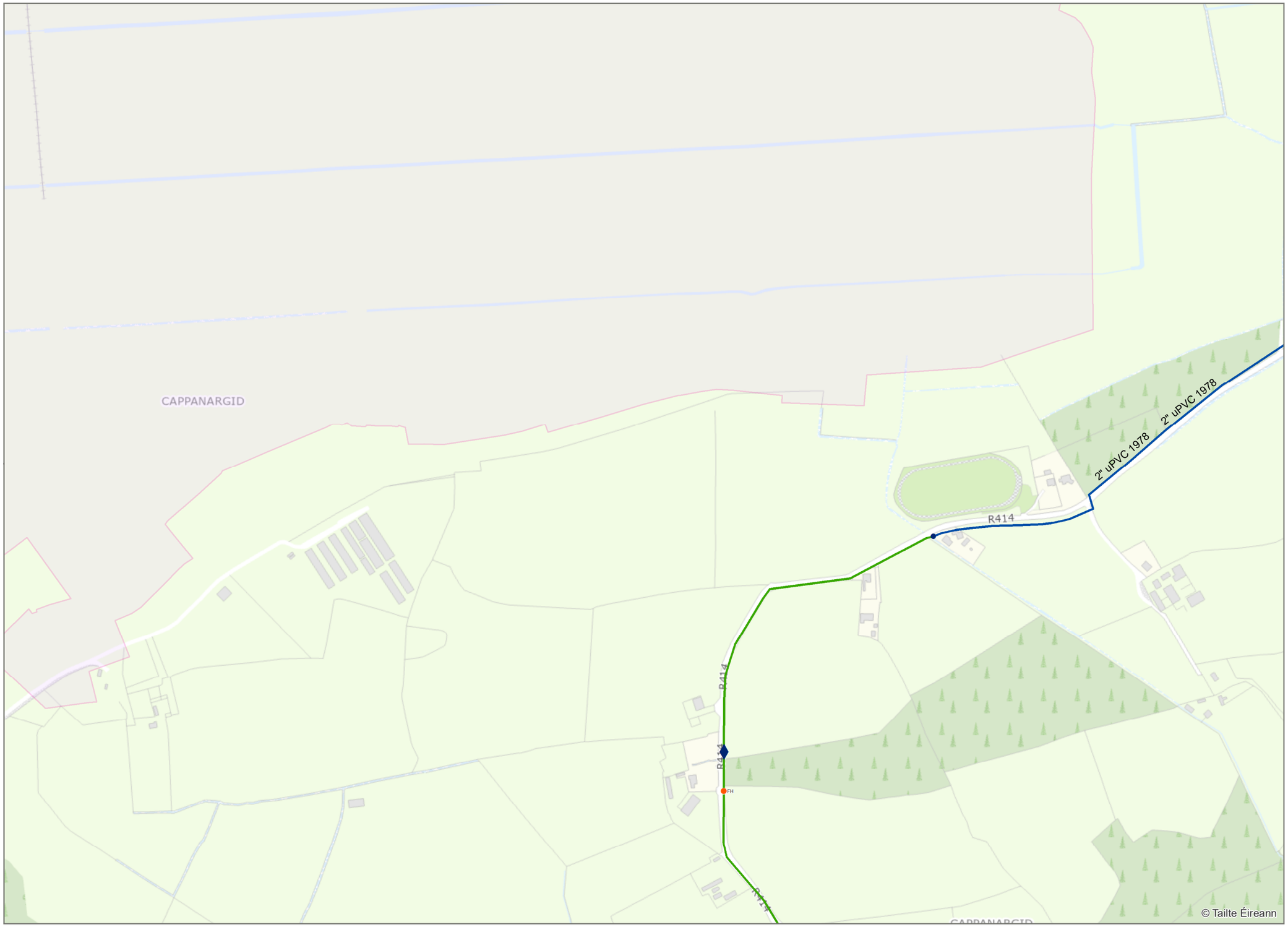
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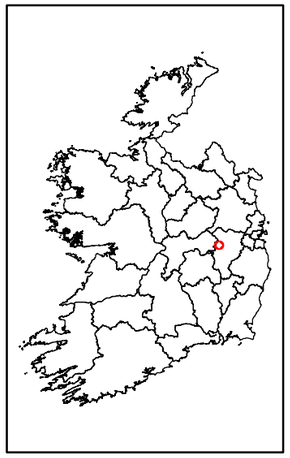
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Water Network - J4





Legend

- Proposed Development Boundary

Air Control Valves

- Air Control Valves

Water Hydrants

- Fire Hydrant

Water Fittings

- Other Fitting

Water Mains(Irish Water Owned)

- Potable Water

Water Mains(Non Irish Water Owned)

- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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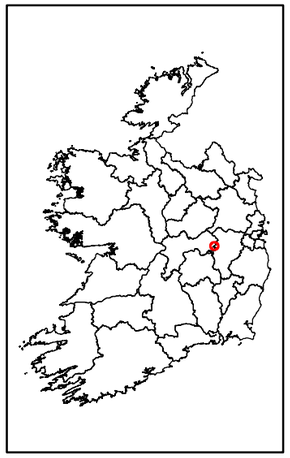
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Water Network - J5



Uisce Éireann
Irish Water



Legend

- Proposed Development Boundary

Water Hydrants

- FH Fire Hydrant

Water Fittings

- Cap

Water Mains(Irish Water Owned)

- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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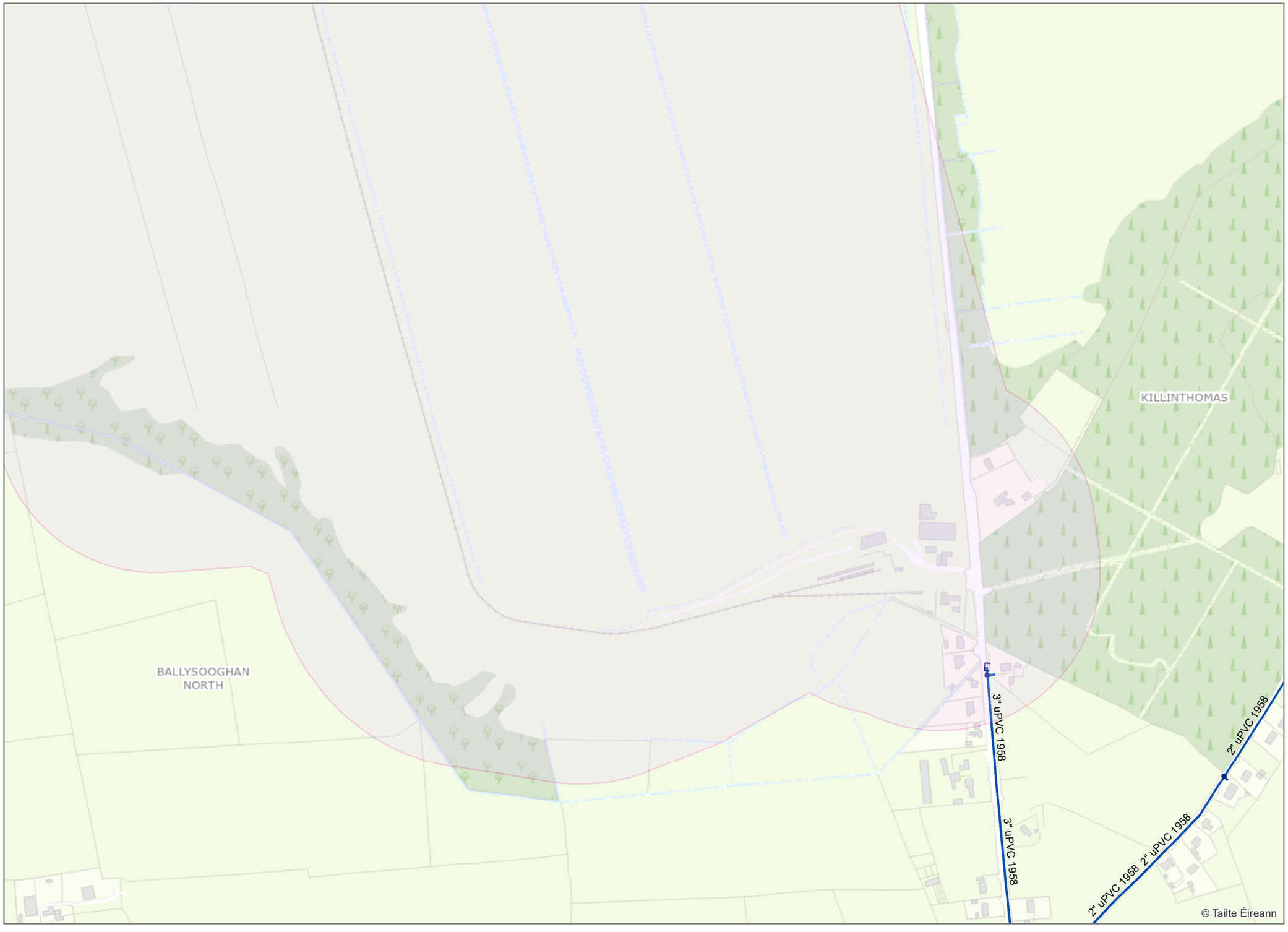
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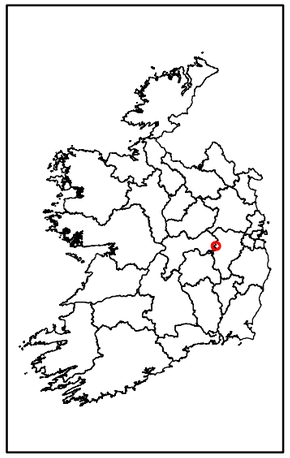
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Water Network - K2





Legend

Proposed Development Boundary

Water Fittings

- Cap
- Other Fitting

Water Mains(Irish Water Owned)

- Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
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Drawn Date	**21/04/2026**
Checked Date:	**<dd/mm/yyyy>**
Approved Date:	**<dd/mm/yyyy>**

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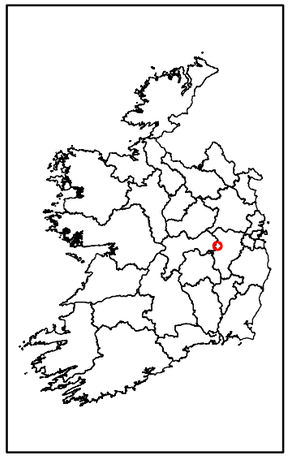
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Water Network - K3



Uisce Éireann
Irish Water



Legend

Proposed Development Boundary

Water Fittings

Cap

Other Fitting

Water Mains(Irish Water Owned)

Potable Water

0 45 90 180 m

Coordinate System: TM65 Irish Grid
Projection: Transverse Mercator

Scale @ A3:	**1:5,930**
Drawing No.:	**IW-AGG-2018-000**
Drawn By:	**JJ**
Checked By:	**<Add Name>**
Approved By:	**<Add Name>**
Drawn Date	**21/04/2026**
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Approved Date:	**<dd/mm/yyyy>**

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Water Network - K4

TELECOMS SCOPING ROUND 1 - 2020 RESPONSES

Shaun Doolin

From: John Bagnall <john.bagnall@eir.ie>
Sent: Friday 17 July 2020 18:13
To: Karen Mulryan
Cc: seamus.okeeffe@openeir.ie; Thomas Sheridan; Mobile Networks TXN
Subject: Re: 191136 Ballydermot Proposed Wind Farm at the Offaly-Kildare Border

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen,

We have one transmission link within the proposed area that could be at risk, the end points of the transmission link are below, for windfarm developments we would keep a buffer of 100meters radius away from this transmission path.

Link 1 – End point 1 - 53°17'41.80"N 7° 4'55.84"W, End point 2 – 53°21'21.15"N 6°58'14.85"W

Please keep sending future windfarm development analysis and large infrastructure project requests to MobileNetworksTXN@eir.ie for Eir Mobile (formerly Meteor) network analysis.

Kind regards,

John Bagnall
Transmission Design & Engineering

M: +353 85 1053746
E: john.bagnall@eir.ie
Address: EirCode - D24 HX03

On Tue, 14 Jul 2020 at 10:34, Karen Mulryan <kmulryan@mkoireland.ie> wrote:

> Good morning Seamus,
>
> We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
>
> Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.
>
> We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.
>
> Kind regards,
>
> Karen.

Karen Mulryan
Environmental Scientist
MKO

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

www.mkoireland.ie

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Shaun Doolin

From: Paul Marron <paul.marron@eir.ie>
Sent: Tuesday 14 July 2020 11:06
To: Karen Mulryan
Cc: John Bagnall
Subject: Re: 191136 Proposed Wind Farm at Ballydermot, Offaly-Kildare Border

No problem Karan, the TX engineers in eir work as a team over the whole country so we don't have specific areas. We're more project split than location. John is the best contact regardless of location.
Thanks,
Paul

On Tue, 14 Jul 2020 at 10:45, Karen Mulryan <kmulryan@mkoireland.ie> wrote:

> Hi Paul,
>
> That's no problem, thank you very much.
>
> We do usually contact John but Comreg sent me a list of email addresses to contact and they have your name down as an operator in the Offaly-Kildare area.
>
> Any information is greatly appreciated.
>
> Thanks again,
>
> Karen.

Karen Mulryan
Environmental Scientist

MKO

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

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From: Paul Marron <paul.marron@eir.ie>
Sent: 14 July 2020 10:40
To: Karen Mulryan <kmulryan@mkoireland.ie>; John Bagnall <John.Bagnall@eir.ie>
Subject: Fwd: 191136 Proposed Wind Farm at Ballydermot, Offaly-Kildare Border

HI Karen,

I'm going to pass your request onto my colleague John Bagnall (copied). He looks after wind farm analysis for eir mobile transmission.

Regards,

Paul

---------- Forwarded message ---------
From: **Karen Mulryan** <kmulryan@mkoireland.ie>
Date: Tue, 14 Jul 2020 at 10:19
Subject: 191136 Proposed Wind Farm at Ballydermot, Offaly-Kildare Border
To: Paul.Marron@eir.ie <Paul.Marron@eir.ie>

Good morning Paul,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.

Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

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Paul Marron

Transmission Engineer

Eir Mobile Networks

2022 Bianconi Ave, Citywest, Dublin 24.

www.eir.ie

Mobile: 0876548499 ¦ **Email**: paul.marron@eir.ie

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Paul Marron

Transmission Engineer

Eir Mobile Networks

2022 Bianconi Ave, Citywest, Dublin 24.

www.eir.ie

Mobile: 0876548499 ¦ **Email**: paul.marron@eir.ie

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Shaun Doolin

From: Dominic Crudden <dominic.crudden@emrsolutions.ie>
Sent: Thursday 18 February 2021 13:12
To: Karen Mulryan
Subject: RE: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Karen,

None of the radio links in our network would be affected by a wind development at these sites, so we would not have an issue with the proposal.

https://emr.ie/industries/renewable-energy

Kind regards,

Dominic Crudden
Business Development Manager at EMR Integrated Solutions

Direct: +353-1-255 2056 Phone: +353-1-801 3131
Mobile: +353-86-771-2819 Web: www.emr.ie

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From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: Tuesday 2 February 2021 11:00
To: Dominic Crudden <dominic.crudden@emrsolutions.ie>; info <info@emrsolutions.ie>
Subject: 191136 Proposed Bord na Móna Powergen Ltd Wind Farm Development at Ballydermot, Co. Offaly & Co. Kildare

Good morning,

MKO is preparing an Environmental Impact Assessment Report (EIAR) for a proposed Bord na Móna Powergen Development Ltd wind energy development at Ballydermot and the surrounding townlands located at the Offaly-Kildare border. The proposed development will be located on 14 bogs and will be referred to as the Ballydermot Wind Farm. The site is located 2.2km south-southeast of Edenderry, 3.3km west of Allenwood, 2km north of Rathangan and 1.7km east of Clonbullogue Village.

The proposed project will likely encompass 50-60 turbines and will have an output of at least over 50 megawatts. Should the final project be of this scale, an application will be made to An Bord Planeála seeking a determination in relation to the SID status, or otherwise, of the proposed wind energy development. If the board determine that the development is indeed SID, the planning application will be submitted directedly to An Bord Planeála, under the provision of the Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, an application for planning permission will be made to Offaly and Kildare County Councils.

As part of the EIA process, we would welcome any comments that you may 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. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is attached.

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.

The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

McCarthy Keville O'Sullivan Ltd. T/A MKO. Registered in Ireland No. 462657. VAT No. IE9693052R

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Shaun Doolin

From: Peter O`Brien <peter.obrien@enet.ie>
Sent: Tuesday 14 July 2020 13:21
To: Karen Mulryan
Cc: William Morgan
Subject: RE: 191136 Ballydermot proposed Wind Farm on the Offaly-Kildare border.

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen,

About 100m please,

Best Regards,
Peter

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday, July 14, 2020 1:18 PM
To: Peter O`Brien <peter.obrien@enet.ie>
Cc: William Morgan <william.morgan@enet.ie>
Subject: RE: 191136 Ballydermot proposed Wind Farm on the Offaly-Kildare border.

Thanks Peter,

Do you have a required set back distance from this link?

Regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Peter O`Brien <peter.obrien@enet.ie>
Sent: 14 July 2020 12:54
To: Karen Mulryan <kmulryan@mkoireland.ie>

Cc: William Morgan <william.morgan@enet.ie>
Subject: RE: 191136 Ballydermot proposed Wind Farm on the Offaly-Kildare border.

Hi Karen,

See below, the link does pass through the boundary area you sent me:



Regards,
Peter

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday, July 14, 2020 12:48 PM
To: Peter O`Brien <peter.obrien@enet.ie>

Cc: William Morgan <william.morgan@enet.ie>
Subject: 191136 Ballydermot proposed Wind Farm on the Offaly-Kildare border.

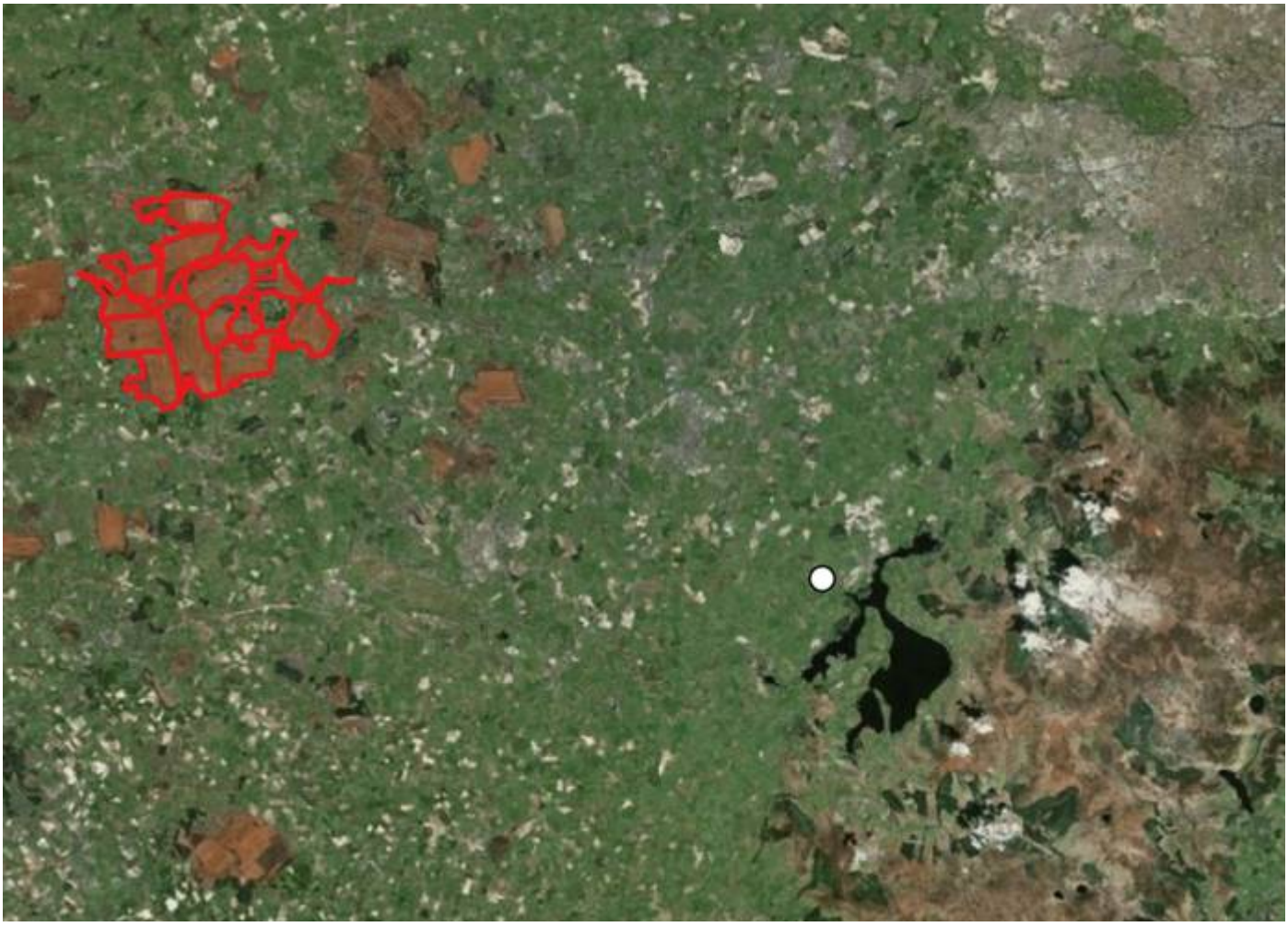
Hi Peter,

Thanks for getting back to me.

The link you sent is further to the east, it doesn't pass through the site. See below. Will the future links you are referring to be in the area of the site or in the area of your existing links?
If in the area of the site, what is your recommended set back distance?

Thanks,

Karen.



Karen Mulryan
Environmental Scientist

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From: Peter O`Brien <peter.obrien@enet.ie>
Sent: 14 July 2020 12:23
To: Karen Mulryan <kmulryan@mkoireland.ie>
Cc: William Morgan <william.morgan@enet.ie>
Subject: RE: 191136 Ballydermot proposed Wind Farm on the Offaly-Kildare border.

Hi Karen,

We only have link in this area currently:

A-End Coordiantes	A-End Antenna Height	B-End Coordiantes	B-End Antenna Height	Frequency
53°10'40.98"N 6°19'53.64"W	15m	53°16'14.66"N 6°56'59.81"W	12m	7GHz

We will be potentially building more links in this area this year so please let me know once you have coordinates for the turbines so that I can check again,

Best Regards,
Peter

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday, July 14, 2020 10:15 AM
To: Peter O`Brien <peter.obrien@enet.ie>
Subject: 191136 Ballydermot proposed Wind Farm on the Offaly-Kildare border.

Good morning Peter,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, on the Offaly-Kildare border. Comreg have recommended we contact you regarding potential telecom links in the area.
Please see site details attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could inform us of any links you may have through the site and the required buffers for them from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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Shaun Doolin

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Follow Up Flag: Follow up
Flag Status: Flagged

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Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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Shaun Doolin

From: Myles Redmond <myles.redmond2@esb.ie>
Sent: Friday 20 November 2020 17:02
To: Karen Mulryan
Cc: Wilson Dalikeni
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border
Attachments: ESB Networks Telecoms - Windfarm Impact Analysis - Ballydermot WF 2020.docx; ATT00001.txt; ATT00002.htm

Follow Up Flag: Follow up
Due By: Monday 23 November 2020 10:00
Flag Status: Flagged

Hi Karen,

Please find the attached report for the Ballydermot Windfarm. If you have any questions, please let me know.

Once the turbine locations have been proposed, please let us know so we can carry out a more detailed analysis.

Regards,

Myles

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Monday 16 November 2020 11:25
To: Redmond. Myles (ESB Networks) <myles.redmond2@esb.ie>
Cc: Dalikeni. Wilson (ESB Networks) <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

Hi Myles,

Thanks for getting back to me. We look forward to your report.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Myles Redmond <myles.redmond2@esb.ie>
Sent: Monday 16 November 2020 11:19
To: Karen Mulryan <kmulryan@mkoireland.ie>
Cc: Wilson Dalikeni <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

Hi Karen,

Yes I was looking at this on Friday last week. There are several links affected however I have not completed a report for you yet, I will send this to you over the coming days once I have completed the analysis.

Regards,

Myles

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Monday 16 November 2020 11:17
To: Redmond. Myles (ESB Networks) <myles.redmond2@esb.ie>
Cc: Dalikeni. Wilson (ESB Networks) <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border
Importance: High

Hi Myles,

Did you get a chance to look at this site yet?

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Myles Redmond <myles.redmond2@esb.ie>
Sent: Thursday 5 November 2020 11:25
To: Karen Mulryan <kmulryan@mkoireland.ie>
Cc: Wilson Dalikeni <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

Hi Karen,

Thanks for your quick response. I will carry out the impact analysis and send a reply by the end of next week.

Regards,

Myles

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Thursday 5 November 2020 11:12
To: Redmond. Myles (ESB Networks) <myles.redmond2@esb.ie>
Cc: dermot.hopkins@esbtelecoms.ie; Dalikeni. Wilson (ESB Networks) <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

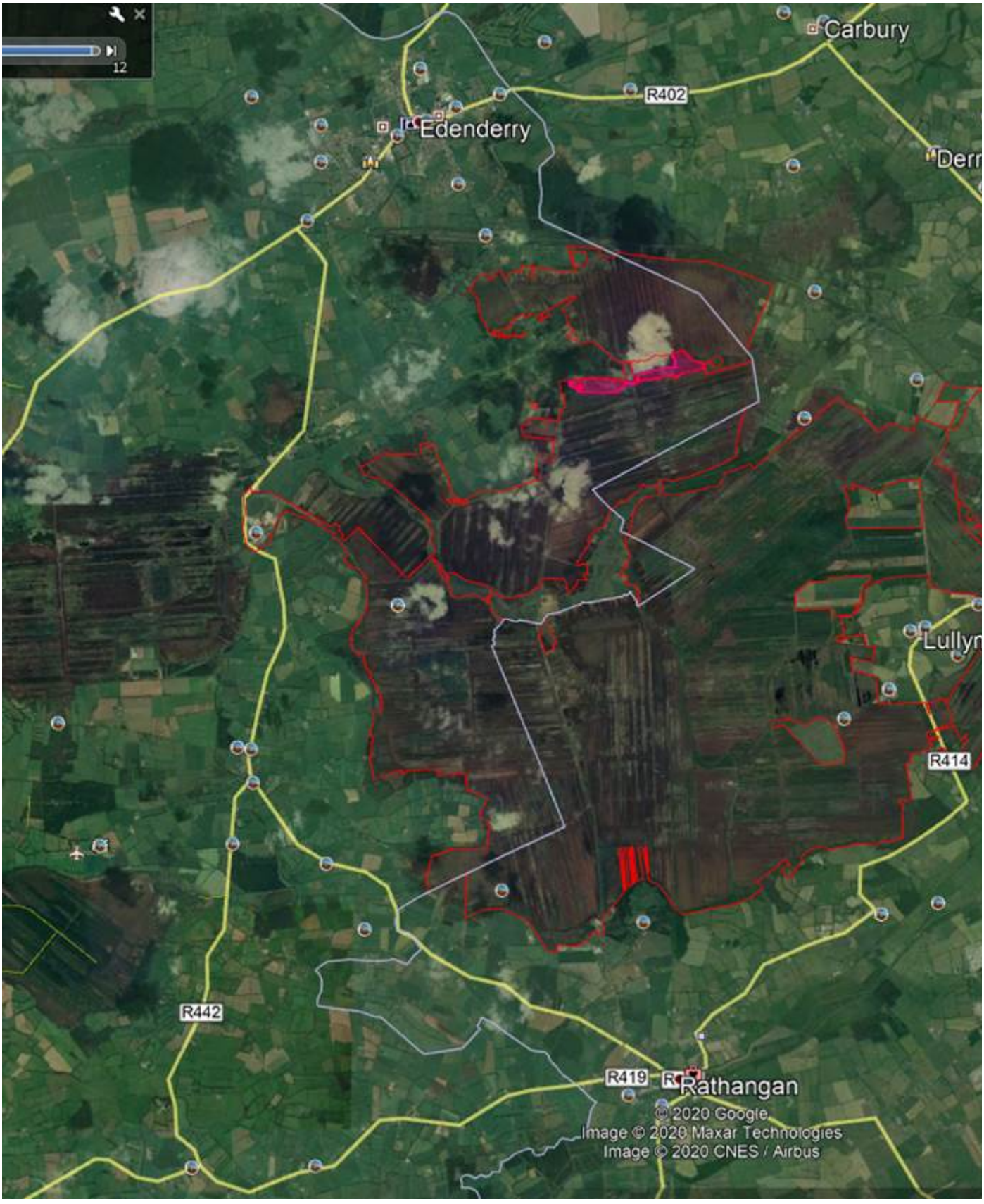
CAUTION: This email is from an external sender. If you are unsure about any links or attachments, please forward it to ESB Cybersecurity Operations at spammonitor@esb.ie

Hi Myles,

Please see attached and below.

Kind regards,

Karen.



Karen Mulryan
Environmental Scientist

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From: Myles Redmond <myles.redmond2@esb.ie>
Sent: Thursday 5 November 2020 11:04
To: Karen Mulryan <kmulryan@mkoireland.ie>
Cc: dermot.hopkins@esbtelecoms.ie; Wilson Dalikeni <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

Hi Karen,

Thanks for forwarding this information, I can't open this type of file, could you please forward on a PDF with a map outline of the site if possible?

Regards,

Myles

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Thursday 5 November 2020 10:34
To: Redmond. Myles (ESB Networks) <myles.redmond2@esb.ie>
Cc: dermot.hopkins@esbtelecoms.ie; Dalikeni. Wilson (ESB Networks) <wilson.dalikeni@esb.ie>
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

CAUTION: This email is from an external sender. If you are unsure about any links or attachments, please forward it to ESB Cybersecurity Operations at spammonitor@esb.ie

Good morning,

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Comreg recommended we contact you regarding potential links in the area.
Please see details attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454

We would be grateful if you could inform us of any telecoms links that may run through the site and your required buffers of such links for the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Karen Mulryan
Sent: Thursday 5 November 2020 10:21
To: dermot.hopkins@esbtelecoms.ie; Wilson.Dalikeni@esb.ie
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border
Importance: High

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Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Karen Mulryan
Sent: Friday 30 October 2020 10:49
To: dermot.hopkins@esbtelecoms.ie; Wilson.Dalikeni@esb.ie
Subject: RE: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border
Importance: High

Good morning,

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Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Karen Mulryan <kmulryan@mccarthykos.onmicrosoft.com>
Sent: Tuesday 15 September 2020 16:37
To: dermot.hopkins@esbtelecoms.ie; Wilson.Dalikeni@esb.ie
Subject: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

Good afternoon,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
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Environmental Scientist

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From: Karen Mulryan
Sent: Tuesday 11 August 2020 16:37
To: 'dermot.hopkins@esbtelecoms.ie' <dermot.hopkins@esbtelecoms.ie>; 'Wilson.Dalikeni@esb.ie' <Wilson.Dalikeni@esb.ie>
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From: Karen Mulryan
Sent: 14 July 2020 10:11
To: dermot.hopkins@esbtelecoms.ie
Subject: 191136 Proposed Ballydermot Wind Farm at Offaly-Kildare Border

Good morning Dermot,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
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WINDFARM IMPACT ANALYSIS REPORT

NETWORKS TELECOMS – BALLYDERMOT WINDFARM IMPACT ANALYSIS

WAN Team

Network Telecoms

Clanwilliam House

Clanwilliam Place

Dublin 2

Project Reference	WINDFARM IMPACT ANALYSIS REPORT
Document Title	NETWORKS TELECOMS – BALLYDERMOT WINDFARM IMPACT ANALYSIS
Prepared By	Myles Redmond

Approved By	
Title	
Date	Click here to enter a date.

Version Control

Date	Rev Num	Author	Summary of Change
20/11/20	Rev 0.1	Myles Redmond	Initial Document

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1 Preliminaries

1.1 Purpose of Document

ESB Networks Telecoms has been asked to carry out a Windfarm Impact Analysis by MKO Ireland on a proposed windfarm development in Ballydermot Co. Offaly. This impact analysis was carried out using the ICS Telecoms Radio planning tool to check the impact that may be caused by the Windfarm on the existing Point to Point and Point to Multipoint Radio network. These radio networks carry critical Operational SCADA traffic for ESB Group and its customers.

2 Impact Analysis

2.1 Proposed Ballydermot Windfarm Boundary



Figure 1 – Outlined Ballydermot WF Boundary

2.2 ESB Networks Radio Networks in Operation in the Area

The lines marked in red are the current and planned radio links in this area that are of concern. These are a mixture of Point to Point and Point to Multipoint radio links which carry critical Operational SCADA traffic for ESB Networks.

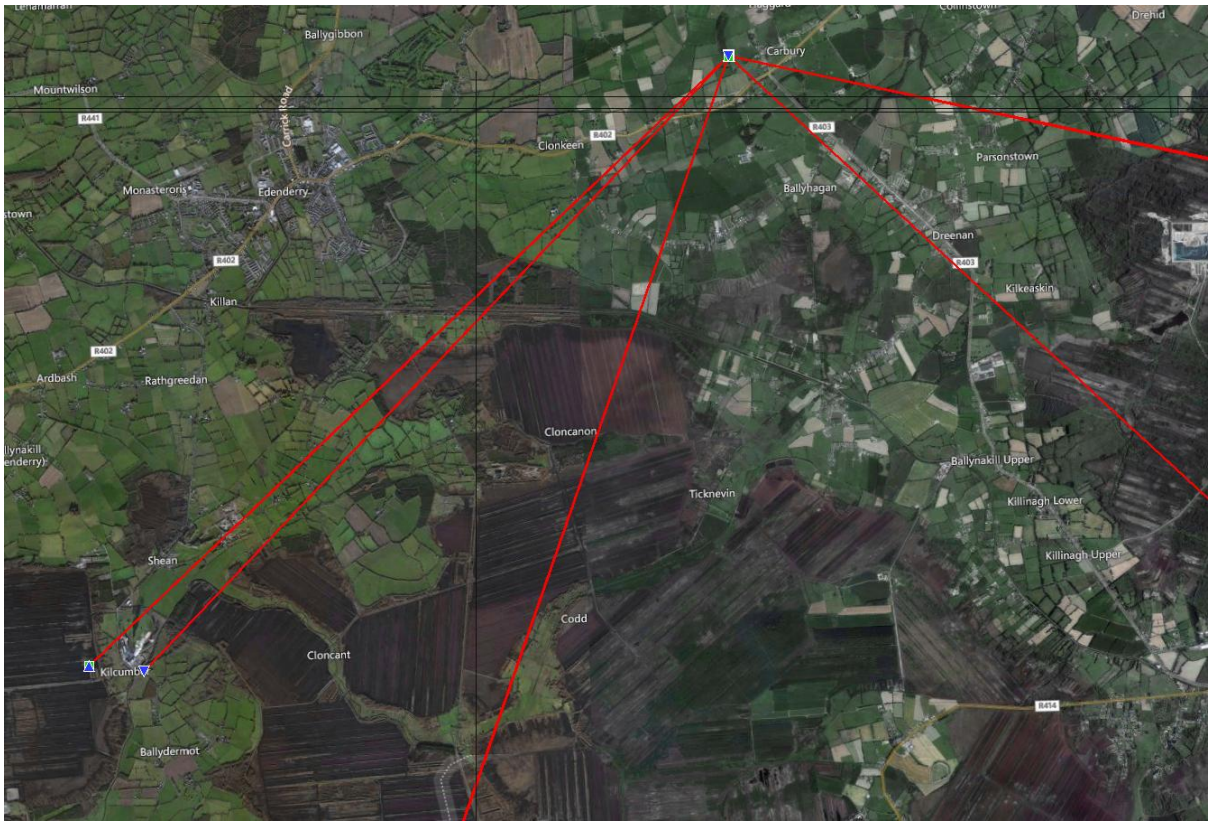


Figure 2 -ESB Microwave links



Figure 3 - Microwave links with 2nd Fresnel Zone

2.3 Detail Radio link Information

2.3.1 Point to Point Radio links

There are 3 radio links that are crossing or near the site boundary, 2 of which are likely to be impacted by the turbines, the third, Carbury Hillsite to Turlough Hill is just for information but isn't expect to be impacted.

Link 1: Carbury to Kilcumber 110kV

Site A: Carbury Hillsite / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 11465MHz

Site B: Kilcumber 110kV / 36m AGL / 72m ASL/ 53.289091 -7.092573 / TX 10975MHz

Link 2: Carbury to Ballyoskill

Site A: Carbury Hill site / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 7526MHz

Site B: Ballyoskill Hillsite 110kV / 36m AGL / 72m ASL/ 52.835216 -7.295671 / TX 7624MHz

Link 3: Carbury to Turlough Hill

Site A: Carbury Hill site / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 7470MHz

Site B: Kilcumber 110kV / 36m AGL / 72m ASL/ 53.029880 -6.411684 / TX 7624MHz

2.3.2 Point to Multipoint Radio links

There is 1 point to multipoint radio link that will be impacted by the planned development:

Link 1: Carbury to Cushaling 110kV

Site A: Carbury Hillsite / 10m AGL / 117m ASL / 53.355842 -6.970762 / TX 458MHz

Site B: Kilcumber 110kV / 8m AGL / 67m ASL/ 53.289372, -7.084755/ TX 458MHz

2.4 Recommended Buffer Clearance Zones

As per the Calculation of the Clearance Zone 3.1.doc by JRC, the buffer clearance zone recommended is the 2nd Fresnel zone clearance plus 150m, a buffer zone to allow for location accuracy of the link ends, turbine construction and ellipsoid conversion anomalies, plus 100m for Turbine micro siting.

The 2nd Fresnel Zone Clearance zone varies with the Frequency but also the link length and the distance of the turbine from Site A and to Site B. For the calculations below, I assumed the link length was 10km, with the turbine at 5km from site A and 5km to site B.

For the Point to Multipoint Polling radio link which operate at ~458MHz, This would be 57 (57.2286m) + 150 + 100 = approx. 307m outside the blade tips on both sides of the links.

For the 7GHz link to Ballyoskill , the 2nd Fresnel zone is approx. 11.19m (11m) so the total would be 261m outside the blade tips on both sides of the links.

For the 11GHz link to Kilcumber 110kV, the 2nd Fresnel zone is approx. 21m (20.77m) so the total would be 271m outside the blade tips on both sides of the links.

3 Conclusions

Please email ESB Network Telecoms if there is further information required. Once the turbine locations have been identified, can you please contact myles.redmond2@esb.ie and Wilson.dalikeni@esb.ie with the following:

- The turbine locations in Decimal degrees or Irish National Grid Reference
- The turbine dimensions including height of rotor, the blade length and the maximum tip height
- The guaranteed maximum micro siting of the turbine.

Shaun Doolin

From: Lorna Brennan <lorna.brennan@imaginegroup.ie>
Sent: Tuesday 14 July 2020 14:12
To: Karen Mulryan; Philip Chandler; Martin Dolan
Cc: Ronnie O'Neill
Subject: RE: 191136 Proposed Wind Farm at Ballydermot, Offaly-Kildare Border.

Hi Karen,

Based on the map provided the proposed Wind Farm will not impact the existing Imagine network.

Kind Regards,
Lorna

From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: 14 July 2020 10:26
To: Philip Chandler; Lorna Brennan; Martin Dolan
Cc: Ronnie O'Neill
Subject: RE: 191136 Proposed Wind Farm at Ballydermot, Offaly-Kildare Border.

Good morning,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Ronnie O'Neill <Ronnie.ONeill@imaginegroup.ie>
Sent: 14 July 2020 10:17
To: Karen Mulryan <kmulryan@mkoireland.ie>
Subject: Automatic reply: 191136 Proposed Wind Farm at Ballydermot, Offaly-Kildare Border.

Hi there , I am on leave until Monday 22nd June .

If the matter is urgent , please contact the following people -

Operations - philip.chandler@imaginegroup.ie

Transmission - lorna.brennan@imaginegroup.ie

Buiild - martin.dolan@imaginegroup.ie

Rgds,

Ronnie .

Shaun Doolin

From: Karen Mulryan
Sent: Monday 2 November 2020 16:46
To: Thomas Sheridan
Subject: 191136 Ballydermot Proposed Wind Farm

Hi Thomas,

That's grand, we will incorporate 100m along the links and when we get the interim and then final design we will be in touch again to ensure no issues and to see if any of the links have since been decommissioned.
We are in the very early stages of the project so the information you have provided is very helpful for us going forward.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Thomas Sheridan <thomas.sheridan@eir.ie>
Sent: Monday 2 November 2020 16:40
To: Karen Mulryan <kmulryan@mkoireland.ie>
Subject: Re: 191136 Ballydermot Proposed Wind Farm

Karen,

There is no single answer to this. A 100m separation between the radio path's and the turbine blade tips would be ideal. We have worked with developers to allow less clearance provided that the radio end points are precision gps surveyed and we can eliminate the possibility of the wind turbines being moved any closer under micrositing tolerances.

One of the above links is outside the site.

One or both of the other two may well be decommissioned as the sites are being connected via fibre. I cannot give a definite commitment on this at present as some network link diversity has still to be planned.

Regards,

Tom

On Mon, Nov 2, 2020 at 4:08 PM Karen Mulryan <kmulryan@mkoireland.ie> wrote:

> Hi Thomas,
>
> Sorry I thought I sent you a red line boundary. Do you have a required set back distance from these links?
>
> Kind regards,
>
> Karen.

Karen Mulryan
Environmental Scientist

MKO

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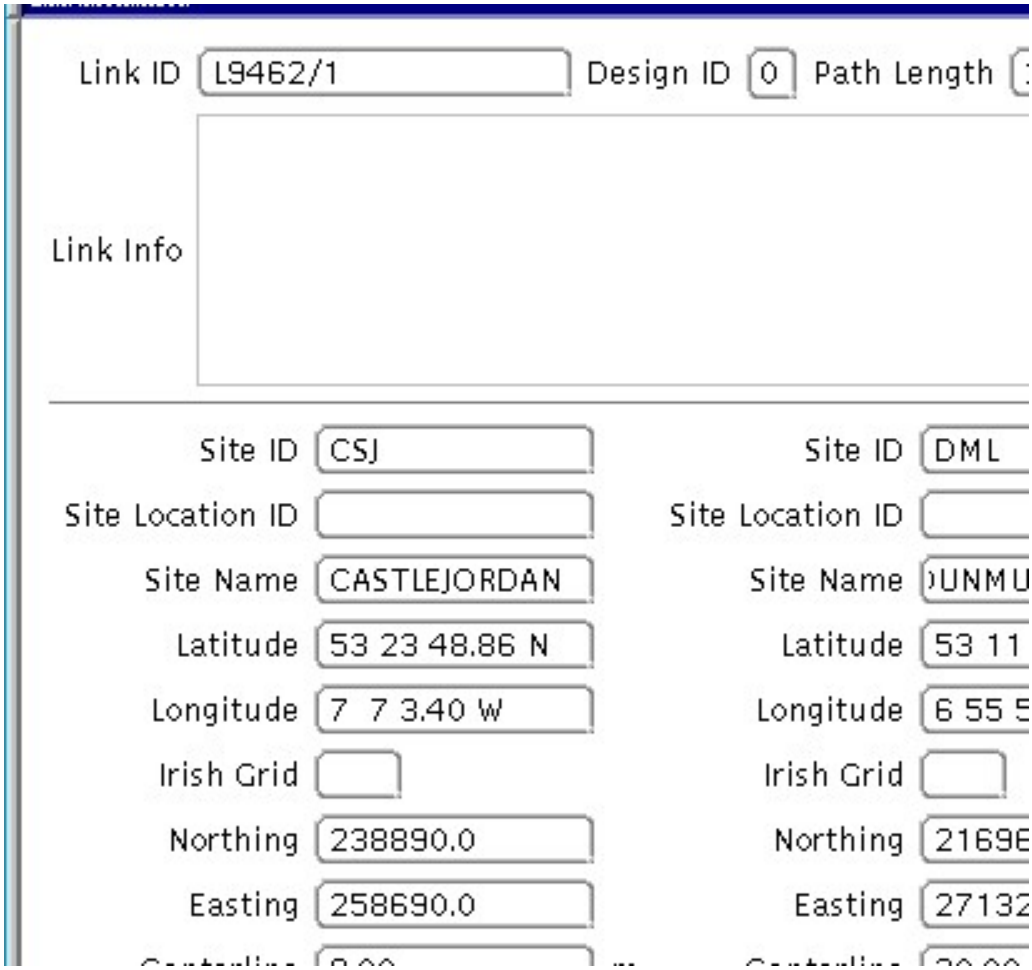
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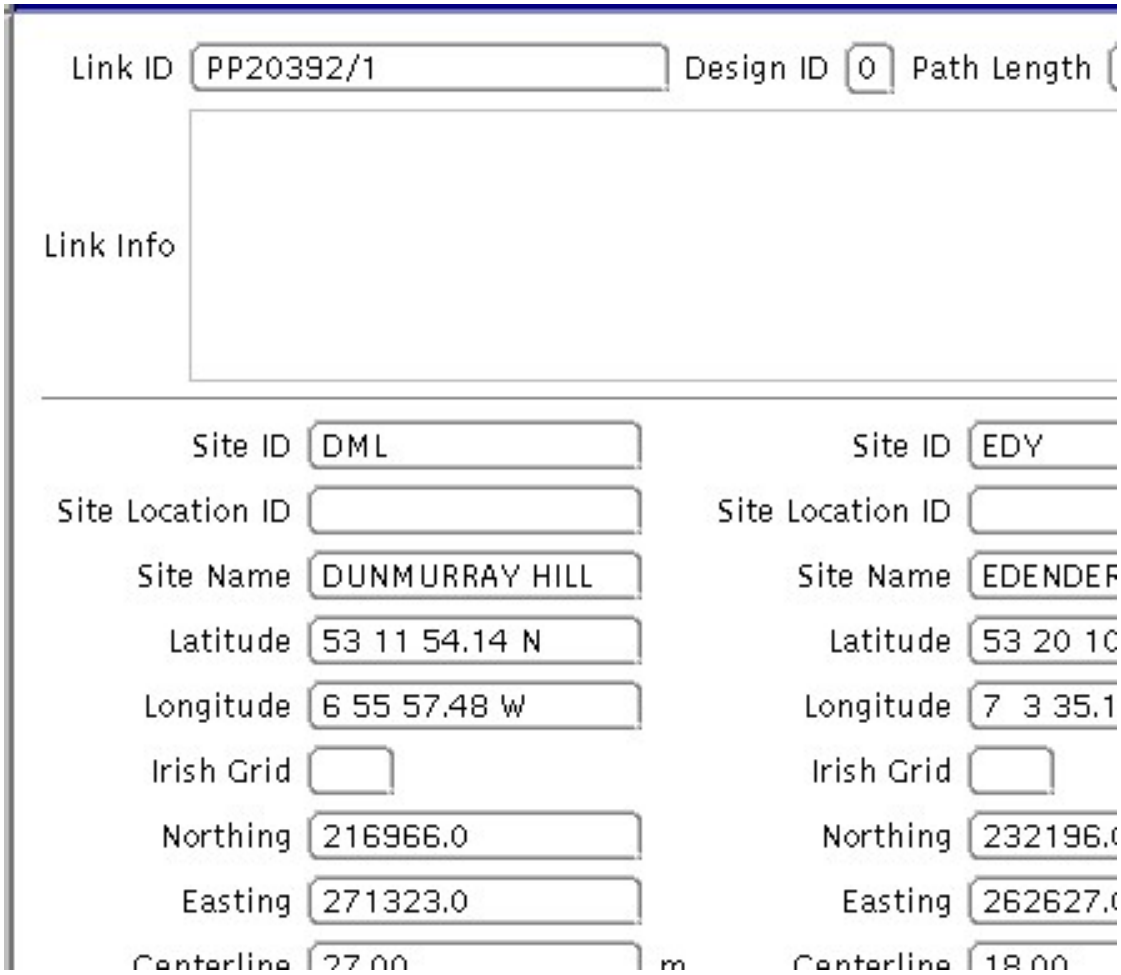
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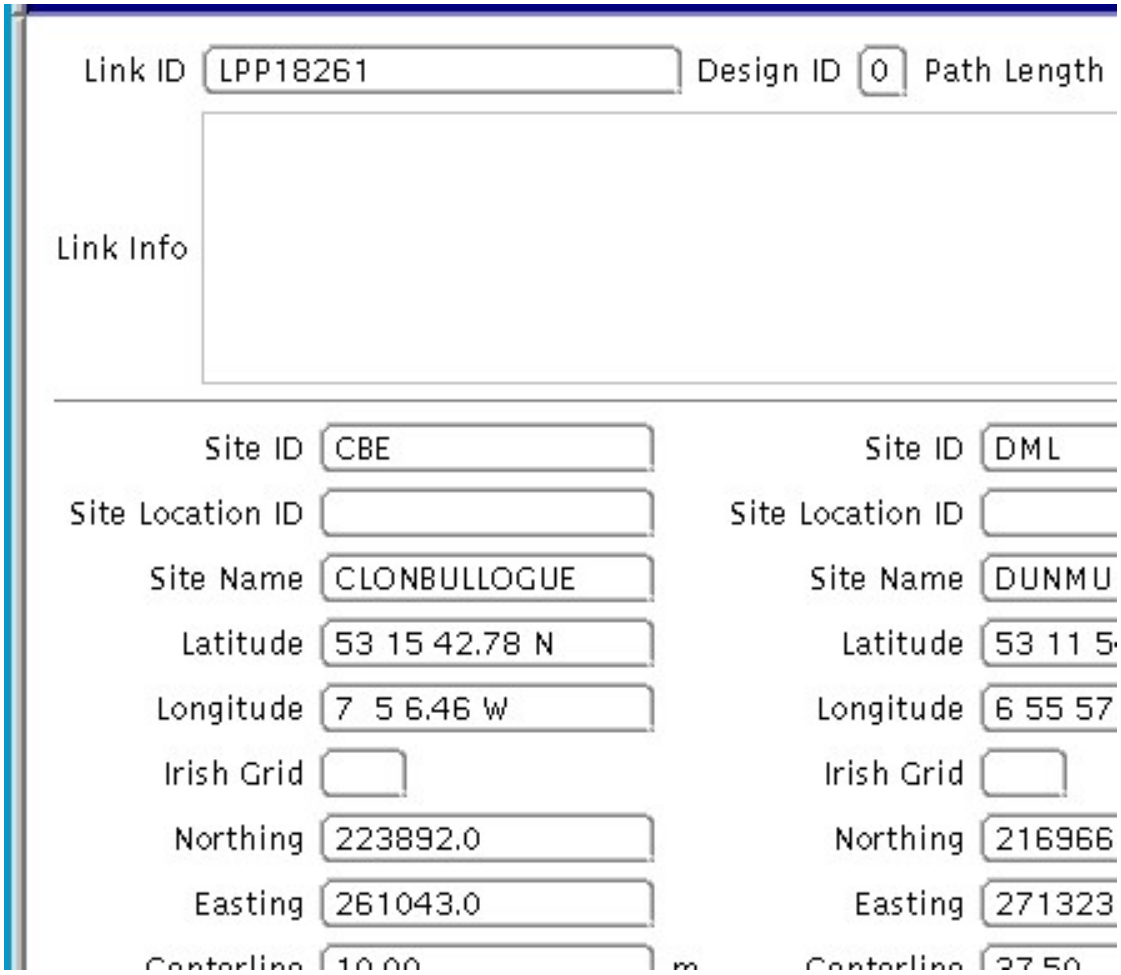
From: Thomas Sheridan <thomas.sheridan@eir.ie>
Sent: Monday 2 November 2020 15:33
To: Karen Mulryan <kmulryan@mkoireland.ie>
Subject: Re: 191136 Ballydermot Proposed Wind Farm

Karen,

The links below are in or close to the turbine locations in the Ballydermot.kmz file. (There is no red line boundary).




Link ID
PP20392/1
Design ID
0
Path Length
Link Info
Site ID
DML
Site Location ID
Site Name
DUNMURRAY HILL
Latitude
53 11 54.14 N
Longitude
6 55 57.48 W
Irish Grid
Northing
216966.0
Easting
271323.0
Centerline
27.00
m
Site ID
EDY
Site Location ID
Site Name
EDENDER
Latitude
53 20 10
Longitude
7 3 35.1
Irish Grid
Northing
232196.
Easting
262627.
Centerline
18.00



On Mon, Nov 2, 2020 at 3:01 PM Karen Mulryan <kmulryan@mkoireland.ie> wrote:

> Hi Thomas,
>
> We don't have them as of yet, the client is trying to design an interim layout using links in the area as a guide along with other eco constraints.
>
> Do you know of any going through the red line boundary that we can buffer out?
>
> Kind regards,
>
> Karen.

Karen Mulryan
Environmental Scientist

MKO

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From: Thomas Sheridan <thomas.sheridan@eir.ie>
Sent: Monday 2 November 2020 14:57
To: Karen Mulryan <kmulryan@mkoireland.ie>
Subject: Re: 191136 Ballydermot Proposed Wind Farm

Hi Karen,

I had a quick look but I need a more detailed check. Could you please send me the turbine locations in Irish Grid format.

Regards,

Tom

On Mon, Nov 2, 2020 at 1:10 PM Karen Mulryan <kmulryan@mkoireland.ie> wrote:

Hi Thomas,

Did you get the files alright?

Have you had a chance o look at this yet?

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Karen Mulryan
Sent: Friday 30 October 2020 12:30
To: Thomas Sheridan <thomas.sheridan@eir.ie>
Subject: 191136 Ballydermot Proposed Wind Farm

Hi Thomas,

Please see attached.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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From: Thomas Sheridan <thomas.sheridan@eir.ie>
Sent: Friday 30 October 2020 11:29
To: Karen Mulryan <kmulryan@mkoireland.ie>
Subject: Re: 191136 Ballydermot Proposed Wind Farm

Hi Karen,

Could you please send me the site location(s) in Irish Grid format. A map in kmz format would also be useful.

Seamus has left eircom about 2 years ago - it is difficult to keep up with all the changes and departures in personnel in all the telecom companies.

Best Regards,

Thomas Sheridan

On Fri, Oct 30, 2020 at 10:42 AM Karen Mulryan <kmulryan@mkoireland.ie> wrote:

> Hi Thomas,
>
> Would you be able to help me regarding potential openeir links through the attached site?
>
> John Bagnall sent me an eir link (Link 1 – End point 1 - 53°17'41.80"N 7° 4'55.84"W, End point 2 – 53°21'21.15"N 6°58'14.85"W with a 100m buffer).
>
> Do you know if there are any openeir links in the area also?
>
> Comreg asked us to contact Seamus O Keeffe at Openeir for details but I don't think he works there anymore.
>
> Kind regards,
>
> Karen.

Karen Mulryan
Environmental Scientist

MKO

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Thomas Sheridan
Core Networks Radio Engineer

T: +353 851742191
E: **Thomas.Sheridan@eir.ie**
eir Monivea Road, Mervue, Galway

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Thomas Sheridan
Core Networks Radio Engineer



T: +353 851742191
E: **Thomas.Sheridan@eir.ie**
eir Monivea Road, Mervue, Galway

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Thomas Sheridan
Core Networks Radio Engineer

T: +353 851742191
E: **Thomas.Sheridan@eir.ie**
eir Monivea Road, Mervue, Galway

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Thomas Sheridan
Core Networks Radio Engineer

T: +353 851742191
E: Thomas.Sheridan@eir.ie
eir Monivea Road, Mervue, Galway

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Shaun Doolin

From: Andrew Snowdon <andrew.snowdon@ripplecom.net>
Sent: Friday 31 July 2020 11:09
To: Karen Mulryan; Fergus Hickey; Licensing
Cc: Network-Engineering
Subject: Re: 191136 Ballydermot Proposed Wind Farm, Offaly-Kildare Border

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen,

We require 20 meter's plus what ever the radius of the turbine blades are.

Best regards,

Andrew

On 30/07/2020 09:53, Karen Mulryan wrote:

> Good morning Fergus,
> What size buffer zone would you require for the below link?
> Kind regards,
> Karen.

Karen Mulryan
Environmental Scientist
MKO
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Ireland, H91 VW84
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> **From:** Fergus Hickey <fergus.hickey@ripplecom.net>
> **Sent:** 15 July 2020 10:56
> **To:** Karen Mulryan <kmulryan@mkoireland.ie>; Licensing <licensing@ripplecom.net>
> **Cc:** Network-Engineering <network-engineering@ripplecom.net>
> **Subject:** Re: 191136 Ballydermot Proposed Wind Farm, Offaly-Kildare Border
> Hi Karen
> This will affect one of our links from Grangecommon to Rossderra Meats in Edenderry
> GPS Grange 53.206688 -6.913814. at a height of 2 metres above ground level.
> Rossderra Meats GPS 53.349769 -7.049729 at a height of 10 metres above ground level.
> This is a 17GHz PTP link
> Please let me know if you require and further information
>
> **Thank you**
>
> **Best Regards**

Fergus Hickey I Operations Coordinator

M: 087 2340041
E: fergus.hickey@ripplecom.net I **W:** ripplecom.net
Houston Hall, Raheen Business Park, Limerick, V94 PKF1



Please consider the environment before printing this email.

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: 14 July 2020 10:21
To: Licensing <licensing@ripplecom.net>
Cc: Network-Engineering <network-engineering@ripplecom.net>
Subject: 191136 Ballydermot Proposed Wind Farm, Offaly-Kildare Border

Good morning,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area. Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist
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Shaun Doolin

From: Alister Cole <Alister.Cole1@three.ie>
Sent: Thursday 16 July 2020 13:57
To: Karen Mulryan
Cc: Alan Hutchinson; DL Estates ROI
Subject: RE: 191136 Ballydermot Proposed Wind Farm, Offaly- Kildare Border
Attachments: Potentially affected links - Ballydermot WF.xlsx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen,

Please find attached details of MW links traversing the proposed windfarm area. We would require 100m buffer.

Best regards,

Alister

Alister Cole
Transmission Engineer

Mobile: 086 6024556
Email: Alister.Cole1@three.ie

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: 14 July 2020 10:23
To: Alister Cole <Alister.Cole1@three.ie>
Cc: Alan Hutchinson <alan.hutchinson@three.ie>; DL Estates ROI <Estates@three.ie>
Subject: 191136 Ballydermot Proposed Wind Farm, Offaly- Kildare Border

Good morning Alister,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan

Environmental Scientist
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Shaun Doolin

From: Marcin Skupski <Marcin.Skupski@viatel.com>
Sent: Thursday 16 July 2020 18:56
To: Karen Mulryan; Conor Pendlebury
Cc: newbuild
Subject: RE: 191136 Proposed Wind Farm at Ballydermot on the Offaly-Kildare border

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karen,

I can confirm that Viatel has no microwave links crossing the highlighted area.

Kind regards,

Marcin Skupski
Build and Maintenance Team Leader

T: 086 832 0724
M: marcin.skupski@viatel.com

www.viatel.com

Viatel

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& Security Services easy to use

From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 14 July 2020 10:28
To: Conor Pendlebury <Conor.Pendlebury@viatel.com>
Cc: newbuild <newbuild@viatel.com>
Subject: 191136 Proposed Wind Farm at Ballydermot on the Offaly-Kildare border

Good morning,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan

Environmental Scientist
MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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Shaun Doolin

From: Mark Nolan <Mark.Nolan@virginmedia.ie>
Sent: Thursday 6 August 2020 10:22
To: Karen Mulryan
Cc: Cathal O Donnell
Subject: RE: 191136 Ballydermot Proposed Wind Farm on the Offaly-Kildare border

Apologies Karen,

I haven't had my coffee yet…we **do not** have radio links running through this area!

Rgds

Mark

From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: 06 August 2020 10:09
To: Mark Nolan <Mark.Nolan@virginmedia.ie>
Cc: Cathal O Donnell <Cathal.ODonnell@virginmedia.ie>
Subject: RE: 191136 Ballydermot Proposed Wind Farm on the Offaly-Kildare border

Hi Mark,

Would you be able to provide coordinates for your links and a required buffer zone for the links, if any?

Thanks,

Karen.

Karen Mulryan
Environmental Scientist
MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
www.mkoireland.ie

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From: Mark Nolan <Mark.Nolan@virginmedia.ie>
Sent: 06 August 2020 10:01
To: Karen Mulryan <kmulryan@mkoireland.ie>
Cc: Cathal O Donnell <Cathal.ODonnell@virginmedia.ie>
Subject: RE: 191136 Ballydermot Proposed Wind Farm on the Offaly-Kildare border

Hi Karen,

As it stands we have radio links running through the purposed area.

Rgds

Mark

Mark Nolan | B2B Wireless Networks Manager
Virgin Media | Limerick, Roxboro Rd, Limerick
D: + 353 1 245 8480 | M: + 353 862315007
Mark.Nolan@virginmedia.ie | www.virginmedia.ie

From: Karen Mulryan [mailto:kmulryan@mkoireland.ie]
Sent: 14 July 2020 10:30
To: Mark Nolan <Mark.Nolan@virginmedia.ie>
Cc: Cathal O Donnell <Cathal.ODonnell@virginmedia.ie>
Subject: 191136 Ballydermot Proposed Wind Farm on the Offaly-Kildare border

Good morning Mark,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist
MKO
Tuam Road, Galway
Ireland, H91 VW84
+353 (0) 91 735611
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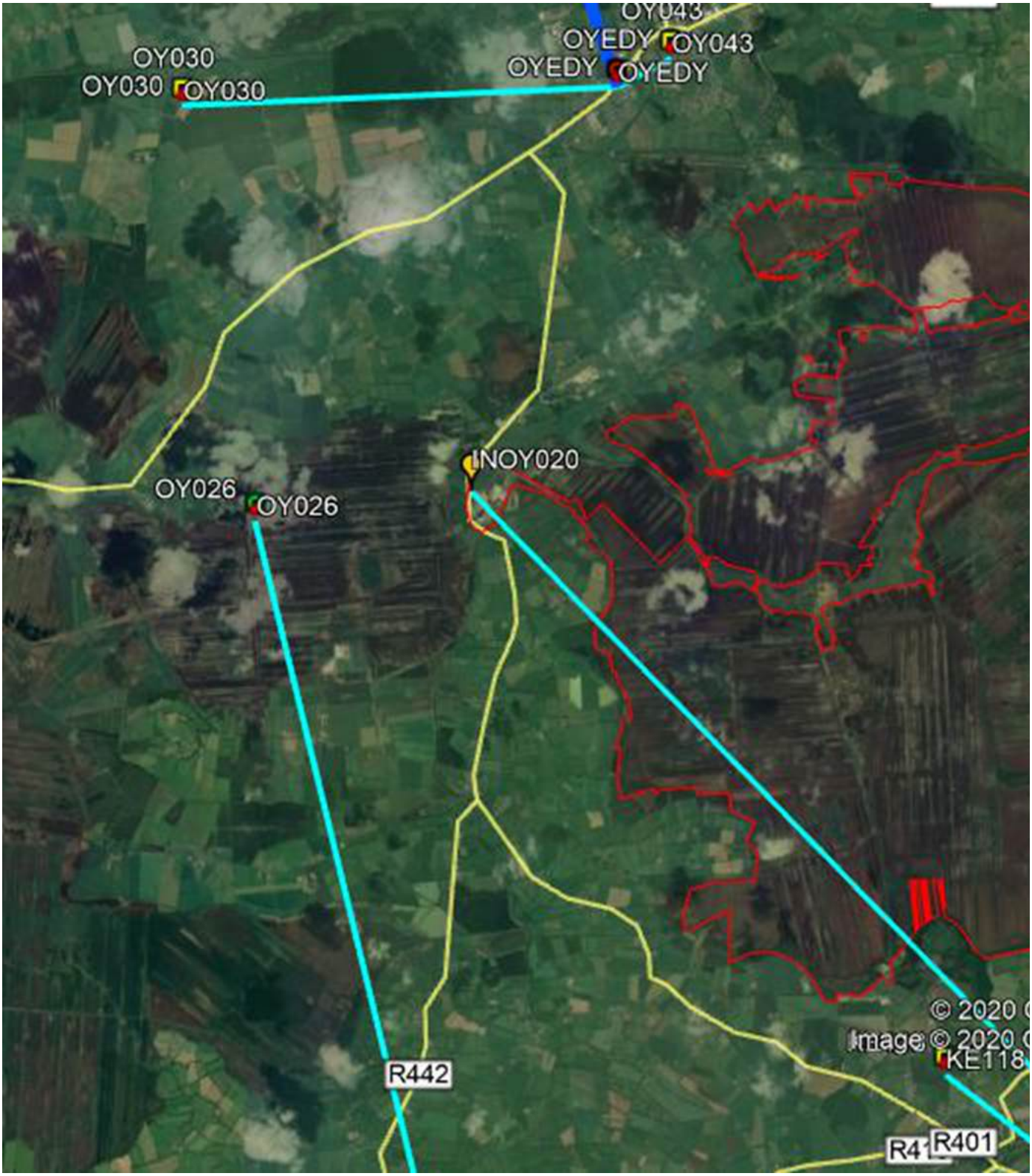
Tara Ivanovic

From: Byrne, Gavin, Vodafone Ireland <gavin.byrne@vodafone.com>
Sent: Tuesday 14 July 2020 10:45
To: Karen Mulryan
Cc: McHugh, Brian, Vodafone Ireland; Dennehy, Darragh, Vodafone Ireland; Murphy, Daragh, Vodafone Ireland; Cassidy, Emma, Vodafone Ireland; Neill o', Shane, Vodafone Ireland
Subject: RE: 191136 Ballydermot Proposed Wind Farm, Offaly-Kildare Border

HI Karen,

Please see below links in the area. Doesn't look like there will too much of an issue, but please ensure that a minimum exclusion zone of +30m from the 1st Fresnel zone is maintained. Any questions, give me a shout.

LinkID	Radio Config Status	BW + Ref Mod	Freq Band	Lower Modulation	Upper Modulation	Max Ethernet Capacity (Mbps)	B-End IDU	B-End HW IDU Type	B-End Latitude	B-End Longitude	A-End IDU	A-End HW IDU Type	A-End Latitude	A-End Longitude	RAN Site Aggregation	Access RAN Site Dependents	Hop Distance (km)
KEDMHINOY020_S0	radio 1+0	bw14MHz-4QAM	15 GHz	4QAM	256QAM	85	INOY020700	ALCplus2e	53.292704	-7.087162	KEDMH720	ALCplus2e	53.19850647	-6.933594904	Corporate		14.63
KE013KE012_S0	radio XPIC single pipe	bw56MHz-16QAM	18 GHz	4QAM	256QAM	682	KE012700	ALCplus2e	53.304394354	-6.934903498	KE013702	ALCplus2e	53.257518988	-6.826922537	1	KE012	8.87



Gavin Byrne
TX Planning & Design Engineer
Converged Transmission
+353876448159
gavin.byrne@vodafone.com

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vodafone.ie

The future is exciting.
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From: Karen Mulryan <kmulryan@mkoireland.ie>
Sent: Tuesday 14 July 2020 10:31
To: Byrne, Gavin, Vodafone Ireland <gavin.byrne@vodafone.com>
Subject: 191136 Ballydermot Proposed Wind Farm, Offaly-Kildare Border

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

Good morning Gavin,

We are undertaking a feasibility study for a proposed wind farm at Ballydermot, which is on the Offaly-Kildare border. Comreg recommended we contact you regarding potential links in the area.
Please see the attached. The approximate centre coordinates of the site are: Eastings 266304 Northing 225429 or ITM 666249, 725454.

We would be grateful if you could provide information regarding your links that may run through the site and your required buffers from the rotor blade tip.

Kind regards,

Karen.

Karen Mulryan
Environmental Scientist

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TELECOMS SCOPING ROUND 2 -2025 RESPONSES

Ballydermot WF – Telecom Operator Consultations

1. 2RN Response to Consultations

From: Matthew Craig <matthew.craig@2rn.ie>
Sent: Tuesday 6 May 2025 12:05
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; windfarms@rte.ie; Johnny Evans <johnny.evans@2rn.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David and Kevin,

Our network has not changed in the area that you have highlighted.
We are only concerned about the impact to broadcast services from Kippure and would ask that a protocol be signed should the site go ahead. Something that I believe has already been done.

Regards

Matthew Craig

Project Engineer
Projects and Coverage Planning
2RN
Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland
D24 WK28
Mobile: + 353 (0) 87 7509955

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:45
To: Matthew Craig <matthew.craig@2rn.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; windfarms@rte.ie; Johnny Evans <johnny.evans@2rn.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Hello Matthew,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.
If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

_____

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.

Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

2. Airwave Response to Consultations

From: John Barry <john@airwave.ie>
Sent: Tuesday 6 May 2025 13:41
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Info @ Airwave <info@airwave.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

No infrastructure here

John Barry
Airwave Internet
e: john@airwave.ie
p: 021-2024000
m: 087-9471657

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:50
To: John Barry <john@airwave.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Info @ Airwave <info@airwave.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hello John,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.
If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

_____
Kevin Hayes
For and on behalf of **Ai Bridges Limited**

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UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

3. CIE Response to Consultations

From: Peter Cunningham <Peter.Cunningham@cie.ie>
Sent: Friday 2 May 2025 09:53
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: FW: Ballydermot Wind Farm Development, Co Offaly

The proposed site lies within the GSM-R (Mobile Network for Railways) coordination zone. Please see below:

From a study carried out by the ANFR (Agence Nationale des Frequences in France), the output calls for 2 main recommendations by defining 2 main zones as follows:

1- **Exclusion zone**: wind farm not less than 5 Km from antenna
2- **Coordination zone**: : 5Km<wind farm <30Km: this area, coordination between operators is required to fix any issue and impact on the signal propagation

Peter Cunningham,
Chartered Surveyor

M: +353 (0)87 2112320,
Curzon House, 35 Lower Abbey St., Dublin 1, D01 H560
www.cie.ie

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At Córas Iompair Éireann we believe in facilitating flexible working, so while it suits me to email now, I do not expect a response or action outside of your own working hours.

4. Coimisiún na Meán Response to Consultations

From: Roger Woods <rwoods@cnam.ie>
Sent: Friday 2 May 2025 09:04
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David

Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed sub station is not located close to any existing or planned FM transmission sites.

Regards

Roger
Innealtóir Feidhmiúcháin Sinsearach | Senior Executive Engineer

T: +353 (0)1 644 1200 | rwoods@cnam.ie

Coimisiún na Meán

1 Áras Shíol Bhroinn, Bóthar Shíol Bhroinn, Baile Átha Cliath, D04 NP20, Éire.
1 Shelbourne Buildings, Shelbourne Road, Dublin, D04 NP20, Ireland.

Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda agus is leis an duine sin amháin a bhfuil siad seolta chuige/chuici a bhaineann siad. Muna duitse an ríomhphost seo, ní ceart é a léamh ná a scaoileadh chuig aon tríú páirtí. Iarrtar ort teachtaireacht a sheoladh chuig an seoltóir nó chuig info@cnam.ie, agus an ríomhphost seo a scrios.

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Déan machnamh ar an timpeallacht, le do thoil, roimh an ríomhphost seo a phriontáil.

Please consider the environment before printing this email.

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Thursday 1 May 2025 16:53
To: Roger Woods <rwoods@cnam.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Reception CnaM <reception@cnam.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hello Roger,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.
We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

_____

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

5. Department of Defence Response to Consultations

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Monday 19 May 2025 15:48
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Without Prejudice
Dear Mr. McGrath,
I refer to your e-mail below, dated 02 May 2025, in relation to the proposed windfarm development at Ballydermot, Co. Offaly.
I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observations are made on a non-prejudicial basis, and are not intended to be used to rely on for a prospective planning application, nor are these observations to be relied on in the event of any commercial transaction pertaining to such lands and they are not to be relied on in the event of any contract exchange pertaining to same.
As a matter of practice, the Department of Defence does not provide observations or advice in the scoping process, except where the relevant parties have been directed by a planning authority to seek the Department's views.
Having consulted with the Military authorities, the Department of Defence wishes to make the following observations:

- All turbines should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or, if LED or if other types are used, of a type visible to Night Vision equipment. Obstacle lighting used must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.
- In the event negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigations as soon as practical.

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.
We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the pre-planning stage.
Please contact me if you have any queries in this regard.

Kind regards,

Bernie

Bernie Tierney

Proprty Management Branch

An Roinn Cosanta
Department of Defence
Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.
Station Road, Newbridge, Co.Kildare, W12 AD93.

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Friday 2 May 2025 12:09
To: David McGrath <dmcgrath@aibridges.ie>; Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Dear Mr. McGrath,

The Department of Defence wishes to acknowledge receipt of your below email in relation to Ballydermot Wind Farm.

We will consult with our military colleagues and will revert in due course.

Please note that Don Watchorn and Sarah Zacharia no longer work in our Planning Unit.

Kind Regards

Phil
Philomena Evans
Estate Management
Property Management Branch
___
An Roinn Cosanta
Department of Defence
Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.
Station Road, Newbridge, Co.Kildare, W12 AD93.
___
E-mail propertymanagementplanning@defence.ie

6. Eir Response to Consultations

From: Bagnall, John <john.bagnall@eir.ie>
Sent: Friday 2 May 2025 12:50
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: Re: Ballydermot Wind Farm Development, Co Offaly

Hi David,

No change still the 5 links traversing the area.

Eir fixed network

nk	Description	Link Type	Co-ordinates		Antenna Heights		Link Distance	Freq used in Calculations for Fresnel Zone
			Site A	Site B	Site A	Site B		
1	Dunmurry Hill - Castlejordan	PTP	53 11 55.12 N 06 56 00.84 W	53 23 49.63 N 07 07 06.54 W	37.5m	7m	25.3 km	11 GHz
2	Dunmurry Hill - Edenderry Garda Stn	PTP	53 11 55.12 N 06 56 00.84 W	53 20 11.42 N 07 03 38.24 W	37.5m	24m	17.5 km	11 GHz
3	Dunmurry Hill - Clonbullouge	PTP	53 11 55.12 N 06 56 00.84 W	53 15 43.41 N 07 05 09.36 W	37.5m	10m	12.4 km	11 GHz

Eir mobile network

Link	Description	Link Type	Co-ordinates		Antenna Heights		Link Distance	Freq used in Calculations for Fresnel Zone
			Site A	Site B	Site A	Site B		
1	Edenderry P.S. - Carbury	PTP	53 17 41.82 N 07 04 56.17 W	53 21 21.15 N 06 58 14.85 W	**26.5m**	**12m**	10.0 km	13 GHz
2	Edenderry P.S. - Togher	PTP	53 17 41.82 N 07 04 56.17 W	53 20 11.03 N 07 15 26.92 W	**26m**	**23m**	12.55 km	**11 GHz**

Kind regards,

John Bagnall
Wireless Transmission Engineer

M: +353 85 1053746
E: john.bagnall@eir.ie
Address: EirCode - D08 Y42N

From: David McGrath
Sent: Thursday 1 May 2025 17:10
To: John Bagnall <John.Bagnall@eir.ie>; MobileNetworksTXN@eir.ie
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hello John,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.
We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

_____

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

7. Enet Response to Consultations

From: Peter O` Brien <peter.obrien@enet.ie>
Sent: Friday 2 May 2025 09:16
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; John Byrne <John.Byrne@enet.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi,

We have one link passing through this area:

Link Name	A-End Coordinates	A-End Antenna Height	B-End Coordinates	B-End Antenna Height	Frequency	Buffer
RTE Kippure - SCP0087 - Lullymore Heritage Park	53.178050 -6.331566	20m	53.270739 -6.949947	12m	7GHz	50m

Regards,

Peter O` Brien | Licensed Link planner
A: Enet House, National Technology Park, Castletroy, Co Limerick, V946P52
M: +353867744313 | **W:** www.enet.ie

Registered in Ireland, Registration No. 332982
Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52
enet is a registered business name of e-nasc éireann teoranta

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Thursday, May 1, 2025 4:53 PM
To: Peter O` Brien <peter.obrien@enet.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; John Byrne <john.byrne@enet.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Hello Peter,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.
We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

_____

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

8. ESB Networks Response to Consultations

From: wfanalysis (ESB Networks) <wfanalysis@esb.ie>
Sent: Thursday 28 August 2025 12:23
To: David McGrath <dmcgrath@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Good morning,

Please find attached a basic exclusion zone created for the development at Ballydermot Wind Farm. To avoid interference to our links, the development must fall outside of this zone.

Please note that this exclusion zone represents a conservative zone because we have no turbine parameters, and this could be reduced on provision of hub height and blade size and either turbine location or development boundary.

Any proposed wind turbines within the defined exclusion zone will require further detailed coordination to avoid interference and degradation of critical ESB-operated radio links.
We kindly request that you re-consult with ESB once the turbine locations and dimensions are available.

Kind regards,
Abud

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Thursday 1 May 2025 17:10
To: wfanalysis (ESB Networks) <wfanalysis@esb.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Walsh. Jonathan (ESB Networks) <jonathan.walsh@esb.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

CAUTION: This message is from an EXTERNAL SENDER - be CAUTIOUS, Do NOT Click any links or Open any attachments if you were not expecting them.

Dear Sir / Madam,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.
We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

_____

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.

Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

From: Myles Redmond <myles.redmond2@esb.ie>
Sent: Tuesday 5 January 2021 09:10
To: David McGrath <dmcgrath@aibridges.ie>; Kevin Hayes <khayes@aibridges.ie>
Cc: Wilson Dalikeni <wilson.dalikeni@esb.ie>; Paul McDonagh <paul.mcdonagh@esb.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David, Kevin,

Happy new year to you both.

Please find attached detailed report of the impact to the ESB's Operational Radio Networks. There are several point to point radio links passing through the proposed site including a trunk radio link, an access radio link and also 1 point to multipoint radio link.

Once the turbine locations have been determined, please let us know as soon as possible so we can carry out a detailed analysis of the potential impact.

Regards,

Myles

2.3.1 Point to Point Radio links

There are 3 radio links that are crossing or near the site boundary, 2 of which are likely to be impacted by the turbines, the third, Carbury Hillsite to Turlough Hill is just for information but isn't expected to be impacted.

Link 1: Carbury to Kilcumber 110kV

Site A: Carbury Hillsite / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 11465MHz

Site B: Kilcumber 110kV / 36m AGL / 72m ASL/ 53.289091 -7.092573 / TX 10975MHz

Link 2: Carbury to Ballyoskill

Site A: Carbury Hill site / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 7526MHz

Site B: Ballyoskill Hillsite 110kV / 36m AGL / 72m ASL/ 52.835216 -7.295671 / TX 7624MHz

Link 3: Carbury to Turlough Hill

Site A: Carbury Hill site / 8m AGL / 117m ASL / 53.355842 -6.970762 / TX 7470MHz

Site B: Kilcumber 110kV / 36m AGL / 72m ASL/ 53.029880 -6.411684 / TX 7624MHz

2.3.2 Point to Multipoint Radio links

There is 1 point to multipoint radio link that will be impacted by the planned development:

Link 1: Carbury to Cushaling 110kV

Site A: Carbury Hillsite / 10m AGL / 117m ASL / 53.355842 -6.970762 / TX 458MHz

Site B: Cushaling 110kV / 8m AGL / 67m ASL/ 53.289372, -7.084755/ TX 458MHz

9. Imagine Broadband Response to Consultations

From: Paul Brunel <Paul.Brunel@imaginegroup.ie>
Sent: Friday 2 May 2025 10:57
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Ronnie O'Neill <Ronnie.ONeill@imaginegroup.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,
Imagine are in the process of decommissioning all our microwave links. This process should be complete within 12 months.
We do not need to be informed of any new developments going forward.

Kind Regards,
Paul Brunel
Transmission Planner,
Network Deployment.
www.imagine.ie
086 388 1962
Sandyford Business Centre | Blackthorn Road |Sandyford | D18AW89

Disclaimer: www.imagine.ie/email-disclaimer/

10. Tetra Ireland Response to Consultations

From: Tom Barry <tom.barry@motorolasolutions.com>
Sent: Friday 2 May 2025 07:59
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Thomas Barry <Tom.Barry@tetraireland.ie>; Kevin Hayes <khayes@aibridges.ie>; Aidan Damer <Aidan.Damer@tetraireland.ie>
Subject: Re: Ballydermot Wind Farm Development, Co Offaly

David,

There have not been any changes to the network in the area. Can you please ensure that the development is reviewed by eir.

Regards,
Tom

On Thu, May 1, 2025 at 5:13 PM David McGrath <dmcgrath@aibridges.ie> wrote:

Hello Tom,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.
We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

_____
Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

11. Three Ireland Response to Consultations

From: David Montgomery <David.Montgomery@three.ie>
Sent: Tuesday 6 May 2025 12:16
To: David McGrath <dmcgrath@aibridges.ie>; DL Estates ROI <Estates@three.ie>; Monika Biniaszewska <Monika.Biniaszewska@three.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Sean Kelly <Sean.Kelly2@three.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

A few changes in this area since 2021. Latest transmission link details below.
Can you leave a 20m buffer from the blade tips please?

Link no.	Link Ref	Freq.	Site A	X	Y	Lat	Lon	Dish Height	Site B	X	Y	Lat	Lon	Dish Height
1	ML016076	18GHz	OF0003	261743	232851	53.3425	-7.07379	30m	KD0157	274628	227022	53.2885	-6.88175	29m
2	ML020859	26GHz	OF0003	261743	232851	53.3425	-7.07379	30m	OF0108	261317	224051	53.2635	-7.08189	26m
3	ML020331	26GHz	OF0108	261317	224051	53.2635	-7.08189	26m	KD0213	266770	220331	53.2294	-7.00096	29m
4	ML020522	18GHz	OF0003	261743	232851	53.3425	-7.07379	30m	OF0105	261243	227548	53.2949	-7.08232	30m

Regards,

Dave

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:51
To: DL Estates ROI <Estates@three.ie>; Monika Biniaszewska <Monika.Biniaszewska@three.ie>; David Montgomery <David.Montgomery@three.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Sean Kelly <Sean.Kelly2@three.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

CAUTION! External Email.

Hello Monika, David,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.
If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

_____

Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.

Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

12. Uisce Éireann Response to Consultations

From: Peter Thornton <pethornt@water.ie>
Sent: Wednesday 7 May 2025 10:50
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

I can confirm that there are no UÉ communication links traversing the proposed wind farm.
Regards,
Peter Thornton
Telemetry Services Manager

From: David McGrath <dmcgrath@aibridges.ie>
Sent: Tuesday 6 May 2025 11:51
To: Peter Thornton <pethornt@water.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; John Flaherty <jflaherty@water.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Hello Peter,

We are looking to conclude our Telecommunications Impact Assessment Statement for the proposed wind farm at Ballydermot, Co. Offaly.
If you have any concerns regarding the development, we would be grateful if you could let us know as soon as possible.

Thank you for your assistance with this matter.

Yours sincerely,

_____
Kevin Hayes
For and on behalf of **Ai Bridges Limited**

Ai Bridges Ltd.,
UNIT 9, BLOCK B,
Quin Rd. Business Park,
Ennis, Co. Clare,
Ireland.
Tel : +353 65 6848768
FAX : +353 65 6848769
Web : www.aibridges.ie

13. Viatel Response to Consultations

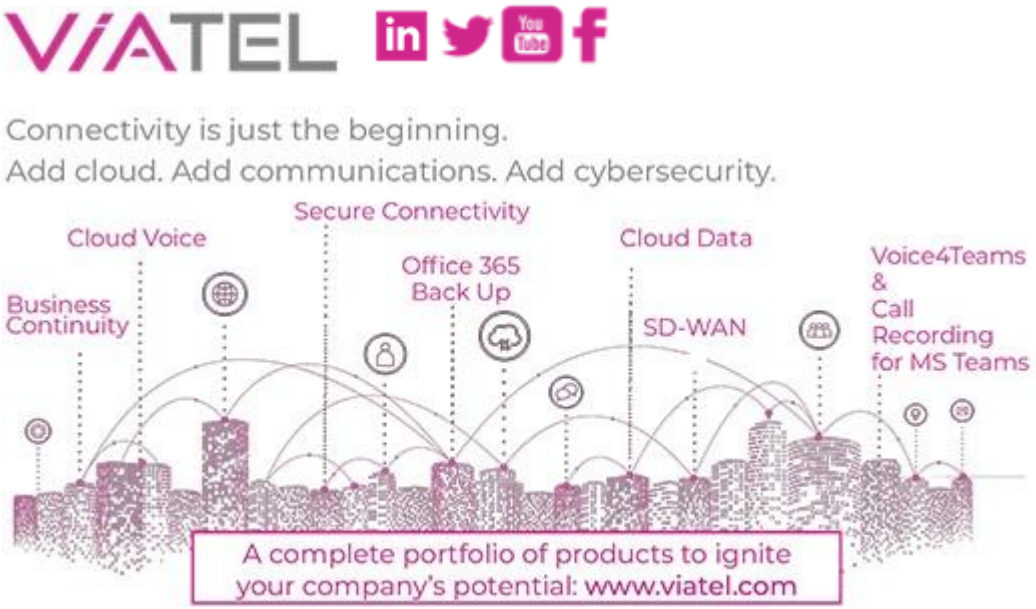
From: Marcin Skupski <Marcin.Skupski@viatel.com>
Sent: Friday 2 May 2025 09:27
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Conor Pendlebury <Conor.Pendlebury@viatel.com>; Viatel Customer Care <care@viatel.com>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi David,

No impact.

Thank you,

Marcin Skupski
Build & Maintenance Team Leader
M: +353 (0) 86 8320724
E: Marcin.Skupski@viatel.com



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14. Virgin Media Response to Consultations

From: 'Mark Nolan' <Mark.Nolan@virginmerdia.ie>
Sent: 23 September 2026
To: Kevin Hayes <khayes@aibridges.ie>
Cc: AIBridges – Engineering <engineering@aibridges.ie>
Subject: Ballydermot Wind Farm Development - Telecoms Impact Assessment

Hi Kevin,

Yes, as discussed, in principle we would be open to review the mitigation measure purposed once all costs that will be incurred including recurring opex costs are taken on by the windfall operators in question.

Rgds
Mark

From: Kevin Hayes <khayes@aibridges.ie>
Sent: 24 September 2026
To: 'Mark Nolan' <Mark.Nolan@virginmerdia.ie>
Cc: AIBridges – Engineering <engineering@aibridges.ie>
Subject: Ballydermot Wind Farm Development - Telecoms Impact Assessment

Hello Mark,

I am just following up from the email below and from our telephone call just now

As discussed can you confirm that in principle that Virgin Media would be in agreement with the Mitigation Measure Strategy that is being proposed by Ai Bridges

We are looking to include a response from VM in our final recommendations for mitigation measures

Thank you for your assistance on this matter

Best Regards,
Kevin Hayes,

From: Kevin Hayes <khayes@aibridges.ie>
Sent: 23 September 2026
To: 'Mark Nolan' <Mark.Nolan@virginmerdia.ie>
Subject: Ballydermot Wind Farm Development - Telecoms Impact Assessment

Hello Mark

Thank you for the prompt response.

Just to confirm that Ai Bridges are proposing that in the event of a planning consent

1. that any wind turbine that potentially causes an impact to a Virgin Media Link would not be constructed until a technically viable mitigation measure solution has been implemented

2. the developer would cover all associated mitigation measure costs

Ai Bridges are recommending a condition of planning based on the above.

This would protect existing operation of the Virgin Media links.

From: 'Mark Nolan' <Mark.Nolan@virginmerdia.ie>
Sent: 23 September 2026
To: Kevin Hayes <khayes@aibridges.ie>
Cc: AIBridges – Engineering <engineering@aibridges.ie>
Subject: Ballydermot Wind Farm Development - Telecoms Impact Assessment

Hi Kevin,

Apologies, I was awaiting contract details and term lenght status.

One of those schools have already been decommissioned with another likely to be confirmed in the coming weeks.

The third I have yet to get feedback on.

I will give you a call after lunch but to redirect any of our links will come at a significant cost as we do not have a presence at Saggart.

Rgds
Mark

From: Kevin Hayes <khayes@aibridges.ie>
Sent: 23 September 2026
To: 'Mark Nolan' <Mark.Nolan@virginmerdia.ie>
Cc: AIBridges – Engineering <engineering@aibridges.ie>
Subject: Ballydermot Wind Farm Development - Telecoms Impact Assessment

Hello Mark,

I am following up from our call last week and our email correspondence below.

Would you be available for a call later today, I have also copied your colleague in RF Planning

We are just following up to confirm if you have any comments in relation to our [proposed mitigation measure strategy proposal that any potential impacts to the VM transmission networks would be resolved in advance of construction and operation of any impacting wind turbine

As discussed last week all mitigation measures would be borne by the developer

We are looking to close out consultations by today if possible for submission tomorrow
Best Regards,
Kevin Hayes,

From: Kevin Hayes <khayes@aibridges.ie>
Sent: 15 September 2026
To: 'Mark Nolan' <Mark.Nolan@virginmerdia.ie>
Cc: AIBridges – Engineering <engineering@aibridges.ie>
Subject: Ballydermot Wind Farm Development - Telecoms Impact Assessment

Hello Mark,

I am following up from our call earlier. As discussed, we are conducting a Telecoms Impact Assessment for the proposed Ballydermot Wind Farm Development

During the consultation process the VM links were identified below and we have modelled the potential impacts of the proposed turbines in relation to same

A number of Mitigation Measures have been proposed, see attached

As discussed, we are proposing that if the planning application is consented that Virgin Media would be consulted and a suitable mitigation measure me agreed and implemented to the agreement of Virgin Media

Also as highlighted a consented development may take 3 – 4 years before entering the construction phase

Would you be available for a call tomorrow to discuss

Link Name / ID	Band MHz\GHz	Link Length	Site A			Site B		
			Lat	Long	Ant Height	Lat	Long	Ant Height
RochfortBridge Convent 20439I to VM Dunmurry	11GHz	34.5km	53° 24.907'N	7° 18.216'W	8mts	53° 11.906'N	6° 56.003'W	8mts
Gaelscoil Eadan Doire 20332N to VM Dunmurry	13GHz	18.2km	53° 20.340'N	7° 4.292'W	8mts	53° 11.906'N	6° 56.003'W	8mts
Oaklands Community College 72540O to VM Dunmurry	15GHz	17.7km	53° 20.229'N	7° 3.763'W	8mts	53° 11.906'N	6° 56.003'W	8mts
Saint Marys Secondary School 65582Q to VM Dunmurry	13GHz	17.8km	53° 20.380'N	7° 3.592'W	8mts	53° 11.906'N	6° 56.003'W	8mts
ST_Etchens_NS_19848S to VM Dunmurry	11GHz	30.9km	53° 27.396'N	7° 6.171'W	8mts	53° 11.906'N	6° 56.003'W	8mts
Cloch_Rinnce_NS_18093J to VM Dunmurry	13GHz	22.9km	53° 23.865'N	7° 0.902'W	8mts	53° 11.906'N	6° 56.003'W	8mts
Johnstown_Est_Hotel to VM Dunmurry	13GHz	23.9km	53° 24.299'N	6° 50.206'W	8mts	53° 11.906'N	6° 56.003'W	8mts
Irish Explosives to VM Dunmurry	13GHz	21.3km	53° 22.497'N	6° 48.608'W	8mts	53° 11.906'N	6° 56.003'W	8mts

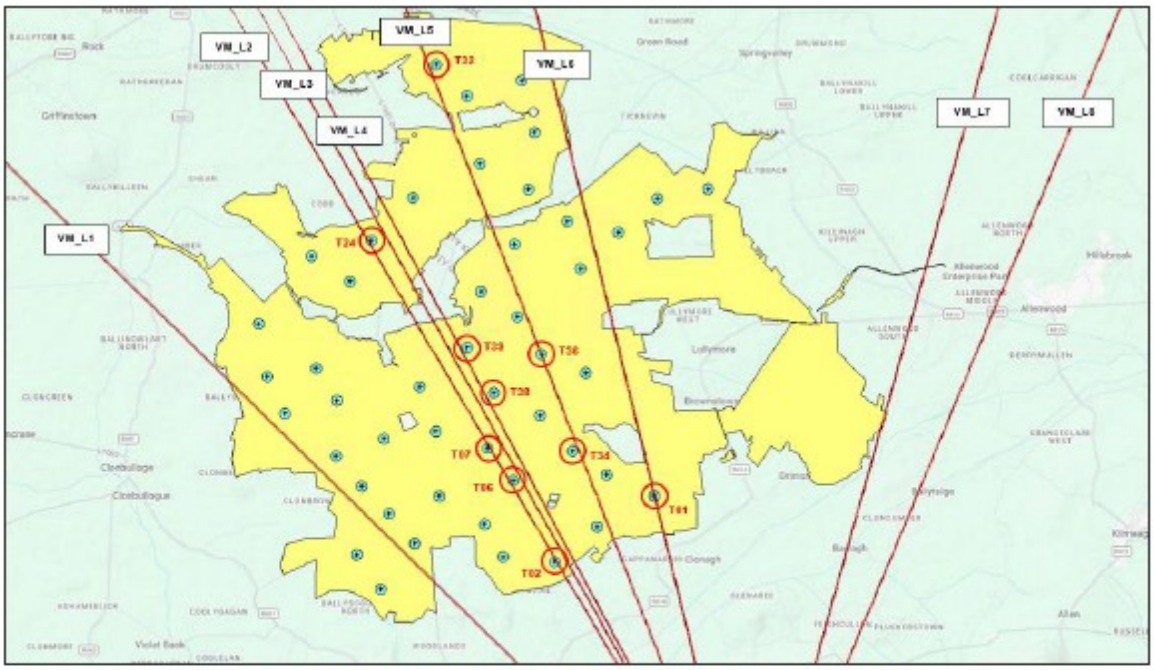


Figure 17. Virgin Media Network – Close-up Plan View

To further assess the potential impact of the proposed turbines, the radio links have been modelled in 3D and the Clearance Distances between the Fresnel Zone(s) of the links and the blade-tip of the turbines have been calculated.

A 3D view of the radio links is shown below in Figure 18. The results of the 3D analysis indicate that the radio path of three Virgin Media radio links would be obstructed by the proposed turbines (VM_L2, VM_L5 and VM_L6).

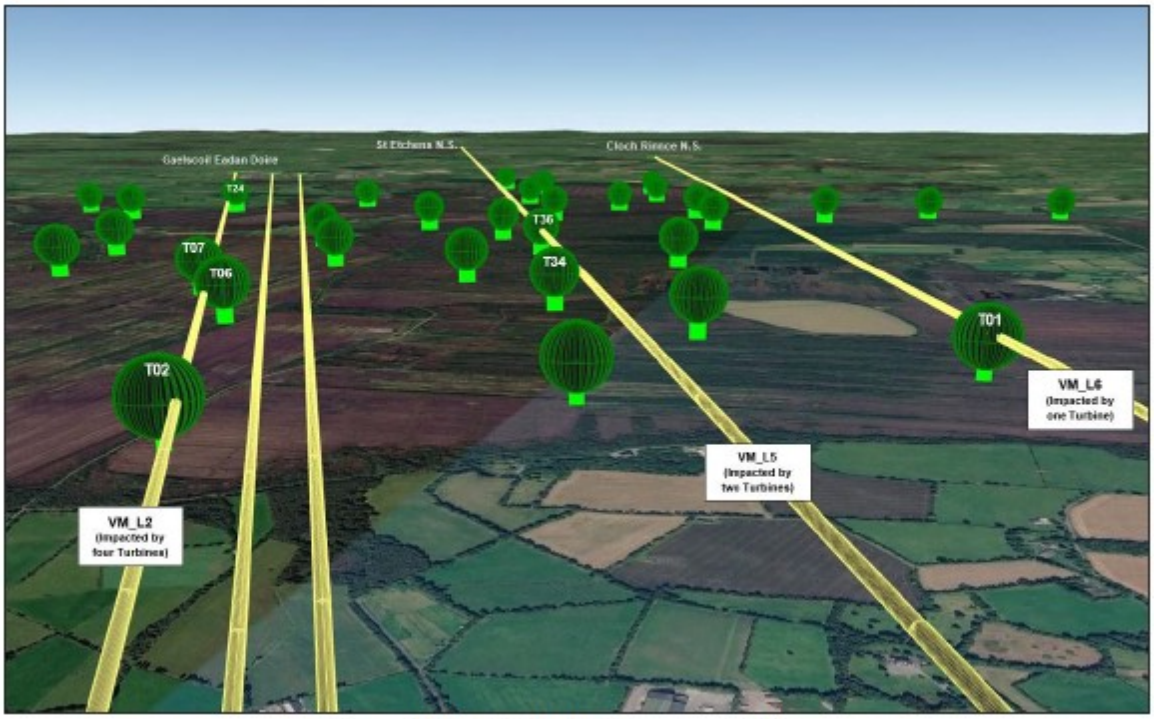


Figure 18. Virgin Media Network – 3D View

Table 13 below provides a brief summary of the network analysis for the Virgin Media network in the vicinity of the proposed wind farm.

Link ID	Link Description	Nearest Turbine(s)	Fresnel Zone (F1) Clearance Distance	Observations
VM_L1	Rochfortbridge Convent to VM Dunmurry	T12	> 50 m	No impacts.
VM_L2	Gaelscoil Eadan Doire to VM Dunmurry	T02	- 60.5 m (Interference Condition)	Link impacted by four turbines (T02, T06, T07 & T24) (Mitigation measures required)
		T06	- 31.8 m (Interference Condition)	
		T07	- 45.3 m (Interference Condition)	
		T24	- 8.6 m (Interference Condition)	
VM_L3	Oaklands Community College to VM Dunmurry	T06	35.6 m	No impacts.
VM_L4	Saint Marys Secondary School to VM Dunmurry	T39	20.2 m	No impacts.
VM_L5	St Etchens NS to VM Dunmurry	T32	22.3 m	Likely to be Impacted by two turbines (T34 & T36) (Mitigation measures required)
		T34	< 5 m (Clearance = 1.8 m)	
		T36	- 81.5 m (Interference Condition)	
		T40	47.0 m	
VM_L6	Cloch Rinnce NS to VM Dunmurry	T01	- 82.2 m (Interference Condition)	Link impacted by one turbine (T01) (Mitigation measures required)
VM_L7	Johnstown Est Hotel to VM Dunmurry	T01	> 50 m	No impacts.
VM_L8	Irish Explosives to VM Dunmurry	T01	> 50 m	No impacts.

Table 13. Analysis Summary – Virgin Media Network

From: Keiran Butler <Keiran.Butler@virginmedia.ie>
Sent: Tuesday 13 May 2025 12:58
To: David McGrath <dmcgrath@aibridges.ie>; Mark Nolan <Mark.Nolan@virginmedia.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

Hi All

Please see attached
This is a very busy site with Virgin Media as we have a lot of radio links here

Regards
Keiran Butler

Link Name / ID	Band MHz\GHz	Link Length	Site A					Site B				
			Lat	Long	Easting	Northing	Ant Height	Lat	Long	Easting	Northing	Ant Height
RochfortBridge Convent 20439I to VM Dunmurry	11GHz	34.5km	53° 24.907'N	7° 18.216'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Gaelscoil Eadan Doire 20332N to VM Dunmurry	13GHz	18.2km	53° 20.340'N	7° 4.292'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Oaklands Community College 72540O to VM Dunmurry	15GHz	17.7km	53° 20.229'N	7° 3.763'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Saint Marys Secondary School 65582Q to VM Dunmurry	13GHz	17.8km	53° 20.380'N	7° 3.592'W			8mts	53° 11.906'N	6° 56.003'W			8mts
ST_Etchens_NS_19848S to VM Dunmurry	11GHz	30.9km	53° 27.396'N	7° 6.171'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Cloch_Rinnce_NS_18093J to VM Dunmurry	13GHz	22.9km	53° 23.865'N	7° 0.902'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Johnstown_Est_Hotel to VM Dunmurry	13GHz	23.9km	53° 24.299'N	6° 50.206'W			8mts	53° 11.906'N	6° 56.003'W			8mts
Irish Explosives to VM Dunmurry	13GHz	21.3km	53° 22.497'N	6° 48.608'W			8mts	53° 11.906'N	6° 56.003'W			8mts

15. Vodafone Response to Consultations

From: Robert Power, Vodafone (External) <robert.power1@vodafone.com>
Sent: Friday 2 May 2025 10:04
To: David McGrath <dmcgrath@aibridges.ie>
Cc: Kevin Hayes <khayes@aibridges.ie>; Chris Stephenson, Vodafone (External) <chris.stephenson2@vodafone.com>; Gavin Byrne, Vodafone <gavin.byrne@vodafone.com>; Sean Lyons, Vodafone (External) <sean.lyons@vodafone.com>; Siobhan Burke, Vodafone <siobhan.burke1@vodafone.com>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

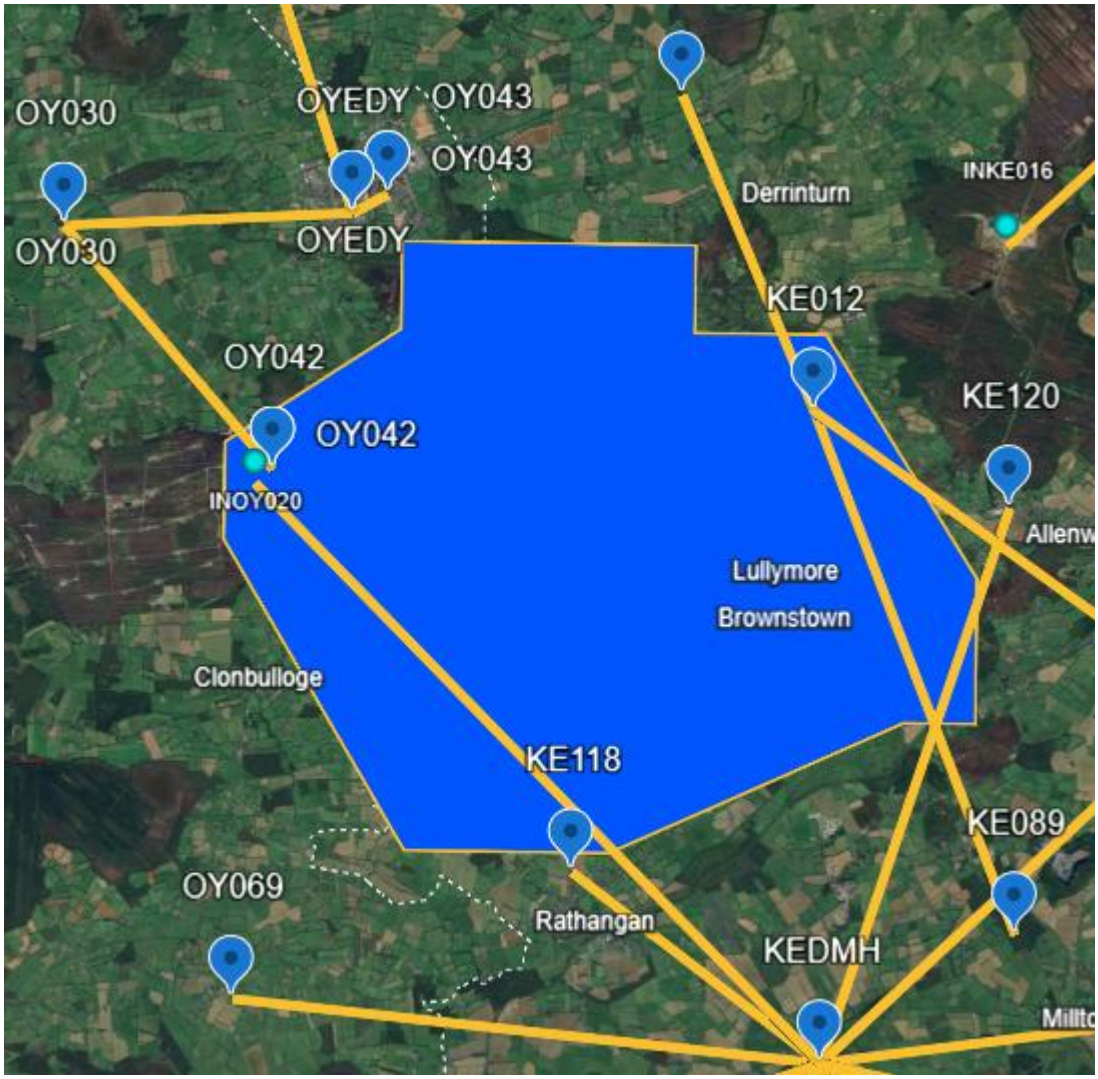
Hi Kevin,

All links highlighted previously are still active but I there are two more that I don't think were included last time. See table below.

Let me know if you require any additional information.

Kind Regards,
Robert

Link Name / ID	Band GHz	Link Length Km	Site A			Site B		
			Northing (Irish Grid)	Easting (Irish Grid)	Ant Height m	Northing (Irish Grid)	Easting (Irish Grid)	Ant Height m
KE012-KE013	18	8.894	228736	271054	15	223632	278338	15
KEDMH-OY020	15	14.604	216953	271317	30	227267.52	260978.39	30
KE120-KEDMH	18	10.603	227025	274631	25	216953	271317	35
KE089-KE012	18	10.169	219294	274833	24	228736	271054	20
KE012-KE114	26	6.2	228736	271054	22	234421	268578	7
OY030-OY042	26	5.839	231903	257364	31	227541	261246	52.87



From: David McGrath <dmcgrath@aibridges.ie>
Sent: Thursday 1 May 2025 17:16
To: Robert Power, Vodafone (External) <robert.power1@vodafone.com>
Cc: Kevin Hayes <khayes@aibridges.ie>; Chris Stephenson, Vodafone (External) <chris.stephenson2@vodafone.com>; Gavin Byrne, Vodafone <gavin.byrne@vodafone.com>; Sean Lyons, Vodafone (External) <sean.lyons@vodafone.com>; Siobhan Burke, Vodafone <siobhan.burke1@vodafone.com>
Subject: RE: Ballydermot Wind Farm Development, Co Offaly

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Dear Sir / Madam,

The developer of Ballydermot Wind Farm has requested us to update the Telecommunications Impact Assessment Statement which was initially prepared for the proposed development in 2021.
The location of the proposed development is to the south of Edenderry, Co Offaly and is shown below in the Site Location Map.

We would appreciate it if you could let us know if there has been any change to your network in the Ballydermot area of Co. Offaly since we first contacted you in 2021.

We would also appreciate it if you could provide your response to the above, by close of business on May 08th 2025. If no response is received by this date, we will assume that there has been no change to your network since our first correspondence in 2021.

Yours sincerely,

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Kevin Hayes
For and on behalf of **Ai Bridges Limited**

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