

## Celine Hughes

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**From:** Environmental Co-ordination (Inbox) <Environmental\_Co-ordination@agriculture.gov.ie>  
**Sent:** Wednesday 10 June 2020 16:12  
**To:** Owen Cahill  
**Subject:** RE: 191223-a - Scoping Document - Cleanrath Renewable Energy Development

Dear Mr Cahill,

The following are the comments from the Department of Agriculture, Food & the Marine 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 Licence 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/forests-service/tree-felling/tree-felling/>

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/tree-felling/FellingReforestationPolicy240517.pdf>. As this development is within a 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 for 2020 are published online at:

<https://www.agriculture.gov.ie/forests-service/publicconsultation/environmentalimpactassessment-ia-publicconsultation-for-afforestation-forest-road-construction-and-felling-licenses-2020/>

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/forests-service/publicconsultation/environmentalimpactassessment-2020-register-of-decisions/>

It is important to note that when applying to a **Local Authority, or An Bord Pleanála**, 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 Pleanála, 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*  
**Paillíún 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](mailto:environmentalco-ordination@agriculture.gov.ie)  
[www.agriculture.gov.ie](http://www.agriculture.gov.ie)

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**From:** Owen Cahill [<mailto:ocahill@mkoireland.ie>]  
**Sent:** 18 May 2020 11:47  
**To:** Environmental Co-ordination (Inbox)  
**Subject:** 191223-a - Scoping Document - Cleanrath Renewable Energy Development

**CAUTION:** This Email originated from Outside of this department. Do not click links or open attachments unless you recognise the sender and know the content is safe. Otherwise Please Forward any suspicious Emails to [Notify.Cyber@agriculture.gov.ie](mailto:Notify.Cyber@agriculture.gov.ie) .

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for the existing Cleanrath Renewable Energy Development in Co Cork.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development.

If you have any queries, please do not hesitate to contact me.

Regards,

Owen Cahill



Owen Cahill B.Sc. M.Sc. (Env) CEnv  
Environmental Engineer  
**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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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-ghaigh 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 scríos an t-ábhar ó do ríomhaire le do thoil.



**Roinn Cumarsáide,  
Fuinnimh & Acmhainní Nádurtha**  
Department of Communications,  
Energy & Natural Resources



Eoin McCarthy  
McCarthy Keville O'Sullivan  
Block 1, G.F.S.C.  
Moneenageisha Road  
Galway

11 January 2016

**RE: EIA Scoping Document for Proposed Wind Energy Development at Cleanrath North, Cleanrath South and Derrineanig, Macroom, Co. Cork**

**Project Number: 110721-c**

**GSI Ref: 15/232**

Dear Eoin,

I would like to acknowledge receipt of your email and attachment of the 3<sup>rd</sup> December 2015 concerning the above.

**1. GUIDELINES**

The *Ground Conditions/Geology Section (5.3)* of the DOEHLG Wind and Energy Development Guidelines (2006) emphasises the importance of carrying out “geological and geotechnical assessment of the bedrock with regard to slope stability”.

The following guidelines may also be of assistance:

- Irish Wind Energy Association (IWEA), 2012. Best Practice Guidelines for the Irish Wind Energy Industry.
- Institute of Geologists of Ireland (IGI), 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.

**2. DATASETS AND VIEWERS**

To assist you with the compilation of the “Soils & Geology” and “Water” chapters of the Environmental Impact Assessment, and also future ones, maps and datasets are currently available for viewing and/or download on GSI website under “Online Mapping”- direct link: [www.gsi.ie/mapping.htm](http://www.gsi.ie/mapping.htm) with the new “GSI Spatial Resources Viewer” (2016):

<http://dcenr.maps.arcgis.com/apps/MapSeries/?appid=a30af518e87a4c0ab2fbde2aac3c228>

Datasets can be downloaded from:

<http://www.dcenr.gov.ie/natural-resources/en-ie/Geological-Survey-of-Ireland/Pages/Data-Downloads.aspx>



## **2.1.Landslides data**

Landslide and slope stability risk assessment for the site is recommended, as per above mentioned guidelines. For landslide records dedicated viewer, see [www.gsi.ie/mapping](http://www.gsi.ie/mapping) or direct link: <http://spatial.dcenr.gov.ie/GeologicalSurvey/LandslidesViewer/index.html> .

The GSI is compiling a National Landslide Susceptibility Map with associated viewer. The data is currently available for east Leinster and the greater Cork region. For updates on this mapping programme, visit: <http://www.gsi.ie/Programmes/Quaternary+Geotechnical/Landslides/National+Landslide+Susceptibility+Mapping.htm>.

Should you have any query in relation to the landslide database, please contact Charise McKeon, Landslide Susceptibility Mapping Project, at [charise.mckeon@gsi.ie](mailto:charise.mckeon@gsi.ie) , 01-678 2752.

## **2.2.Geological Heritage data**

Geological Heritage should be covered under the “Soils and Geology” chapter.

Geological Heritage data can now be viewed online on the “GSI Spatial Resources Viewer” at the above mentioned link or through its dedicated viewer: <http://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b245c2bd11a64162a1632ad6bccf8e34&scale=0>

There are two map layers under ‘**GSI - Irish Geological Heritage Sites**’:

**1. ‘Heritage Sites Audited Boundaries’:** a national dataset (one shapefile with boundary polygons) showing the County Geological Sites that have been audited to date (16 counties available in 2016).

County Geological Sites audit data are also available for download as individual county shapefiles and site report pdfs at: <http://www.gsi.ie/Programmes/Heritage+and+Planning/County+Geological+Sites+Audits/>

**2. ‘ Heritage Sites Unaudited Boundaries’:** a national dataset (one shapefile with buffer polygons) covering all the other counties not yet audited, indicating the provisional location/extent of sites. These sites have buffers appropriate to their type (or theme), ranging between 200m, 500m and 1000m (for the largest landscape/glacial features). These are not ‘mitigation’ buffers, but an attempt to encompass the extent of the particular type of site. These are not yet available to download. The ‘No Boundaries’ data is provisional data only. As each county’s geological heritage is audited, the ‘No Boundaries’ data will be replaced with the audited ‘Boundaries’ data, so please re-visit the viewer regularly for updates. There can also be *ad hoc* updates of individual site data at any time.

Please note that all the above sites are of, at least, County Geological Site (CGS) status (some are also recommended for designation as Natural Heritage Areas) and are included in the relevant County Development Plan with associated protection objective/s or policy.

Should you identify a Geological Heritage Site with buffer within your study area in the future, please contact Sarah Gatley, Geological Heritage and Planning Programme, at [sarah.gatley@gsi.ie](mailto:sarah.gatley@gsi.ie), 01-678 2837 for further information and possible mitigation measures if applicable.



### **2.3. Aggregate Potential Mapping**

In order to document the “Geological Resource Importance” chapter, please note that GSI Minerals Programme has compiled an “Aggregate Potential Mapping” (APM) project (for crushed rocks and sand and gravel pits) with an online viewer accessible either from GSI website: [www.gsi.ie/mapping](http://www.gsi.ie/mapping) or direct link: <http://spatial.dcenr.gov.ie/GeologicalSurvey/APM/> . Only half of the country data have been published online so far, but data have been compiled for the entire country. Should you have any query on the APM project, or require the data that are not yet available online, please contact Gerry Stanley, Minerals Programme, at [gerry.stanley@gsi.ie](mailto:gerry.stanley@gsi.ie), 01-678 2863.

### **3. EIA SCOPING DOCUMENT, COMMENTS FOR THE PROPOSED TABLE OF CONTENTS (4.2.5.) CHAPTERS 6 “GEOLOGY & SOILS” AND 7 “HYDROLOGY & HYDROGEOLOGY”**

#### **6.3.2. Soils and Subsoils**

Most of the proposed windfarm area is exposed bedrock, with a bit of peat and some till derived from Devonian Sandstone. There is a record of peat slide at about 7 km North West of the proposed windfarm. The landslide database is far from exhaustive. I would refer to the above paragraphs “Guidelines” and “Landslides data”.

#### **6.3.3. Bedrock geology**

Two faults along with Geological Formations boundaries have been identified within the perimeter of the proposed windfarm. These represent faster entry pathways for contaminants to groundwater.

#### **6.3.4. Geological Resource Importance**

The APM indicates that the Southern half and the North Eastern parts of the proposed windfarm yield a high potential for crushed aggregates.

#### **6.3.5. Geological Heritage**

There are no sites of geological heritage interest within the perimeter of the proposed windfarm. The closest identified geological heritage sites lie between 3 to 10 km from the proposed windfarm and are unlikely to be affected by the development, therefore no impact is anticipated on geological heritage.

Concerning the proposed underground grid connection cable route, from Figure 2.4., it is proposed to go through the “Ballingeary Esker”, which has been identified as a geological heritage site, located between Gorteenakilla and Gurteenowen, North East of the Bunsheelin River. However, as the proposed route appears to follow the existing road infrastructure, disruption to the “Ballingeary Esker” should be minimal and shouldn’t alter the site integrity. However, should you anticipate otherwise, please contact Sarah Gatley, Head of the Geological Heritage and Planning Programme, at [sarah.gatley@gsi.ie](mailto:sarah.gatley@gsi.ie), 01-678 2837 for further information and possible mitigation measures if applicable.

#### **6.4.2. Impacts during construction phase**

Soils are already limited within the proposed windfarm area. Any soil removal will have implication for groundwater vulnerability as loss of filtering layers allows contaminants to enter groundwater faster.

Also careful consideration should be given for the disposal of soil removed, especially in peat area, to avoid triggering any landslide, and in particular for the works relating to the underground grid connection cable route section in Co. Kerry.



#### **7.4.2. Impacts during construction phase**

Groundwater vulnerability is classified as extreme for the proposed windfarm area due to mainly exposed bedrock. Any removal of remaining soils/subsoils will increase groundwater vulnerability. Therefore measures for waste water disposal, cement discharge and fuel leakages/spillages linked to the construction phase mainly, should be addressed in the EIA along with an emergency plan in place before works start to prevent pollution and contamination of groundwater.

The potential impacts for surface water would be mainly linked to sudden discharge of sediments and soils into streams and rivers crossed along the proposed underground grid connection cable route. Best practice should prevail.

#### **4.OTHER COMMENTS**

At a later stage, GSI would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to GSI'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](mailto:beatriz.mozo@gsi.ie), 01-678 2795.

I hope that these comments are of assistance, and if the GSI can be of any further help, please contact me.

Yours sincerely,



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Sophie Préteseille, Geologist  
Information Management Programme  
E. [sophie.preteseille@gsi.ie](mailto:sophie.preteseille@gsi.ie)  
T. 01-678 2897





Owen Cahill  
MKO  
Tuam Road  
Galway  
H91 VW84  
Ireland

20 May 2020

**Re: EIA Scoping Document for the Cleanrath Renewable Energy Development, Co. Cork**

**Your Ref: 191223-a**

**Our Ref: 20/92**

Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources 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 Owen

With reference to your email/letter received 11 May 2020, concerning Cleanrath Renewable Energy Development, located in the townlands of Cloontycarthy, Cleanrath North, Cleanrath South, Derrineanig, Milmorane, Coomlibane, Rathgaskig, Augeris, Gorteenakilla, Carrignadoura, Gurteenowen, Gurteenflugh, Lyrenageeha and Lackabaun Co. Cork, Geological Survey Ireland (a division of Department of Communications, Climate Action and Environment) would like to note that a formal response was provided in 2016 in relation to the same windfarm development a copy of which is attached for your reference. In addition, Geological Survey Ireland would like to make the following comments:

#### **Geoheritage**

Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) 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 Irish Geoheritage Programme (IGH) of GSI, 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 are now 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. Unaudited CGS's (sites identified from published data and available knowledge) in County Cork identified prior to completion of an audit can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The CGS audit for Co. Cork has not yet been carried out. **Our records show that there are no unaudited CGSs within the subject development site boundary.**

Concerning the installed underground grid connection cable route, it appears to go through the "Ballingeary Esker", which has been identified as a geological heritage site, located between Gorteenakilla and Gurteenowen, North East of the Bunsheelin River. However, as the route appears to follow the existing road infrastructure, disruption to the "Ballingeary Esker" should have been minimal and should not have altered the site integrity.



Therefore, with the current development, there are no envisaged impacts on the integrity of current unaudited CGSs by the proposed development. However, if the proposed development plan is altered, please contact Clare Glanville ([Clare.Glanville@gsi.ie](mailto:Clare.Glanville@gsi.ie)) for further information and possible mitigation measures if applicable.

### **Geological Mapping**

Geological Survey Ireland (GSI) geological mapping programme creates maps that depict the rocks (Bedrock Mapping) and subsoils (Quaternary Mapping) of the onshore area of Ireland. We collect new data by field surveying and borehole drilling, and combine them with existing mapping to produce map products at various scales and levels of complexity. GSI maintains online data sets of bedrock and subsoils geological mapping that is reliable, accessible and meets the requirements of all users. These data sets include depth to bedrock data and subsoil classifications. We would encourage you to use these data which can be found [here](#), in your assessments.

### **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. Through our [Groundwater Programme](#), Geological Survey Ireland provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI's National Aquifer and Recharge maps on our [Map viewer](#) to this end.

### **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. **The landslide susceptibility mapping for County Cork shows that the subject development site is generally classified as a low to medium susceptibility.** We welcome the inclusion of a geotechnical peat assessment as part of the EIAR process. We recommend that geohazards be taken into consideration, especially when developing areas where these risks and susceptibility are prevalent, and we encourage the use of our data when doing so. **Our data shows no recorded landslides within the subject development site.**

### **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](#). Our Aggregates Potential Map records a high variability in crushed rock aggregate potential and little to no granular aggregate potential in the wider vicinity of the subject development site **and consideration to aggregate potential sterilisation should be included as part of the EIAR process.** The Active Quarries database shows a number of active quarries of both rock and sands and gravels in the wider study area. The relevant data sets described above could be considered as part of 'sustainability' under the 'Material Assets' and 'Land, Soils and Geology' and chapters of the EIAR.

### **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 strongly recommend that this database be consulted as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of the



development area. This information may be beneficial and cost saving for any site specific investigations that may be designed as part of the development.

We note that consultants to you will be undertaking a geotechnical site investigation; Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to GSI'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, Geological Mapping Unit, at [Beatriz.Mozo@gsi.ie](mailto:Beatriz.Mozo@gsi.ie) , 01-678 2795.

#### **Other Comments**

We note that this is an initial EIA Scoping Report exercise; however as the national earth science agency it is disappointing that our datasets are not referenced within the document. Please ensure the above referenced data is considered in the planning process in relation to Appropriate Assessment (AA) and Environmental Impact Assessment Report (EIAR) stages as required. I hope that the attached correspondence from GSI in 2016 will also be of use.

Finally, we would also like to draw your attention to the Departments of Housing, Planning and Local Government and Communications, Climate Action and the Environment that recently published the revised Wind Energy Development Guidelines (WEDG) for public consultation (which closed on 19 February 2020). In the meantime if you have any questions in relation to our data sets or if we can be of further assistance, please do not hesitate to contact me, Dr. Clare Glanville ([clare.glanville@dcca.gov.ie](mailto:clare.glanville@dcca.gov.ie) )

Yours sincerely

**Dr. Clare Glanville**  
**Senior Geologist**  
**Planning and Geoheritage Programme Lead**



**An Roinn Cosanta**  
Department of Defence

MKO  
Tuam Road  
Galway  
Ireland H91 VW84  
FAO: Owen Cahill

3 June 2020

**Re: Scoping Document Request : Cleanrath Renewable Energy Co. Cork**

Dear Owen,

I write with regard to the above mentioned pre planning request and your email/letter to this office on the 18<sup>th</sup> May 2020.

The Department of Defence has the following observations, based on the information given, to make on this matter.

In all locations where windfarms are permitted it should be a condition that they meet the following lighting requirements :

1. Single turbines or turbines delineating corners of a windfarm should be illuminated by high intensity obstacle strobe lights (Red).
2. Obstruction lighting elsewhere in a windfarm will be of a pattern that will allow the hazard be identified and avoided by aircraft in flight.
3. Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum specifically at or near 850nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light. Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment.

Yours sincerely,

Raymond Myles  
Planning and Disposals  
Property Management  
Ph : 045-492036  
E mail : Raymond.myles@defence.ie

## Celine Hughes

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**From:** John Bagnall <john.bagnall@eir.ie>  
**Sent:** Friday 15 May 2020 07:34  
**To:** Owen Cahill  
**Cc:** Mobile Networks TXN  
**Subject:** Re: FW: 191223-a - Scoping Document - Cleanrath Renewable Energy Development

Hi Owen,

There should be no impact to the transmission services of Eir that will be affected by these works. Best of luck with your proposal.

Please keep sending future windfarm development analysis and large infrastructure project requests to [MobileNetworksTXN@eir.ie](mailto: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](mailto:john.bagnall@eir.ie)

Address: EirCode - D24 HX03

On Wed, 13 May 2020 at 17:26, Owen Cahill <[ocahill@mkoireland.ie](mailto:ocahill@mkoireland.ie)> wrote:

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for the existing Cleanrath Renewable Energy Development in Co Cork.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development.

If you have any queries, please do not hesitate to contact me.

Regards,

Owen Cahill



Owen Cahill B.Sc. M.Sc. (Env) CEnv  
Environmental Engineer

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

[www.mkoireland.ie](http://www.mkoireland.ie)



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**Fáilte Ireland**  
National Tourism Development Authority

## **EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects**



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An tÚdarás Náisiúnta Forbartha Turasóireachta  
Áras Fáilte, 88–95 Sráid Amiens  
Baile Átha Cliath 1  
D01 WR86  
Éire

National Tourism Development Authority  
Áras Fáilte, 88 - 95 Amiens Street  
Dublin 1  
D01 WR86  
Ireland

Phone 1890 525 525  
or +353 1 884 7700  
Email [info@failteireland.ie](mailto:info@failteireland.ie)  
[www.failteireland.ie](http://www.failteireland.ie)

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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 Cunnane Stratton Reynolds on behalf of Fáilte Ireland to update their EIA guidelines in line with changes in legislative 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 **€8.4 billion**, and exchequer revenue of **€1.78 billion** in 2018, which helps fund other key public services.

In 2018 Ireland welcomed **10.6 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority. 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 Draft guidelines on the information to be contained in Environmental Impact Assessment Reports in August 2017. At the time of this document the guidelines have not been adopted from draft.

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, which this document should be read in conjunction with and used as supplementary guidance to. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

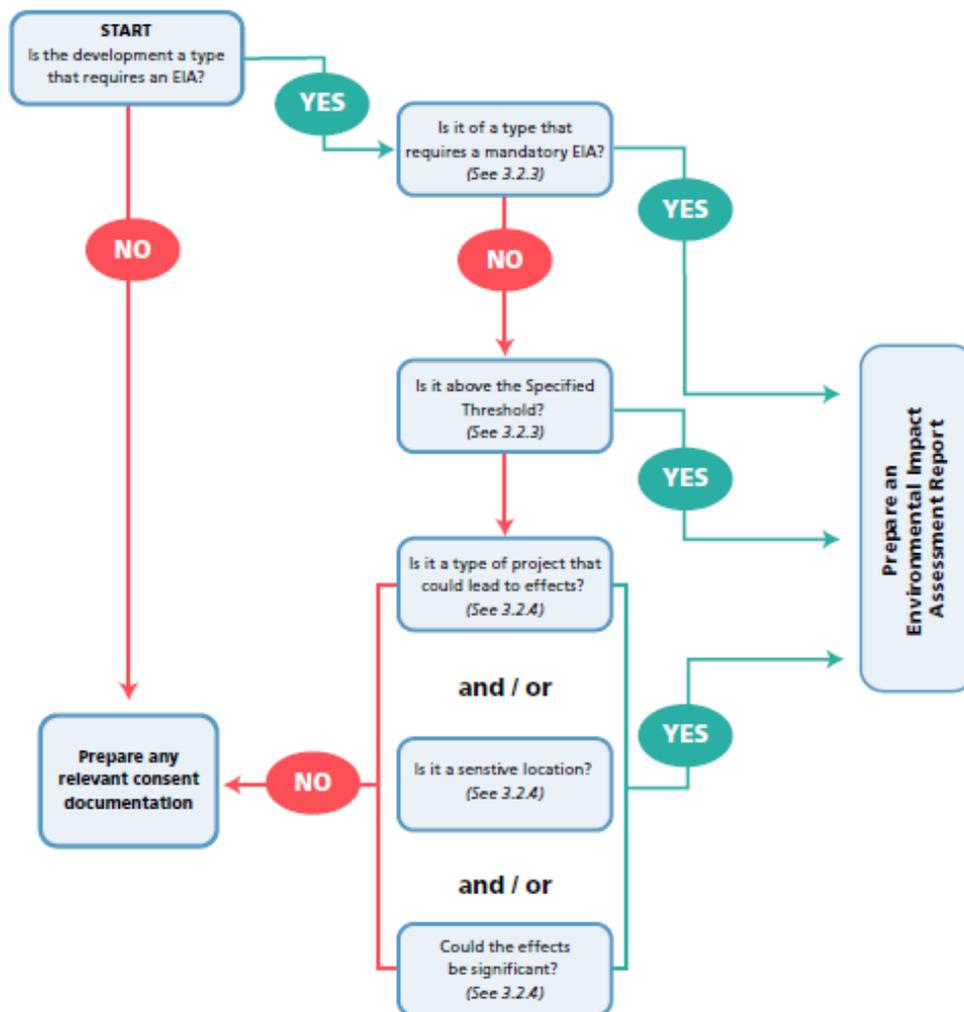
#### ***Screening***

Through EIAR 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 do 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 below 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 will still be a requirement for an EIAR for that development.

## *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 - forest trails, 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 have potential 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 2018 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 Draft 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 (eg. 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;
- impact assessment;
- cumulative impact
- interaction of impacts
- mitigation.

### ***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 alternatives is a requirement of EIAR

Where tourism projects are location dependent the assessment of alternatives should consider alternative methods and technologies, detail the key considerations culminating in the selection of the 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 developer is expected to consider reasonable alternatives. What is considered reasonable may vary from case to case.

### ***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 dependant on its **Context, Character, Significance, and Sensitivity**, as outlined in the Draft 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. Where possible the value of the contribution of such tourism assets and activities to the local economy should 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 Draft 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 assets under the 'material assets' topic 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.

#### 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 impact. Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

#### 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. 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 activity proposed and sensitivity of the location.

## 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 but is generally not kept in situ except in key cases which could also be considered under cultural heritage.

## 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 are utilities and infrastructure. Tourism itself could be considered a material asset as its impact upon the economy and the infrastructure in place to support it is a material consideration in assessing economic impact.

## 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 Effects***

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 EIAR Screening Report.

### ***Mitigation***

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.

### ***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.

## **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, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which 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 Authorities*

Regional Authorities can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) 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.



North Lee Environmental Health Service,  
Floor 2, Block 1 St Finbarr's Hospital,  
Douglas Road,  
Cork,

Phone: 021 4921801  
E-Mail:shane.oflynn@hse.ie

**Date:** 17 June 2020

**Name:** Mr Owen Cahill, McCarthy Keville O'Sullivan Ltd., MKO,  
Tuam Road, Galway

**Consultant's reference:** 191223a

**Re:** Scoping Report

**Proposed development:** Substitute consent for Cleanrath Renewable Energy Development,  
Cleanrath and adjacent townlands, Co. Cork

**Applicant:** Cleanrath Wind Farm Ltd.

**EHIS ref:** 1173

Dear Mr Cahill

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 15 May 2020

- Emergency Planning – David O'Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/ Laura Murphy
- CHO – Ger Reaney

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

Yours sincerely

A handwritten signature in blue ink that reads 'John Maher'.

John Maher  
A/Principal Environmental Health Officer

## HSE EIA Scoping

### Environmental Health Service Submission Report

**Date:** 17 June 2020

**Our reference:** EHIS 1173

**Report to:** Mr Owen Cahill, McCarthy Keville O'Sullivan Ltd., Tuam Road,  
Galway

**Type of Consultation:** EIA Scoping

**Applicant:** Cleanrath Wind Farm Ltd Ltd.

**Proposed Development:** The applicant proposes to apply to An Bord Pleanála for substitute consent for the development of a 9 turbine wind farm (which has already been constructed) at a site located approximately 12 km southwest of Macroom, Co. Cork. The proposed development will include the laying of a grid connection cable and the construction of a turbine delivery route.

Planning permission was granted by An Bord Pleanála in 2017 for the construction of an 11 turbine wind farm and construction commenced in 2018. Following a legal challenge to the decision, the Supreme Court quashed the decision of An Bord Pleanála in December 2019. In order to regularise the works already completed and to obtain consent for the future operation of the wind farm, the applicant intends to submit an application for substitute consent with An Bord Pleanála.

#### General Introduction

The following documents should be considered 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\\_pleanala\\_on\\_carrying\\_out\\_eia\\_-\\_august\\_2018.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanala_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](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/reviewofdraftteisguidelinesadvicenotes/>

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 increased requirement to assess likely significant impacts on Population and Human Health. In the experience of the Environmental Health Service (EHS) impacts on human health are generally inadequately assessed in EIA 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](http://www.publichealth.ie)

It should be noted that the positive likely significant impacts should be identified and assessed, not just any likely negative significant impacts from the proposed development.

The HSE will consider the final EIAR accompanying the planning application and will in particular make comments to the 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 (EH) Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 8 May 2020. In addition to supporting the requirement for assessment of those factors identified in your correspondence, the Environmental Health Service (EHS) also recommends that the following matters are highlighted for your attention.

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

### **Public Consultation**

Although the development has commenced it is strongly recommended that 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 project must be fully informed of what the project entails, especially with regard to potential associated effects 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.

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.

### **Decommissioning Phase**

The EIAR should detail not only how the existing turbines will be decommissioned, but what the eventual fate of the turbines and associated material will be, i.e. will the material be reused 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.

### **Siting and Location of Turbines**

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

### **Opportunity for Health Gain**

The EPA has issued guidance with regard to meeting the requirements of Directive 2014/52/EU. The proposed development should be assessed with a view to including opportunities for health gain within the site of the wind farm by including greenways, cycle-paths or walking routes within the development site.

### **Noise & Vibration**

The potential impacts for noise and vibration from the 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/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 any remaining construction works and the operational phase of the wind farm development must be undertaken which details the change in the noise environment resulting from the wind farm development

### **Shadow Flicker**

It is recommended that a shadow flicker assessment is undertaken to identifying all dwellings and sensitive receptors which may be impacted by shadow flicker. The assessment must include all proposed mitigation measures

### **Air Quality**

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
- Enclose delivery vehicles
- 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 of the proposed wind farm development.

### **Surface and Ground Water Quality**

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

### **Ancillary Facilities**

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

### **Cumulative Impacts**

The impact on sensitive receptors of the wind farm development combined with any other similar developments in the vicinity should be considered. The EIAR should identify all existing and proposed wind farm developments in the area and should assess any likely significant cumulative impacts of the proposed Cleanrath Wind farm development.



Shane O'Flynn,  
Environmental Health Officer  
HSE South,  
North Lee Environmental Health Service,  
Floor 2, Block 1,  
St Finbarr's Hospital,  
Douglas Road,  
Cork



Environmental Health Officer  
Environment OU  
Ennistymon Health Centre  
Ennistymon  
Co. Clare



<b>HSE South Emergency Management Consultation Report</b>			
<b>Report to</b>	Catherine McCarthy, PEHO, North Lee	<b>Date</b>	8 <sup>th</sup> June, 2020
<b>Type of consultation:</b>	EIS <input type="checkbox"/> Scoping X Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>		
<b>Other (please specify)</b>			
<b>Authority</b>	Health Service Executive		
<b>Authority Reference Number</b>	EHIS 1173		
<b>EM Reference Number</b>	EMENV 040		
<b>Applicant</b>	MKO, Tuam Road, Galway		
<b>Proposal</b>	Existing Cleanrath Renewable Energy Development in Co. Cork – application to apply for substitute consent granted by An Bord Pleanála.		

**HSE South Emergency Management Observations:**

Please be advised that the HSE South Emergency Management function does not have any specific observations to make with respect to this application. However, please note the following recommendations within the context of site operations:

1. Should an incident occur at the site and the site operator requires the assistance of the emergency services, the incident information should be provided in the `ETHANE` format (please see attached).
2. Emergency Services access to the site should be clearly identified. This should be undertaken via appropriate high visibility signage, i.e.; a green sign with a yellow border and white lettering citing the abbreviation RVP
3. The site should have a mechanism in place to account for personnel during an evacuation in order to provide the responding emergency services with an estimate of the number of people accounted and unaccounted for.
4. The site should identify any critical / vulnerable facilities within the geographical catchment area, such as hospitals, schools, nursing homes, etc, that could be directly or indirectly affected by an incident at the site.
5. Where the `off-site` impacts of an incident at the site affects a vulnerable cohort / population such as children within crèches, schools; patients / clients / residents within nursing homes, etc; the emergency services will require assistance from the site operator in determining the impact on the local community.
6. The site operator is encouraged to develop a business continuity plan that includes a plan for severe weather. For more advice on this, please see the Department of Business, Enterprise and Innovation, *Business Continuity Planning in Severe Weather*. <https://dbei.gov.ie/en/Publications/Publication-files/Business-Continuity-Planning-in-Severe-Weather-Check-List-for-Businesses.pdf>

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or [maryanne.horgan@hse.ie](mailto:maryanne.horgan@hse.ie)



Dial 999 / 112 – Request the service you require: An Garda Síochána, Ambulance Service and / or Fire and Rescue Service

**WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)**

**GIVE THE FOLLOWING INFORMATION**

This is: \_\_\_\_\_ Eircode \_\_\_\_\_  
(Name, Telephone Number and Eircode Address of site)

*An incident has occurred at this site - standby for ETHANE message*

<b>E</b>	
	Exact location of the incident
<b>T</b>	
	Type of incident, e.g.; fire, explosion, gas leak, etc
<b>H</b>	
	Hazards – current and potential
<b>A</b>	
	Access and Egress – what is the safest approach route for responding emergency services and where is your emergency services meeting point (RVP)
<b>N</b>	
	Number of casualties and their condition – specify adult / children if known
<b>E</b>	
	The emergency services present and required

R.V.P.  
No.1

**N.B. If you require another emergency service stay on the line and repeat the steps again**



19<sup>th</sup> June 2020

Mr Owen Cahill  
McCarthy Keville O Sullivan  
Planning & Environmental Consultants  
Block 1, G.F.S.C.  
Moneenageisha Road,  
Co Galway



**Development: Renewable Energy Development in Co Cork Cleanrath Wind Farm at townlands of aontycarthy, Oeanrath North, Cleanrath South, Derrineanig, Milmorane, Coomlibane, Rathgaskig, Augerls, Gorteenakilla, Canignadoura, Gurteenowen, Gurteenflugh, Lyrenageeha and lackabaun Co. Cork. Ref: 191223a**

Dear Owen

I refer to the request for planning permission for the above development, details of which were received by the Irish Aviation Authority from your company.

It is the observation of the Irish Aviation Authority that In general terms, the Authority has no specific requirements in relation to this request for information in relation to the development of an Environmental Impact Assessment for the proposed Cleanrath Renewable Energy Project, located approximately 12kms Southwest of Macroom to consist of 11 wind turbines with a blade tip height of 150ms. Based on the information provided, during the formal planning process, the Authority will likely provide the following general observation: 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 development,
- (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations

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

- (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.



This would be in accordance with the previous grant of permission by ABP (PL 04.246742), condition No. 06"

Yours sincerely

Deirdre Forrest  
Corporate Affairs

MKO  
Tuam Road  
Galway  
H91 VW84  
Ireland

25 May 2020

**Re: EIAR Scoping Request - Cleanrath Renewable Energy Development, Co. Cork**

Dear Mr Cahill,

Irish Water (IW) acknowledges receipt of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for the Cleanrath Renewable Energy Development in the townlands of Cloontycarthy, Cleanrath North, Cleanrath South, Derrineanig, Milmorane, Coomlibane, Rathgaskig, Augeris, Gorteenakilla, Carrignadoura, Gurteenowen, Gurteenflugh, Lyrenageeha and Lackabaun, Co. Cork

Please see attached our suggested scope in relation to Water Services. On receipt of the planning referral, Irish Water will review the EIAR as part of the planning process.

Queries relating to the terms and observations above should be directed to [planning@water.ie](mailto:planning@water.ie)

Yours sincerely,

Signed on behalf of Irish Water:

Maria O'Dwyer  
Connections and Development Services

**Uisce Éireann**  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

**Irish Water**  
PO Box 6000  
Dublin 1  
D01 WA07  
Ireland

T: +353 01 89 25000  
T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

## Response to EIAR Scoping Report Requests

IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

- a) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- b) Any up-grading of water services infrastructure that would be required to accommodate the development.
- c) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- d) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- e) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- f) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development to [datarequests@water.ie](mailto:datarequests@water.ie). Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- g) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- h) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence/ present a risk to the quality of the water abstracted by IW for public supply.
- i) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- j) Mitigation measures in relation to any of the above

*This is not an exhaustive list.*

**Uisce Éireann**  
 Bosca OP 6000  
 Baile Átha Cliath 1  
 D01 WA07  
 Éire

**Irish Water**  
 PO Box 6000  
 Dublin 1  
 D01 WA07  
 Ireland

T: +353 01 89 25000  
 T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

Please note

- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.
- Irish Water will not accept new surface water discharges to combined sewer networks
- Where an Irish Water asset is altered or diverted, a Diversion Agreement is required. To commence this process, the applicant is requested to submit a Diversion enquiry once a preferred route has been selected. Details on this process can be found at <https://www.water.ie/connections/developer-services/diversions/>. Any design proposal to divert an Irish Water asset must be completed in accordance with IW Standard Details and Codes of Practice which are available on the Irish Water website.
- All necessary measures to protect and maintain access to Irish Water infrastructure and water sources shall be undertaken and incorporated into any proposals for road design. Irish Water request continued engagement through the route selection, design and construction stages in order to ensure public water services and sources are protected and access is maintained.

**Uisce Éireann**  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

**Irish Water**  
PO Box 6000  
Dublin 1  
D01 WA07  
Ireland

T: +353 01 89 25000  
T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

## Celine Hughes

---

**From:** Matthew Craig <matthew.craig@2rn.ie>  
**Sent:** Monday 11 May 2020 14:56  
**To:** Owen Cahill  
**Cc:** Johnny Evans; windfarms@rte.ie  
**Subject:** RE: 191223-a - Scoping Document - Cleanrath Renewable Energy Development

Hi Owen,

As there is a reduction of turbines and their location has not changed, the existing assessment and accompanying Protocol between 2rn and the Developer still stands.

Regards

**Matthew Craig**

Project Engineer  
Projects and Coverage Planning  
2RN  
Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland  
D24 WK28  
Phone: + 353 (0) 1 2082261  
Mobile: + 353 (0) 87 7509955

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**From:** Owen Cahill <ocahill@mkoireland.ie>  
**Sent:** 11 May 2020 13:30  
**To:** Matthew Craig <matthew.craig@2rn.ie>  
**Cc:** Johnny Evans <Johnny.Evans@2rn.ie>; windfarms@rte.ie  
**Subject:** 191223-a - Scoping Document - Cleanrath Renewable Energy Development

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for the existing Cleanrath Renewable Energy Development in Co Cork.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development.

If you have any queries, please do not hesitate to contact me.

Regards,

Owen Cahill



Owen Cahill B.Sc. M.Sc. (Env) CEnv  
Environmental Engineer

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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## Celine Hughes

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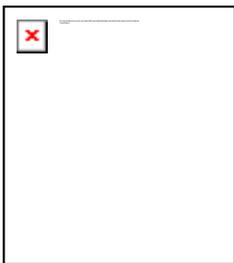
**From:** Gerry Callan <Gerry.Callan@three.ie>  
**Sent:** Monday 25 May 2020 09:32  
**To:** Owen Cahill  
**Cc:** DL Estates ROI; Alan Hutchinson  
**Subject:** RE: 191223-a - Scoping Document - Cleanrath Renewable Energy Development

Hi Owen,

I've reviewed the Cleanrath Renewable Energy Development in Co. Cork on behalf of the 3 Transmission Network and am happy to confirm that we have no objections or concerns relating to it, nor to the retention of the existing turbines at this location.

Should there be any changes, do please let us know and we'll review the development once again, but for now this is not an issue for us.

Best wishes,



**Gerry Callan**  
Transmission Engineer

086 3884246  
gerry.callan@three.ie



**Make it count.**

---

**From:** Owen Cahill <ocahill@mkoireland.ie>  
**Sent:** 11 May 2020 11:37  
**To:** Gerry Callan <Gerry.Callan@three.ie>  
**Subject:** 191223-a - Scoping Document - Cleanrath Renewable Energy Development

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for the existing Cleanrath Renewable Energy Development in Co Cork.

As part of the scoping exercise, we would welcome any comments in relation to the Subject Development.

If you have any queries, please do not hesitate to contact me.

Regards,

Owen Cahill



Owen Cahill B.Sc. M.Sc. (Env) CEnv  
Environmental Engineer

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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**Three Ireland**  
28/29 Sir John Rogerson's Quay, Dublin 2, Ireland.

[www.three.ie](http://www.three.ie)

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## Celine Hughes

---

**From:** Owen Cahill  
**Sent:** Thursday 28 May 2020 13:59  
**To:** Owen Cahill  
**Subject:** FW: TII20-109529 - EIA Scoping for Cleanrath Renewable Energy Development, Co. Cork

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**From:** INFO <[Information@tii.ie](mailto:Information@tii.ie)>  
**Sent:** 26 May 2020 14:20  
**To:** MKO-Admin <[info@mkoireland.ie](mailto:info@mkoireland.ie)>  
**Subject:** TII20-109529 - EIA Scoping for Cleanrath Renewable Energy Development, Co. Cork

**FAO Mr. Owen Cahill**

**Re: EIA Scoping in relation to Cleanrath Renewable Energy Development, Co. Cork (Ref. 191233-a)**

**Dear Mr. Cahill,**

I refer to your correspondence of 8 May 2020 regarding the above.

Transport Infrastructure Ireland (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 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](http://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.

TII e.mailed requesting an electronic copy of the EIA Scoping Report on 14 May, 2020, due to current constraints in accessing hard copy post items. It is acknowledged that the EIA Scoping Report was received by return e.mail.

With respect to EIA scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIA, which may affect the National Roads Network.

The developer/scheme promoter should have regard, *inter alia*, to the following;

- 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 the vicinity of the subject development site, e.g. N22 Baile Bhuirne to Macroom Scheme,
- TII would be specifically concerned as to potential significant impacts the development would have on the existing national road network (and junctions with national roads) in the proximity of the proposed development, e.g. existing N22,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the areas concerned. The developer should in particular have regard to any potential cumulative impacts,
- The developer, in preparing EIA, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works),

- The developer, in preparing EIAR, should have regard to 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* (1<sup>st</sup> Rev., National Roads Authority, 2004)),
- 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 Authority'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 NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA,
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network,
- In relation to haul route identification, the applicant/developer should 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, including where temporary modification to the road network may be required. Consultation with relevant PPP Companies and MMarC Contractors may also be required. All structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed,
- Where any modifications to grid connection may be required in the subject development, the scheme promoter should note locations of existing and future national road schemes and develop proposals to safeguard proposed road schemes. 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 and/or motorway network where applicable.

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,

**Michael McCormack**  
Senior Land Use Planner



 [www.tii.ie](http://www.tii.ie)  
 [info@tii.ie](mailto:info@tii.ie)  
 +353 (01) 646 3600

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