



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

HSE South,
Consumer Affairs Dept.,
Office Complex,
Kilcreene Hospital,
Kilkenny.

Telephone 353 56 7785598
Fax 353 56 7785549
Email: foi_sea@hse.ie

Mr Robert Hunt
Senior Project Manager (TOBIN Consulting Engineers)
For and on behalf of Coillte Cuideachta Ghníomhaíochta Ainmnithe
TOBIN Consulting Engineers
Block 10 – 4
Blanchardstown Corporate Park
Dublin 15.
D15 X98N

21st February 2020

Dear Mr Hunt

I am returning your Scoping Report and your request for a submission as we believe you have sent this to the wrong department.

From this office we deal with all Freedom of Information, Data Protection – GDPR, Complaints re: HSE Services and Service Users etc. We would not be in a position to reply to the enclosed documentation.

Can I suggest if you need a local HSE submission you contact our Head Office – HSE South, Lacken, Dublin Road, Kilkenny – 056 7784100?

Yours sincerely

Debbie Kavanagh
Consumer Affairs Department
HSE South

TOBIN CONSULTING ENGINEERS		
PROJECT NO:		
FILE REF:		
Date Received 24 FEB 2020		
PASS TO		DATE

21 FEB 2020



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Email: info@tobin.ie

Our Ref: 10730-L-003-q

19 February 2020

HSE South
Consumer Affairs
Kilcreene Administration Building
Kilkenny

Re: Proposed Development of Castlebanny Wind Farm, Castlebanny, Co. Kilkenny.

Dear Sir/Madam,

Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte) and ART Generation propose to develop the Castlebanny Wind Farm in south central Kilkenny in the townlands of Castlebanny, Baunskeha, Derrynahinch, Kiltorcan, Castlecoster, Coolroebeag, Kilvinoge, Cappagh, Coolnahau, Mullennakill, Ballytarsna, Glenpipe and Derrylacky.

At this point, the proposed development consists of a wind farm with approximately 21 no. turbines, an estimated output capacity of c. 110 MW and a maximum turbine blade tip height of 185m. The development will also include connection of the wind farm to the electrical grid network, on-site substation, electrical and telecommunication infrastructure, access roads and temporary construction compound. It should be noted that these project elements are provisional and are subject to review as the project design, environmental studies and consultation works progress.

The overall site measures c. 1600 hectares (ha) and is predominantly covered in active Coniferous forestry plantation. Approximately 1200 ha are in Coillte's ownership whilst the remaining 400 ha comprise third-party owned areas of agricultural grassland, arable crops and commercial forest. There is an extensive network of existing access roads across the site to facilitate the ongoing forestry operations as well as local access to farmlands. The South Leinster Way walking/hiking trail, running from Kildavin in Co. Carlow to Carrick-on-Suir in Co. Tipperary, crosses the southern portion of the site.

Due to the scale of the proposed development, it is envisaged that the planning application will be submitted directly to An Bord Pleanála (ABP) under the provisions of the Strategic Infrastructure Development (SID) process. A request has been submitted to ABP to enter into pre-application consultation to confirm this.

Coillte has engaged a team of technical specialists who are in the process of scoping environmental assessments for the proposed development. We therefore invite you to submit any relevant information you may hold and/or highlight any issues that you feel should be considered and/or addressed by the project team. Your views/comments on the proposed development should be submitted by email, letter or telephone to the contact name below, no later than the 1st of April 2020.

It is proposed to hold Public Information Events on the project in the coming months and we encourage you to attend and meet the project team. Please let us know if you would like to attend the Public Information Event(s) and we can contact you when a date for same has been confirmed.

Directors: Michael Shelly (Chairman) R.F. Tobin (Managing Director) E. Connaughton (Company Secretary)
B.J. Downes D. Grehan M. McDonnell C. McGovern
M.F. Garrick J.P. Kelly

Associate Directors B. Carroll M. Casey P. Cloonan P. Cunningham B. Gallagher
B. Heaney C. Kelly A. Mulligan S. Tinnelly

A project website has been set up to provide information to the public about the proposed development and will include information on the Public Information Events as and when they are confirmed. This project website can be accessed here – www.castlebannywindfarm.ie.

Please find enclosed copy of the Environmental Impact Assessment (EIA) Scoping Report including Figure 1 - Regional Site Location Map and Figure 2 - Indicative Turbine Layout and Grid Connection Corridor Map.

We look forward to hearing from you.

Kind Regards,



Robert Hunt

Senior Project Manager (TOBIN Consulting Engineers)

For and on behalf of Coillte Cuideachta Ghníomhaíochta Ainmnithe



Telephone: (01) 8030 401

Address: TOBIN Consulting Engineers
Block 10-4,
Blanchardstown Corporate Park,
Dublin 15.
D15 X98N

Encl:

1. EIA Scoping Report (including Regional Site Location Map and Turbine Layout and Grid Connection Corridor Map)





Tionól Réigiúnach an Deiscirt
Southern Regional Assembly

Tel/Tel: +353 (0)51 860700
R-phost/Email: info@southernassembly.ie

www.southernassembly.ie

Tobin Consulting Engineers
Block 10-4Blancardtown Corporate Park
Dublin 15
D15 X98N

21/02/2020

Your ref: 10730-I-003-i

A Chara,

I acknowledge receipt of your correspondence dated 19th February 2020 which has been referred to the Regional Planning Division.

File Ref: 20/GD003

Le dea-ghuí,

Ailice Byrne Kelly

Clerical Officer

Corporate & Planning

Southern Regional Assembly

TOBIN CONSULTING ENGINEERS	
PROJECT NO:	
FILE REF:	
Date Received	24 FEB 2020
PASS TO	
	DATE



Irish Aviation Authority
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Dublin 2, D02 T449,
Ireland

Údarás Eitlíochta na hÉireann
Foirgneamh na hAmanna
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26th February 2020

Mr. Robert Hunt,
Tobin Consulting Engineers
Block 10-4 Blanchardstown
Corporate Park
Dublin 15

TOBIN CONSULTING ENGINEERS	
PROJECT NO:	
FILE REF:	
Date Received	28 FEB 2020
PASS TO:	
DATE	

RH

Development: *Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte) and ART Generation propose to develop the Castlebanny Wind Farm in south central Kilkenny in the townlands of Castlebanny, Baunskeha, Derrynahinch, Kiltorcan, Castlecosker, Coolroebeag, Kilvinoge, Cappagh, Coolnahau, Mullennakill, Ballytarsna, Glenpipe and Derrylacka at this point, the proposed development consists of a wind farm with approximately 21 no. turbines, an estimated output capacity of c. 110 MW and a maximum turbine blade tip height of 185m. The development will also include connection of the wind farm to the electrical grid network, on-site substation, electrical and telecommunication infrastructure, access roads and temporary construction compound. It should be noted that these project elements are provisional and are subject to review as the project design, environmental studies and consultation works progress. The overall site measures c. 1600 hectares (ha) and is predominantly covered in active Coniferous forestry plantation. Approximately 1200 ha are in Coillte's ownership whilst the remaining 400 ha comprise third-party owned areas of agricultural grassland, arable crops and commercial forest. There is an extensive network of existing access roads across the site to facilitate the ongoing forestry operations as well as local access to farmlands. The South Leinster Way walking/hiking trail, running from Kildavin in Co. Carlow to Carrick-on-Suir in Co. Tipperary, crosses the southern portion of the site at Castlebanny, Co. Kilkenny. Ref: 10730L003I*

Dear Mr. Hunt,

Thank you for your letter and associated attachments. The Authority notes the proposal to develop a wind farm at Castlebanny, Co. Kilkenny.

As a prescribed body under the Planning and Development Regulations, the Authority will await formal notification of the application subject to An Bord Pleanála confirming the status of the application as Strategic Infrastructure Development, prior to furnishing formal observations.

However, as previously advised to Tobin Consulting Engineers and based on the information provided to the Authority by email in August 2019 and an advised blade tip height of 170ms above ground level, the Authority will not likely have any specific requirements in relation to the development. The Authority would however encourage the developer to engage with the Air Corps / Department of Defence as part of this further scoping exercise to ascertain their views.

It is likely that, subject to no further significant alteration to the development, that during the formal planning process, the Authority will furnish the following 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 wind farm development,

Bord Stiúirthóirí/Board of Directors
Michael McGrail (Cathaoirteach/Chairperson),
Peter Kearney (Príomhfhéidhmeannach/Chief Executive)
Cian Blackwell, Marie Bradley, Eime Donnelly,
Gerry Lumsden, Joan McGrath, Eimer O'Rourke

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

Registered Office:
The Times Building, 11-12 D'Olier Street
Dublin 2, D02 T449, Ireland
Registered No. 211082. Registered in Ireland
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QUALITY
ISO 9001:2015
NSAI Certified

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

<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 a minimum of 30 days prior notification of their erection.’

Yours sincerely



Deirdre Forrest
Corporate Affairs

Mr. Robert Hunt
Senior Project Manager
TOBIN Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15
D15 X98N

TOBIN CONSULTING ENGINEERS	
PROJECT NO:	
FILE REF:	
Date Received	11 MAR 2020
PASS TO	
<i>SCM/AK</i>	

Dáta | Date
9 March 2020

Ár dTag | Our Ref.
TII20-108984

Bhur dTag | Your Ref.

Re: Proposed Development of Castlebanny Wind Farm, Castlebanny, Co. Kilkenny

Dear Mr. Hunt,

Transport Infrastructure Ireland (TII) acknowledges receipt of your EIAR Scoping request in respect of the above proposed project, received by post 21 February 2020.

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

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 application referred.

The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidance as outlined in the 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 notes that the consultation documentation identifies a Wind Farm area located approximately 10km northeast of Mullinavat and east of the M9. 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 (2012), the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports, and to provide access between all regions. 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. In relation to the proposed development site, the scheme promoter should note locations of existing and future national road schemes and develop proposals to safeguard proposed road schemes. 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 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.

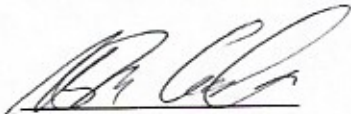
In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential 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. 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.
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 TTA (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 hope that the above comments are of use in your EIAR preparation.

Yours sincerely,



PP Michael McCormack
Senior Land Use Planner



Robert Hunt
Tobin Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15
D15 X98N

12 March 2020

Re: Consultation on proposed windfarm development at Drumnahough Co. Donegal

Your Ref: 10730-L-003-a

Our Ref: 20/46

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 Robert

With reference to your correspondence and EIS scoping report received on 20 February 2020, concerning the proposed development of Castlebanny Windfarm, Castlebanny, Co. Kilkenny, Geological Survey Ireland would like to make the following comments:

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 and susceptibility are prevalent, and we encourage the use of our data when doing so.

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. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).



The audit for Co. Kilkenny was published 2007. The full report is available via the geoheritage page of Geological Survey Ireland website which can be found [here](#). I have checked our records which **show that there are no CGSs in the vicinity of the proposed development.**

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

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.

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

Other Comments

Thank you for sending the scoping report and we look forward to receiving a copy of the environmental impact assessment report in due course for statutory consultation.

In the meantime if you have any questions in relation to our data sets please or if we can be of further assistance, please do not hesitate to contact me, Emily Murray-Farrugia or my colleague, IGH Programme Lead, Dr. Clare Glanville

Yours sincerely

Emily Murray Farrugia
Planning and Geoheritage Programmes

30th March 2020

Robert Hunt
Senior Project Manager
TOBIN Consulting Engineers

REF: 10730-L-003-n

Proposed Development of Castlebanny Wind Farm, Castlebanny, County Kilkenny

Dear Robert,

Thank you for your correspondence in relation to the proposed development of a wind farm at Castlebanny, County Kilkenny.

Having reviewed the maps provided, it appears the height above sea level across the site varies considerably. The proposed location of turbines on the eastern side of the site are at significant heights above sea level, some of which may in combination with the turbine be in excess of 1,400ft above mean sea level.

The proposed location of turbine number 1 which has the potential total height of nearly 1,300 feet is approximately 3 nautical miles from the north west edge of the Waterford Airport control zone, and 5 nautical miles from the instrument approach flight procedures for the prevailing runway 21.

The Airport is concerned that wind turbines at such heights may have an impact on aircraft operations at Waterford Airport.

An aeronautical study would be necessary covering as a minimum an assessment of the safety impact on the airport instrument approach flight procedures, the mandatory aerodrome safety surfaces, and any effects on the safety calibration flights ability to conduct the required flight checking programme for the navigational aids and instrument landing systems at Waterford Airport.

Please feel free to get in contact re the above.

Kind Regards,

Aidan Power - Airport Manager

Subject: FW: Proposed Windfarm Developments-Kildare & Kilkenny
Attachments: Fáilte Ireland EIAR Guidelines.pdf

From: Yvonne Jackson
Sent: Monday 30 March 2020 17:06
To: Robert Hunt
Subject: Proposed Windfarm Developments-Kildare & Kilkenny

Hello Robert,

Thank you for the notifications regarding the scoping environmental proposed assessments for the following proposed developments; Ummeras Wind Farm, Co. Kildare and Castlebanny Windfarm, Co Kilkenny.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIS, which we recommend should be taken into account in preparing the EIAR. 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.

Just for you information, Fáilte Ireland have a dedicated e-mail address for planning information, applications, documentation etc. So, for all future planning related information please send by e-mail to

This will ensure the information/notifications will get to the Environmental & Planning Unit Team and reviewed in a timely manner.

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 | www.failteireland.ie

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Fáilte Ireland
National Tourism Development Authority

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



An tÚdarás Náisiúnta Forbartha Turasóireachta
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Baile Átha Cliath 1
D01 WR86
Éire

National Tourism Development Authority
Áras Fáilte, 88 - 95 Amiens Street
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Email info@failteireland.ie
www.failteireland.ie

Contents

1. Introduction	1
2. Background to this Document.....	1
3. Legislation and Statutory Guidance	2
4. Assessing Tourism	4
5. Guiding Principles of EIAR	5
6. Consideration of Competency and Qualifications	5
7. EIAR Requirements.....	5
Population and Human Health	7
Biodiversity	7
Land, Soils and Geology	7
Water	8
Air Quality and Climate	8
Noise and Vibration.....	8
Material Assets; Traffic and Transport.....	8
Cultural Heritage	8
Archaeology	8
Material Assets; Waste Management.....	8
Material Assets	8
Landscape	8
8. Sources of information on Tourism.....	9
Information available online.....	9

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.

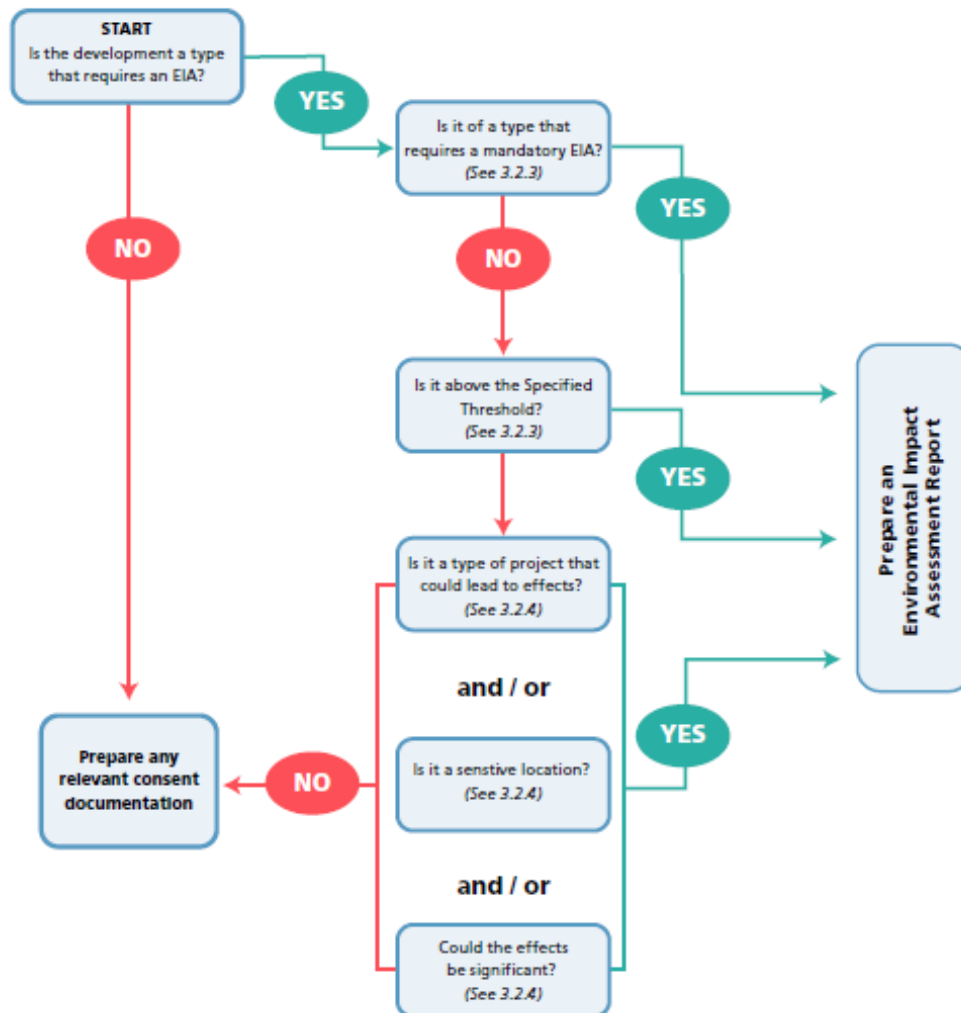
Screening

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.



Your Ref: 10730-L-003-b
Our Ref: **G pre000402020**
(Please quote in all related correspondence)

22 April 2020

Robert Hunt
Senior Project Manager
Tobin Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15
D15 X98N

Via email:

Re: Pre-planning consultation regarding EIA Scoping Report for Proposed Development of Castlebanny Wind Farm, Castlebanny, County Kilkenny

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

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

Archaeology

The Department notes in Section 15 (pages 57-59) of the Environmental Impact Assessment (EIA) Scoping Report that Moore Group Archaeological Consultants have been engaged to carry out the Cultural Heritage and Archaeological Impact Assessment of the proposed development site as part of the EIA. In this regard this Department awaits the submission of this Assessment before commenting further.

Please be advised that it is the published policy of this Department that large-scale developments be subject to archaeological monitoring during the course of groundworks.

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, in her role as statutory consultee under the Planning and Development Act, 2000, as amended.



You are requested to send further communications to this Department's Development Applications Unit (DAU) at (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager
Development Applications Unit (DAU)
Department of Culture, Heritage and the Gaeltacht
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

A handwritten signature in cursive script, appearing to read 'Sinéad O'Brien', is written above a horizontal line.

Sinéad O' Brien
Development Applications Unit

TOBIN Consulting Engineers
Block 10-4,
Blanchardstown Corporate Park,
Dublin 15.
D15 X98N



**Iascach Intíre Éireann
Inland Fisheries Ireland**

21.02.2020

Re. Consultation Request for Proposed Development of Castlebanny Wind Farm, Castlebanny, Co. Kilkenny

Dear Robert,

Thank you for your email dated February 20th regarding a request for consultation on the proposed Castlebanny Windfarm which was forwarded to me for reply.

Please find below our initial concerns and recommendations in relation to this development. Our main concerns in relation to this development will be the protection of the aquatic resource and associated riparian habitat. In particular the protection of streams such as the Mullenhakill that cross the proposed site and which feed into the Arrigle river, part of the River Barrow and River Nore SAC. The consultation paper mentions a potential crossing of the Arrigle for the grid connection. IFI would like to see a detailed design and works methodology for this crossing.

The comments below are generic by necessity and reflect our general concerns in relation to Windfarm developments. Additional concerns may be raised when the final EIAR and planning application is available.

1. All watercourses that will receive drainage from the construction sites of the turbines or the access roads must be assessed in terms of aquatic biodiversity with particular emphasis on fish, the food of fish, spawning grounds and fish habitat in general. In this regard changes to river morphology should be avoided.
2. The aquatic habitat and physical nature of any watercourse affected by the development must be fully described in detail. This includes areas of open water, pool riffle glide sequences, density and types of aquatic vegetation, description of riparian zones to depth of at least 10 metres on either bank etc. The extent of the surveys should be sufficiently long enough so as to be representative of the habitat contained in that watercourse. There should be a particular focus on sections upstream and downstream of any point where an impact on the watercourse is likely to arise. It may be appropriate to survey a tributary stream and the larger, more important streams it joins, and assess the effect the discharge might further have on biodiversity and fisheries in the larger streams. Surveys of un-impacted (control) streams should also be included in the Environmental Impact Assessment.
3. Electrofishing surveys will be required for all waters. Quantitative data in relation to all fish species should be compiled. The presence of salmonid species, crayfish and lamprey species will be of particular concern.



In undertaking the electrofishing survey only experienced personnel should be employed. Appropriate permits for electrofishing must be obtained from the Department of Communications, Energy and Natural Resources. Authorised personnel must ensure that they comply with all the conditions contained in the permit.

4. We are concerned about soils, their structure and types around all the turbines, turbine pads, associated access roads and site development. In particular we have concerns about the stability of the soils and the impact that works on both the turbines and access roads may have either directly or by vibration on the stability of the soils. IFI are concerned where it is proposed to construct wind turbines on peat soils especially if these peat soils are located on upland areas. Extra caution will be required to prevent deleterious discharges to waters.
5. IFI strongly recommends that specialist personnel are employed to assess soil strength and suitability of the ground at each site and along any proposed access road. This is particularly important in relation to peat soils. From our experiences we will have serious difficulties with developments on peat soils where there is excessive slope and or where the peat depth exceeds one metre. Excessive slopes will be an issue with all wind farm proposals regardless of soil type. The potential for soil movement and landslides should be assessed fully within the EIS.
6. Particular attention should be paid to the hydrology of any site where excavations, including excavations for road construction are being undertaken. It is important that natural flow paths are not interrupted or diverted in such a manner as to give rise to erosion or instability of soils caused by an alteration in water movement either above or below ground.
7. Attention should be paid to drainage during both the construction phase and the operational phase. This includes waters being pumped from foundations or other excavations. It is particularly important during the construction phase that sufficient retention time in any settlement pond is available to ensure no deleterious matter is discharged to waters. We strongly recommend that settlement ponds are maintained, where appropriate, during the operational phase to allow for the adequate settlement of suspended solids and sediments and prevent any deleterious matter from discharging. In constructing and designing silt traps particular attention should be paid to rainfall levels and intensity. The silt traps should be designed to minimise the movement of silt during intense precipitation events where the trap may become hydraulically overloaded. It is essential that they are located with good access to facilitate monitoring sampling and maintenance. A license to discharge to waters may be required from the local authority.
8. We have concerns about the construction of roads as these will tend to provide preferential flow paths for surface waters. Considerable attention must be paid to the interception of surface water flows. Our concerns in relation to deleterious matter have been referred to above, but we also have concerns in relation to the flow patterns and to ensuring that normal flows are maintained both during and after construction.



Situations can arise where water transportation is significantly increased in certain watercourses thereby putting additional pressures on watercourses and interfering with the sustained flow of water particularly during dry weather. This should be avoided.

9. Consideration must be given to the disposal of waste materials such that they will not give rise to discharges to waters. In terms of risk, the placing of soils on watercourse-adjacent ground should not be permitted unless the area has been the subject of a risk assessment. This is of particular concern where peat soils are encountered. Furthermore drainage from disturbed and stockpiled soils will have to be considered in advance. It may be necessary to carry out soil stockpiling operations in confined areas only and to ensure vegetation/covering of the soils to prevent wash-out.
10. Details in relation to site offices and the services necessary for the site offices should form part of the EIA. In addition, details relating to operations during the construction phase to contain pollutants should also be considered. It should be noted that cement leachate, hydrocarbon oils and other toxic poisonous materials will require full containment and should not be permitted to discharge to any waters. Please note that physical pollution of watercourses in terms of dumping of unsuitable gravel material or other construction debris in or stockpiling such materials near watercourses is not acceptable as this will interfere with the aquatic habitat.
11. The use of sedimentary rocks, such as shale, in road construction should be avoided. This type of material has poor tensile strength and is liable to be crushed by heavy vehicles thereby releasing fine sediment materials into the drainage system which are difficult to precipitate and may give rise to water pollution. We recommend that specialist expertise should advise on the type of material required for road construction bearing in mind the pressures that will arise during the construction phase and the necessity to avoid pollution due to fines washing out into the roadside drainage.
12. In relation to watercourse crossings please be advised that IFI will require to be consulted well in advance in relation to all crossings of any watercourse or the use of any temporary diversions. We strongly recommend that these crossings should be kept to a minimum. We will also require that any instream structures or bridge crossings are approved by the IFI. In designing crossings the length, slope and width of any instream structure will be important. Clear span bridges are the preferred option for all crossings especially in upland areas.
13. Please also note that any instream works or other works which may impact directly on a watercourse should only be carried out during the open season which is from 1st July to 30th of September in each year (so as to avoid impacting on the aquatic habitat during the spawning season.) It would be important that appropriate scheduling of works is allowed for.
14. The EIAR should indicate proposals to monitor the impact on watercourses within the site. In the event that environmental damage to the aquatic habitat and associated riparian zone is caused, the EIAR should indicate the steps that may be taken to rectify any damage to the aquatic habitat including liaison with the appropriate authorities.



**Iascach Intíre Éireann
Inland Fisheries Ireland**

15. In relation to wind farm structures and infrastructure it is important that a sufficient bank side riparian zone is maintained to absorb and attenuate overland flows. In deciding the extent of this riparian zone the following factors would be important:

- Type of soil and its depth and strength especially if the development is on an upland peat bog area.
- Stock piling or spreading of spoil on unstable soils especially if the soil is peat with a depth greater than 1 meter thick. (Geotec. survey and assessment at every stage of operation is essential)
- Degree or extent of the slope.
- Variations in the topography that will give rise to point flows (keep flow as diffuse as possible).
- Extent and nature of catchment above the area of operation. In particular meticulous care should be paid to avoid interfering with the catchment and altering the direction of flow, perhaps to another catchment.
- The importance of the watercourse and downstream waters in fisheries and biodiversity terms.
- The extent and proven efficacy of water treatment in relation to the structure.

The discharge of polluting or deleterious matter to any watercourse except under and in accordance with a licence may be an offence under the Fisheries Acts and/or under the Water Pollution Acts.

Should works be approved a finalised CEMP must be agreed with Inland Fisheries Ireland before works commence.

Should you require any further information or clarification from IFI, please do not hesitate to contact me.

Yours sincerely,

Jane Gilleran

.....

Jane Gilleran
Fisheries Environmental Officer
Inland Fisheries Ireland - Clonmel



An Roinn Cosanta
Department of Defence

Tobin Consulting Engineers
Block 10-4
Blanchardstown Corporate Park
Dublin 15 DX15 X98N
FAO: Robert Hunt

12 March 2020

Re: Pre-Application Scoping Request : Proposed Castlebanny Wind Farm, Co. Kilkenny

Dear Robert,

I write with regard to the above mentioned pre planning request and your letter to this office on the 19th February 2020.

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

1. The following routes are identified as critical low level routes in support of Air Corps operational requirements and the Air Corps is opposed to the erection of windfarms or tall structures within 3NM of the route centerline which could affect Air Corps' ability to access regional areas.

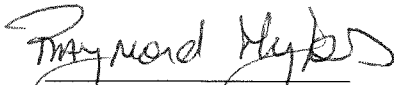
1. N/M1
2. N/M2
3. N/M3
4. N/M4
5. N/M6
6. N/M7
7. N/M8
8. N/M9
9. N/M11
10. N25
11. N17 between Sligo and Knock
12. N15/N13 between Sligo and Letterkenny
13. N14 from Lifford to Letterkenny and R245 and R247 from Letterkenny to Fanad Head.

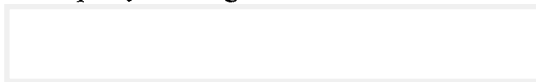
Applications or proposals for structures in these areas of a height greater than 45m above ground level at the site of the object must be referred to Irish Air Corps for assessment of potential impact on flight operations.

2. 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



From: Sabine Browne
Sent: Monday 24 February 2020 10:52
To: Robert Hunt
Subject: Ref: 10730-L-003K

Good morning,

Waterways Ireland is the North/South Implementation Body for the inland navigable waterway systems of Ireland and was established under the British-Irish Agreement, 1999. The statutory remit of Waterways Ireland is to manage, maintain, develop and restore the inland navigable waterways, principally for recreational purposes.

The inland waterways under our remit are: the Grand Canal, the Royal Canal, the Barrow Navigation (Closest to the project – over 15 km away), the Shannon Navigation, the Shannon Erne Waterway, the Erne System and the Lower Bann Navigation.

Waterways Ireland has no comment in relation to the Castleblanny Wind Farm EIA Scoping Report as the project is outside its jurisdiction.

Kind regards,

Sabine Browne
Clerical Officer - Environment & Heritage

Waterways Ireland Western Regional Office
Dock Road, Drewsborough,
Scarriff, Co. Clare
V94 H7N1

From: Planning
Sent: Friday 7 February 2020 16:55
To: Robert Hunt
Cc: qcsofficer
Subject: RE: Consultation Re: Wind Farm Planning Application

Hi Robert,

I refer to your email on wind energy planning application guidance.

The role of the Minister in relation to the planning system is mainly to provide and update the legislative and policy guidance framework. The legislative framework comprises the Planning and Development Act 2000, as amended, and the Planning and Development Regulations, 2001, as amended.

The Department is currently undertaking a focused review of the 2006 Wind Energy Development Guidelines in line with the “preferred draft approach” which was announced in June 2017 by the then Minister for Housing, Planning and Local Government, in conjunction with the then Minister for Communications, Climate Action and the Environment. The review is addressing a number of key aspects including sound or noise, visual amenity setback distances, shadow flicker, community obligation, community dividend and grid connections. As part of the SEA process for the review, the Department launched a ten week public consultation on the draft revised Wind Energy Development Guidelines on 12 December 2019. Full details of the consultation are available on the Department's website at the following link: <https://www.housing.gov.ie/guidelines/wind-energy/public-consultation-revised-wind-energy-development-guidelines>.

When finalised, the revised Guidelines will be issued under section 28 of the Planning and Development Act 2000, as amended. Planning authorities and, where applicable, An Bord Pleanála, must have regard to guidelines issued under section 28 in the performance of their functions generally under the Planning Acts. In the meantime, the current 2006 Wind Energy Development Guidelines remain in force.

Under section 30 of the Planning and Development Act, 2000 the Minister is specifically precluded from exercising any power or control in relation to any particular case, including an planning application, with which a planning authority or An Bord Pleanála is or may be concerned. As a consequence of sections 30, the Minister may not comment in relation to any planning application.

Kind regards,

Annette Nash

Planning Policy

An Roinn Tithíochta, Pleanála agus Rialtais Áitiúil
Department of Housing, Planning and Local Government

Teach an Chustaim, Baile Átha Cliath 1, D01 W6X0
Custom House, Dublin 1, D01 W6X0

T +353 (0)1 888 22237

www.tithiocht.gov.ie www.housing.gov.ie

Disclaimer

Please be advised that the Department cannot advise on the interpretation of planning legislation since the relevant planning authority and in certain cases, An Bord Pleanála, are the appropriate bodies to give planning advice to the public. Under section 30 of the Planning and Development Act 2000 (as amended), the Minister is precluded from exercising any power or control in relation to any particular case with which a planning authority or An Bord Pleanála, is or may be concerned. The content of this email does not constitute an interpretation of the legislation, legal advice or planning advice. Advice on planning matters including legislation should be sought from the relevant planning authority, a planning consultant or a solicitor.

From: qcsofficer
Sent: Friday 7 February 2020 14:48
To: Planning
Subject: FW: Consultation Re: Wind Farm Planning Application

Hi

Can you respond directly to this correspondence below please, if possible within 15 days?

Many thanks.

Kind regards

Róisín

Róisín Heuston
QCS Office

An Roinn Tithíochta, Pleanála agus Rialtais Áitiúil
Department of Housing, Planning and Local Government

Teach an Chustaim, Baile Átha Cliath 1. D01 W6X0
Custom House, Custom House Quay, Dublin D01 W6X0

T (+353) 1 8882741
www.housing.gov.ie

From: Robert Hunt
Sent: 07 February 2020 14:27
To: qcsofficer
Subject: Consultation Re: Wind Farm Planning Application

Hi,

TOBIN are preparing a planning application for a wind farm development on behalf of Coillte. As part of this process, we would like to consult with this Department on the project to obtain your views.

Can you advise on the contact name and address that the relevant information should be sent to, or should I use this email address?

Regards,

Robert

Robert Hunt BEng (Hons), MSc
Chartered Waste Manager
Senior Project Manager

TOBIN Consulting Engineers
Telephone: +353 1 8030 401
Email:
Website: <http://www.tobin.ie>



- 2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)*
- 2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year*
- 2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation*
- 2017 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Innovation)*
- 2017 KPMG Property Industry Excellence Awards Winner: Community Benefit Project of the Year*

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

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This footnote also confirms that this email message has been swept by anti-virus software for the presence of computer viruses.

From: CorporateSupport.Unit
Sent: Friday 7 February 2020 15:20
To: Robert Hunt
Cc: CorporateSupport.Unit
Subject: RE: Consultation Re: Wind Farm Planning Application

Dear Mr Hunt,

You may use the email address _____ and include links to a website if the relevant documents are already published online. If you wish you may post the hard copies to:

Corporate Support Unit,
Department of Communications, Climate Action and Environment,
Elm House,
Earlsvale Road,
Cavan,
Co.Cavan
H12 A8H7

The preference here would be for soft copies if possible as Corporate Support Unit would be circulating the information to three or four appropriate areas in the Department.

Yours sincerely,
Enda Brady,

Enda Brady, Clerical Officer
Finance and Corporate Support Division

Roinn Cumarsáide, Gníomhaithe ar son na hAeráide & Comhshaoil
Department of Communications, Climate Action & Environment
Teach Leamháin, Bóthar Ghleann an Iarla, An Cabhán, H12 A8H7
Elm House, Earlsvale Road, Cavan, H12 A8H7

T +353 (0)1 6782308

www.dccae.gov.ie

From: Robert Hunt
Sent: 07 February 2020 14:02
To: CorporateSupport.Unit
Subject: Consultation Re: Wind Farm Planning Application

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.

Hi,
TOBIN are preparing a planning application for a wind farm development on behalf of Coillte. As part of this process, we would like to consult with this Department on the project to obtain your views. Can you advise on the contact name and address that the relevant information should be sent to, or should I use this email address?

Regards,

Robert

Robert Hunt BEng (Hons), MSc
Chartered Waste Manager
Senior Project Manager
TOBIN Consulting Engineers
Telephone: +353 1 8030 401

Email:

Website: <http://www.tobin.ie>

TOBIN
CONSULTING ENGINEERS

2019 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Structures)

2018 Engineers Ireland Excellence Awards Winner: Engineering Project of the Year

2018 Engineers Ireland Excellence Awards Winner: Heritage and Conservation

2017 Association of Consulting Engineers of Ireland Awards Winner: Design Excellence (Innovation)

2017 KPMG Property Industry Excellence Awards Winner: Community Benefit Project of the Year

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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.



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Castlebar
Co Mayo
F23 Y427
Tel: +353 (0)94 9021401
Email: info@tobin.ie

Our Ref: 10730

06th October 2020

ABP Ref: 306229-19

The Secretary
An Bord Pleanála
64 Marlborough Street,
Dublin 1.
D01 V902

Re: Formal request to close pre-application consultation and issue Strategic Infrastructure Development (SID) Determination for the proposed Wind Farm at Castlebanny, Co. Kilkenny.

Dear Sir/Madam

I refer to our previous Strategic Infrastructure Development (SID) pre-application consultation meetings in relation to a proposed Wind Farm development at Castlebanny, Co. Kilkenny, on the 28th May & 29th July 2020.

Minutes of Last Meeting

On behalf of our clients, Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte) and ART Generation, we wish to acknowledge receipt of written record of the latest pre-application consultation meetings held in relation to Castlebanny Wind Farm on the 29th July 2020. We have no additional comments to make in relations to the circulated minutes.

Pre-Application Consultation Review

The Board will be aware that the applicants wish to progress an application for the proposed Castlebanny Wind Farm as soon as possible, and that two pre-application consultation meetings have now been held. As advised by the Board in our previous pre-determination meeting, the project team have engaged with National Parks and Wildlife Service (NPWS), and with other prescribed bodies, including the Planning Authority, and interested parties in respect of the content and scope of the Environmental Impact Assessment Report (EIAR).

Directors: Michael Shelly (Chairman) R.F. Tobin (Managing Director) E. Connaughton (Company Secretary)
B.J. Downes D. Grehan M. McDonnell C. McGovern
M.F. Garrick J.P. Kelly

Associate Directors B. Carroll M. Casey P. Cloonan P. Cunningham B. Gallagher
B. Heaney C. Kelly A. Mulligan S. Tinnelly

Formal Request to Close Pre-Application Consultation and Issue SID Determination

As presented in our previous discussions with the Board, the Castlebanny Wind Farm will comprise of 21 no. wind turbines, with an estimated output capacity of c. 115 megawatts (MW) and a maximum turbine blade tip height of up to 185m. The development will also include connection of the wind farm to the overhead electrical grid network via a loop-in 110kV underground cable, on-site substation, electrical and telecommunication infrastructure, access tracks, temporary construction compound, temporary works to allow passage of turbine components along the delivery route, and all other associated infrastructure

In light of the comprehensive studies that have been carried out and discussions that have taken place with the Board on the 28th May & 29th July 2020, and other stakeholders in relation to the project, the applicants now wishes to formally close the pre-application consultation process and, as such, requests that the Board carry out its determination under the provisions of Section 37B(4) of the Planning and Development Act, 2000, as amended.

SID Determination Criteria

In order to be considered as SID, any development must meet the threshold established in the 7th Schedule of the Planning and Development Act, 2000 as amended and also satisfy one of more of the three criteria set out in Section 37A(2).

The relevant threshold established in the 7th Schedule for wind farm developments is '*An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines of having a total power output greater than 50MW*'.

The Castlebanny Wind Farm will exceed the above generating capacity threshold.

In addition to meeting the 7th Schedule threshold, Section 37A(2) of the Act (as amended) provides that the following matters be taken into account in determining whether or not a development shall be regarded as SID:

- a) The development must be a strategic economic or social importance to the State of the Region in which it would be situate;
- b) The development would contribute substantially to the fulfilment of any of the objectives of the National Planning Framework or in any regional spatial and economic strategy in respect of the area or areas in which the development would be situate,
- c) The development would have a significant effect on the area of more than one planning authority.

The consideration of Castlebanny Wind Farm in the context of these criteria has been set out in detail in our previous correspondence, as acknowledged in the circulated minutes, but has also been set out here below:

Item (a) *the development would be of strategic economic or social importance to the State or the region in which it would be situate.*

The Castlebanny Wind Farm, with an output of approximately 115 MW, will constitute a significant addition to Ireland's renewable electricity supply, contributing towards Ireland's target of 8.2 gigawatts (GW) of onshore wind capacity to be added to the national grid by 2030 as set out in the Government's *Climate Action Plan 2019*. The wind farm will become the largest wind farm in the south-east of the country and will serve to provide a sustainable and renewable electricity source for the Region, primarily Kilkenny, Waterford, Wexford, Carlow and Tipperary, in line with National and Regional renewable energy policy.

Due to the scale of the Castlebanny Wind Farm, the development is considered to be of strategic economic and social importance to the Region and the State. The capital investment required for a wind farm of this scale, will represent a significant economic contribution to the region, including the provision of community development funding upon commissioning. The development of the wind farm will include commitments to improvements of local amenities, including the South Leinster Way, as well as financial support for local community projects which will deliver social benefits for the immediate locality and the region.



Item (b) *the development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate.*

The Government's *Project Ireland 2040 - National Planning Framework* sets out the overarching policy and planning framework for the social, economic and cultural development of the country. The Plan covers a wide range of national policy objectives and National Strategic Outcomes (NSO) and in respect of the proposed development, sets out the following key objectives:

- National Policy Objective 54

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.

- National Policy Objective 55

Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.

The Castlebanny Wind Farm is in keeping with the above objectives in terms of developing a sustainable renewable energy resource which can replace fossil fuels and contribute to a reduction in greenhouse gas emissions. Any forestry felling required to support the Castlebanny Wind Farm will be offset by the planting of replacement forestry in accordance with Coillte's Sustainable Forestry Management protocols, such that there will be no net loss in carbon sequestration from the development of the site.

The wind farm is also in keeping with the following objectives set out in the *Regional Spatial & Economic Strategy* (RSES) published by the Southern Regional Assembly:

- RPO 87 Low Carbon - Low Carbon Energy Future: The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport, and agriculture
- RPO 95 – Sustainable Renewable Energy Generation : It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.
- RPO 96 – Integrating Renewable Energy Sources: It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure, and ready to meet increased demand as the regional economy grows.
- Regional Policy Objective 98 - Regional Renewable Energy Strategy : It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.
- Regional Policy Objective 99 - Renewable Wind Energy : It is an objective to support the sustainable development of renewable wind energy (on shore and offshore) at appropriate locations and related grid infrastructure in the Region in compliance with national Wind Energy Guidelines.
- RPO 219 - New Energy Infrastructure : It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.

The proposed development application will be supported by an Environmental Impact Assessment Report (EIAR) and Appropriate Assessment (AA) which will outline how the Castlebanny Wind Farm is in keeping with regional and local development guidelines and appropriate to the proposed site. The wind farm will be designed and assessed in full compliance with the requirements of national Wind Energy Guidelines.



Item (c) *the development would have a significant effect on the area of more than one planning authority.*

The Castlebanny Wind Farm is located entirely within the administrative area of Kilkenny County Council. The county boundary of Waterford is c. 14 km to the south, Tipperary is c. 15km to the west, Wexford is c. 10 km to east and Carlow is c. 13km to the north-east. At this point, it is anticipated that the majority of construction traffic movements and turbine deliveries to the site would be via the M9 Junction 11 at Mullinavat which would limit the likely impacts of traffic movements on the neighbouring Local Authorities. The current proposed grid connection route runs to the east of the site over a distance of c. 2.5 km and would remain within the Kilkenny County Council administrative area.

In a recent SID Determination application (Ref ABP- 303322-18) by Brookfield Renewable Ireland Ltd. and Coillte, for a windfarm of up to 27 wind turbines in Co. Cork, the inspector in her assessment stated that the proposed development, which would connect to the national grid, would serve the economies of and have a significant effect on more than one planning authority having regards to Section 37 (A)(2) (c) of the above Act.

SID Determination Criteria

As the proposed development exceeds the relevant threshold as set out in the 7th Schedule and satisfies all three of the criteria as set out in section 37A(2) of the Planning and Development Act 2000, as amended, it is contended that the Castlebanny Wind Farm does constitute Strategic Infrastructure Development, as such we look forward to the determination of the Board in this regard. Subject to determination by the board that the proposed development constitutes a Strategic Infrastructure Development, we intend to submit one planning application for the entire project under Section 37A of the Planning and Development Act (as amended).

As discussed at our pre-application consultation meetings, we understand that the Board will issue any further direction in terms of notices, procedures, and consultees etc. in writing. We trust the above is in order and request that a determination issue on this case at your earliest convenience.

Yours sincerely,

John Staunton

Dr. John Staunton BSc. PhD.

Senior Project Manager & Environmental Scientist

For and on behalf of TOBIN Consulting Engineers

+353 (0) 91 565211

cc: Kieran O'Malley – Coillte

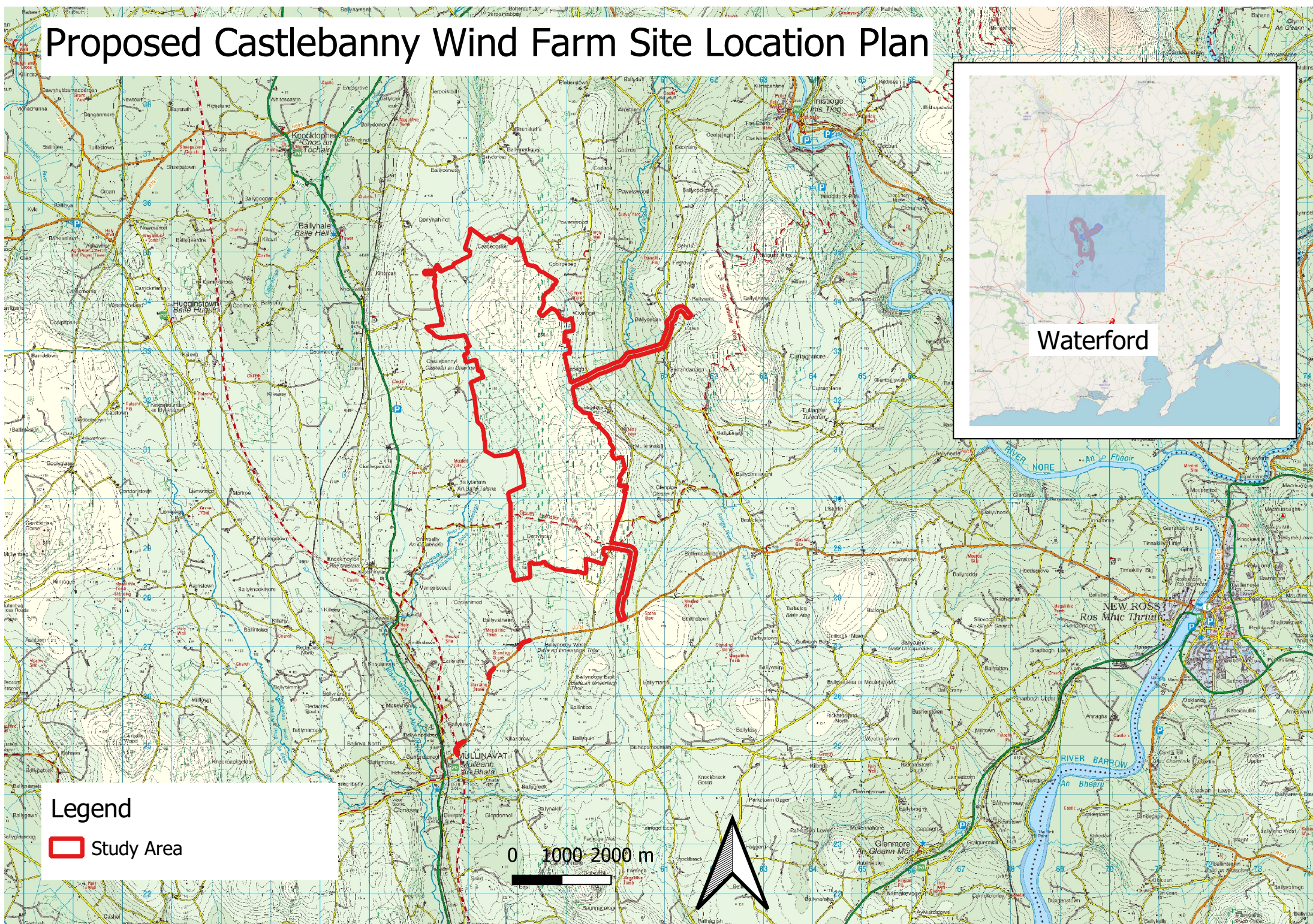
cc: Eamon O Domhnaill – ART Generation

Encl:

1. Site Location Map
2. Site Layout Map



Proposed Castlebanny Wind Farm Site Location Plan

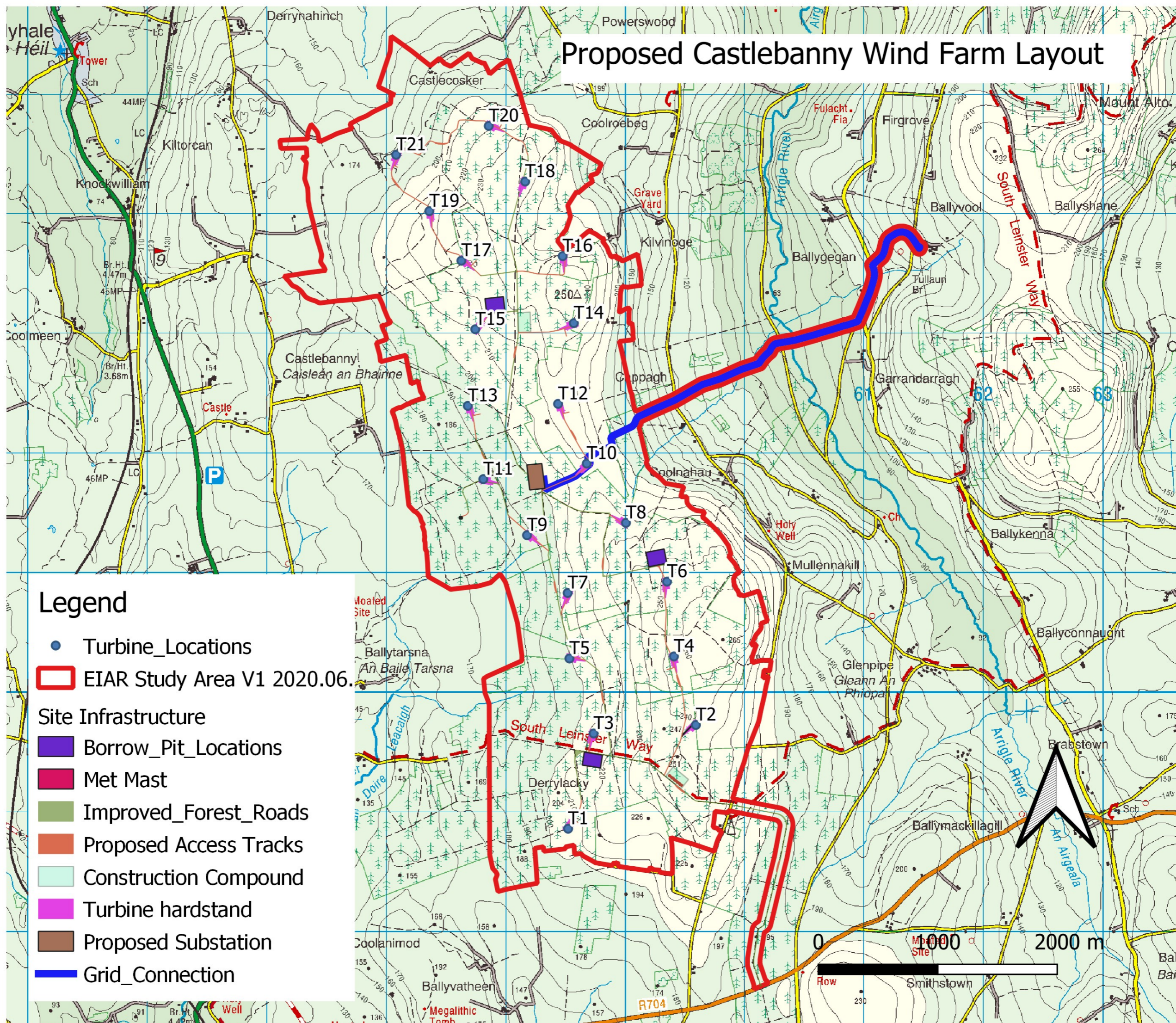


Legend

 Study Area



Proposed Castlebanny Wind Farm Layout



Legend

- Turbine_Locations
- ▭ EIA Study Area V1 2020.06.
- Site Infrastructure**
- ▭ Borrow_Pit_Locations
- ▭ Met Mast
- ▭ Improved_Forest_Roads
- ▭ Proposed Access Tracks
- ▭ Construction Compound
- ▭ Turbine hardstand
- ▭ Proposed Substation
- ▭ Grid_Connection

0 1000 2000 m



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Email: info@tobin.ie

Market Square
Castlebar
Co Mayo
F23 Y427
Tel: +353 (0)94 9021401
Email: info@tobin.ie

Our Ref: 10730-L-003-b

2nd June 2020

Sir/Madam,
Waterford County Council Planning Department
1st Floor, Menapia Building,
The Mall
Waterford, X91 PK15

Re: Proposed Development of Castlebanny Wind Farm, Castlebanny, Co. Kilkenny.

Dear Sir/Madam,

Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte) and ART Generation propose to develop the Castlebanny Wind Farm in south central Kilkenny in the townlands of Castlebanny, Baunskeha, Derrynahinch, Kiltorcan, Castlecoster, Coolroebeag, Kilvinoge, Cappagh, Coolnahau, Mullennakill, Ballytarsna, Glenpipe and Derrylacky.

It is worth noting that no part of the proposed development will be located within county Waterford, and therefore it is not envisaged that any planning application will be submitted to Waterford County Council as part of the proposed development. This consultation is being carried out as a matter of courtesy.

At this point, the proposed development consists of a wind farm with approximately 21 no. turbines, an estimated output capacity of up to 115 MW and a maximum turbine blade tip height of 185m. The development will also include connection of the wind farm to the electrical grid network, on-site substation, electrical and telecommunication infrastructure, access roads and temporary construction compound. It should be noted that these project elements are provisional and are subject to review as the project design, environmental studies and consultation works progress.

The overall site measures c. 1400 hectares (ha) and is predominantly covered in active Coniferous forestry plantation. The majority of this is in Coillte's ownership whilst the remaining areas comprise third-party owned areas of agricultural grassland, arable crops and commercial forest. There is an extensive network of existing access roads across the site to facilitate the ongoing forestry operations as well as local access to farmlands. The South Leinster Way walking/hiking trail, running from Kildavin in Co. Carlow to Carrick-on-Suir in Co. Tipperary, crosses the southern portion of the site.

Due to the scale of the proposed development, it is envisaged that the planning application will be submitted directly to An Bord Pleanála (ABP) under the provisions of the Strategic Infrastructure Development (SID) Act. Consultation has begun with ABP to confirm this.

Coillte has engaged a team of technical specialists who are in the process of scoping environmental assessments for the proposed development. We therefore invite you to submit any relevant information you may hold and/or highlight any issues that you feel should be considered and/or addressed by the project team. Your views/comments on the

Directors: Michael Shelly (Chairman) R.F. Tobin (Managing Director) E. Connaughton (Company Secretary)
B.J. Downes D. Grehan M. McDonnell C. McGovern
M.F. Garrick J.P. Kelly

Associate Directors B. Carroll M. Casey P. Cloonan P. Cunningham B. Gallagher
B. Heaney C. Kelly A. Mulligan S. Tinnelly

proposed development should be submitted by email, letter or telephone to the contact name below, no later than the 19th June 2020.

Given the current restrictions surrounding Covid-19, the proposed Public Information Events for the project will not be held in the traditional sense, however local public engagement is well underway, and Coillte are investigating the possibility of using new and innovative ways to hold alternative public engagement events, most likely virtually.

A project website has been set up to provide information to the public about the proposed development and will include information on the Public Information Events as and when they are confirmed. This project website can be accessed here – www.castlebannywindfarm.ie.

Please find enclosed copy of the Environmental Impact Assessment (EIA) Scoping Report including Figure 1 - Regional Site Location Map and Figure 2 - Indicative Turbine Layout and Grid Connection Corridor Map.

We look forward to hearing from you.

Kind Regards,

John Staunton
Senior Project Manager and Environmental Scientist

For and on behalf of Coillte Cuideachta Ghníomhaíochta Ainmnithe

Email:

Telephone: (01) 8030 401

Address: TOBIN Consulting Engineers
Block 10-4,
Blanchardstown Corporate Park,
Dublin 15.
D15 X98N

Encl:

1. EIA Scoping Report (including Regional Site Location Map and Turbine Layout and Grid Connection Corridor Map)





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Co Mayo
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Email: info@tobin.ie

Our Ref: *10730-L-003-a*

27 March 2020

Planning Manager
Kilkenny County Council Planning Department
County Hall
John Street
Kilkenny, R95 A39T

Re: Proposed Development of Castlebanny Wind Farm, Castlebanny, Co. Kilkenny.

Dear Sir/Madam,

Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte) and ART Generation propose to develop the Castlebanny Wind Farm in south central Kilkenny in the townlands of Castlebanny, Baunskeha, Derrynahinch, Kiltorcan, Castlecoster, Coolroebeag, Kilvinoge, Cappagh, Coolnahau, Mullennakill, Ballytarsna, Glenpipe and Derrylackey.

At this point, the proposed development consists of a wind farm with approximately 21 no. turbines, an estimated output capacity of c. 110 MW and a maximum turbine blade tip height of 185m. The development will also include connection of the wind farm to the electrical grid network, on-site substation, electrical and telecommunication infrastructure, access roads and temporary construction compound. It should be noted that these project elements are provisional and are subject to review as the project design, environmental studies and consultation works progress.

The overall site measures c. 1600 hectares (ha) and is predominantly covered in active Coniferous forestry plantation. Approximately 1200 ha are in Coillte's ownership whilst the remaining 400 ha comprise third-party owned areas of agricultural grassland, arable crops and commercial forest. There is an extensive network of existing access roads across the site to facilitate the ongoing forestry operations as well as local access to farmlands. The South Leinster Way walking/hiking trail, running from Kildavin in Co. Carlow to Carrick-on-Suir in Co. Tipperary, crosses the southern portion of the site.

Due to the scale of the proposed development, it is envisaged that the planning application will be submitted directly to An Bord Pleanála (ABP) under the provisions of the Strategic Infrastructure Development (SID) Act. A request has been submitted to ABP to enter into pre-application consultation to confirm this.

Coillte has engaged a team of technical specialists who are in the process of scoping environmental assessments for the proposed development. We therefore invite you to submit any relevant information you may hold and/or highlight any issues that you feel should be considered and/or addressed by the project team. Your views/comments on the proposed development should be submitted by email, letter or telephone to the contact name below, no later than the 17th April 2020.

Directors: Michael Shelly (Chairman) R.F. Tobin (Managing Director) E. Connaughton (Company Secretary)
B.J. Downes D. Grehan M. McDonnell C. McGovern
M.F. Garrick J.P. Kelly

Associate Directors B. Carroll M. Casey P. Cloonan P. Cunningham B. Gallagher
B. Heaney C. Kelly A. Mulligan S. Tinnelly

It is proposed to hold Public Information Events on the project in the coming months and we encourage you to attend and meet the project team. Please let us know if you would like to attend the Public Information Event(s) and we can contact you when a date for same has been confirmed.

A project website has been set up to provide information to the public about the proposed development and will include information on the Public Information Events as and when they are confirmed. This project website can be accessed here – www.castlebannywindfarm.ie.

Please find enclosed copy of the Environmental Impact Assessment (EIA) Scoping Report including Figure 1 - Regional Site Location Map and Figure 2 - Indicative Turbine Layout and Grid Connection Corridor Map.

We look forward to hearing from you.

Kind Regards,



Alan Kelly

Operations Manager & Senior Planner

For and on behalf of Coillte Cuideachta Ghníomhaíochta Ainmnithe

Email:

Telephone: (01) 8030 401

Address: TOBIN Consulting Engineers
Block 10-4,
Blanchardstown Corporate Park,
Dublin 15.
D15 X98N

Encl:

1. EIA Scoping Report (including Regional Site Location Map and Turbine Layout and Grid Connection Corridor Map)



From: Stan Cullen
Sent: Wednesday 21 October 2020 17:49
To: Laura Gaffney
Subject: RE: 10730 Castlebanny Wind Farm - Traffic Scoping

Laura,
Further to our telecon yesterday, the AADT on the R701 measured within the 60kph zone at Ballynooney in November 2019 was 1356 with 5.5% HGV.
Regards,
Stan

From: Laura Gaffney
Sent: 16 October 2020 15:07
To: ross oshay; Seamus Foley
Cc: Kieran O'Malley ; John Staunton ; Stan Cullen
Subject: RE: 10730 Castlebanny Wind Farm - Traffic Scoping

Ross / Seamus,

I was speaking with Stan Cullen in the South Kilkenny Area Office with regards to the Castlebanny Wind Farm Project. TOBIN will be drafting the Traffic Chapter of the EIAR. Further to our conversation Stan advised that I speak with you to discuss some of the details further and to scope for the traffic impact assessment element of the EIAR.

Please see below, original email issued to Stan outlining the proposed project in relation to roads and traffic.

I will give a call later today / early next week to discuss.

Regards,

Laura.

From: Laura Gaffney
Sent: Thursday 15 October 2020 17:27
To: 'Stan Cullen (Kilkenny County Council (Head Office))'
Cc: 'Kieran O'Malley (Coillte Teoranta (Headquarters))' ; John Staunton

Subject: RE: 10730 Castlebanny Wind Farm - Traffic Scoping

Stan,

I appreciate you taking my call earlier. As suggested, I will contact Ross O'Shay (District Planner) and Seamus Foley (Senior Executive Roads Engineer) tomorrow.

Traffic Impact:

1. Key area of impact to be assessed is the R704

Quarry Summary:

1. Kiltorcan Quarry & Castlegannon Quarry may not be viable options based on current extraction licenses / planning.
2. Roadstone Kilmacow has an extraction license until 2030

3. Kent Quarry has an extraction license until 2023
4. Haul routes to be predominately regional and national routes with higher capacity for these types of vehicles over local roads. Local primary routes will require survey for assessment if proposed.

Turbine Delivery Route:

1. No major concerns on TDR haul route as predominantly on national routes, with use of the R704 to access the site from the motorway.
2. A TDR Assessment has been undertaken outlining 12 no. pinch points.
3. The impact of the TDR on junctions / oversail to detail: impact on drainage (i.e. at temporary hardstanding areas), demountable signage and other associated impacts
4. The TDR will be subject to an Abnormal Load License
5. A Road Opening license may be required for works to accommodate the TDR at the pinch point locations requiring works.

Construction Program:

1. The programme is envisaged to take 2 years
2. The civil works include for upgrade of internal forestry access roads, drainage works, tree felling, substation, compound works, fencing and ancillary civil works.
3. The turbine element of 17HGV is associated with importation of materials for the hardstanding areas. For the concrete pours for the turbine foundations, it is envisaged that these will be undertaken on a single day, with all other works suspended on site.
4. Although borrow pits have been identified on site, we have assumed only the capping material will be available from the borrow pits and all the subgrade materials will be imported.

Traffic Assessment:

1. Details to be discussed with Ross / Seamus.

Kind Regards,

Laura.

From: Laura Gaffney

Sent: Tuesday 13 October 2020 15:37

To: 'Stan Cullen (Kilkenny County Council (Head Office))'

Cc: 'Kieran O'Malley (Coillte Teoranta (Headquarters))' ; John Staunton

Subject: 10730 Castlebanny Wind Farm - Traffic Scoping

Hi Stan,

TOBIN on behalf of Coillte are undertaking the traffic chapter of the EIAR for the Castlebanny Wind Farm, Co. Kilkenny. We are seeking to scope the traffic chapter of the EIAR. A summary has been provided below of the project and the key traffic and road impacts. I left a message with your colleague this afternoon and look forward to discussing the below at your earliest convenience.

Brief Summary

The site is located 6.5km northeast of Mullinavat, Co. Kilkenny. Existing access to the site is available from the Local Road, Glenville. The proposed site access will be via an existing Coillte access on the R704, crossing the local road, Glenville to the site. See attached site layout for discussion purposes only (Google Map Link: <https://goo.gl/maps/V5pnjKgfQaR1FXfr9>)

The proposal is for the construction of 21 no. turbines with use of existing internal forestry roads, upgrade of these internal roads, construction of new internal roads, hardstanding areas, substation and compound construction and associate civils and tree felling. Borrow pits have been identified on site and it is estimated

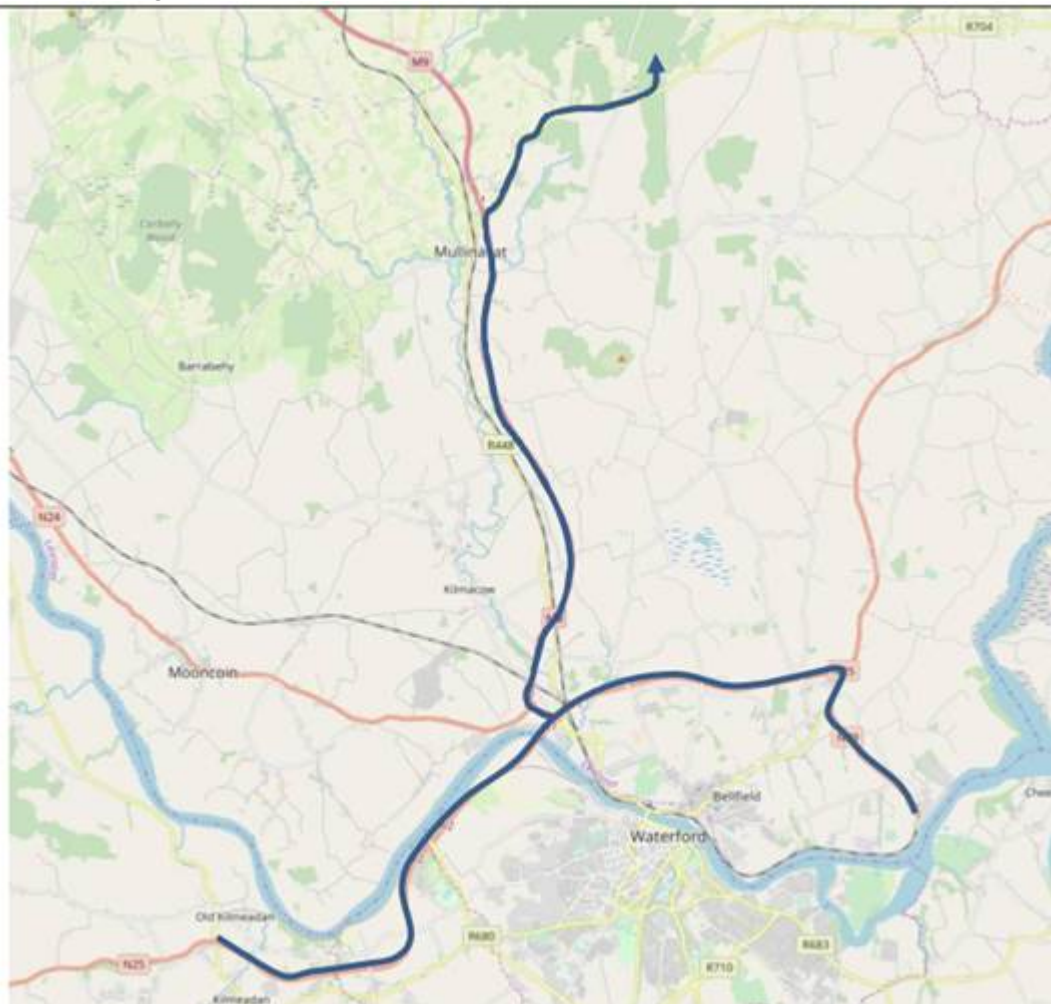
that these will provide all capping materials. All subbase material and concrete are assumed to be sourced from local quarries.

The tip height is estimated at 185m, with a blade length of 75m. The proposed port for delivery of the turbines is Port of Waterford.

The construction phase of the development will have the largest impact on the road / traffic network, due to the volume of materials imported to the site. It is envisaged that the construction programme will take approximately 2 years. The operational phase will have a low impact, with occasional vehicles to the site for maintenance once every few weeks. The decommission phase of the project will have a medium impact.

Turbine Delivery

A Turbine Delivery Route (TDR) Assessment has been undertaken as outlined in the image below. The proposal route is from the Port of Waterford along the N29 to the Slieverue Link, turning left at Luffany Roundabout onto the N25 Waterford Bypass. At the rotary grade separated junction W1, the TDR swept path indicates for the TDR will continue south on the N25 mainline crossing into Co. Waterford to the Carrick Road Roundabout (N25/ R680). At this roundabout junction, the TDR turns back in a northly direction, on the N25 northeast bound lane to the W1 junction and onto the N9 Quarry Link Road. At the Quarry Roundabout, M9 Junction 12, the route continues north on the M9 to Exit 11, Mullinavat. The TDR continues onto the R704 turning to the site 650m east of the local road, Glenville.



Approximately 12 pinch points have been identifies requiring advanced works to make sign posts / lighting columns demountable, temporary relocation of street furniture, hedgerow cutting for oversail and some areas of hardstanding.

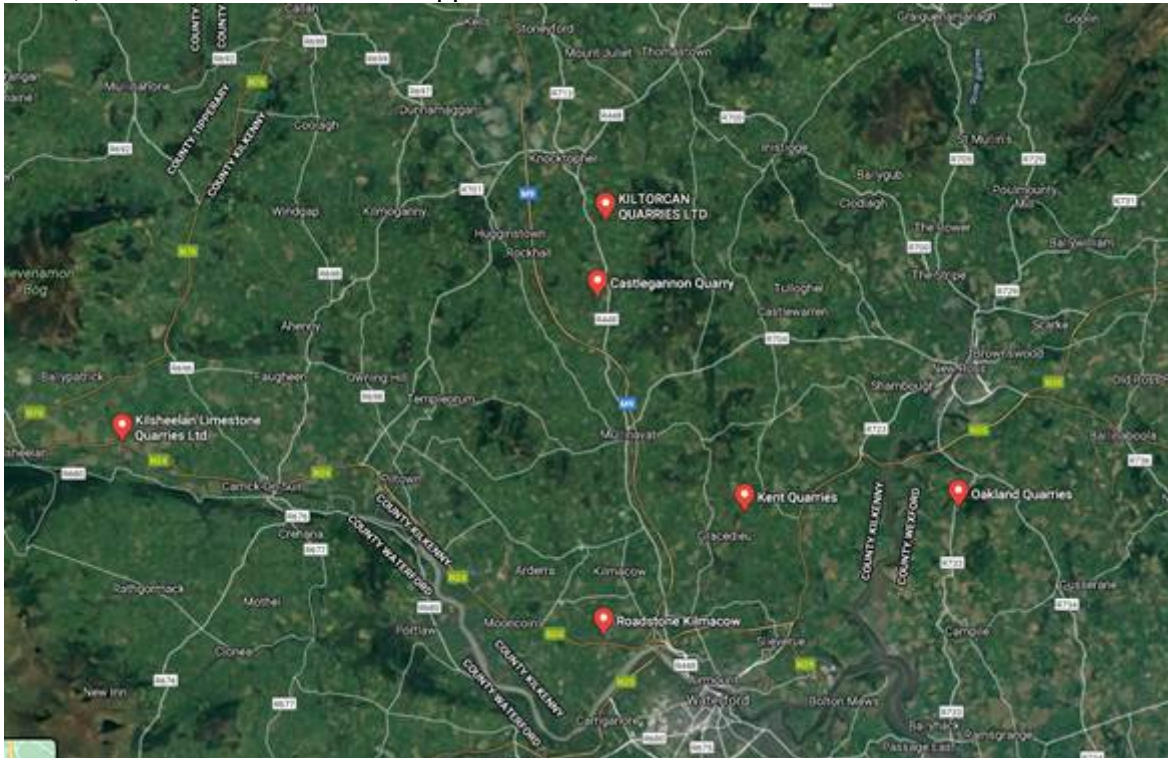
Estimated Traffic Turbine

Abnormal Loads	No. Of Turbines	No. Of Turbines	Parts	Components	To Comp
	Nacelle	21	1	21	18

	Blade	21	3	63
	Tower	21	5	105

Construction Material

The construction traffic with the largest impact is the aggregate for the internal haul routes and hardstanding areas and in particular the concrete pours for the turbine foundations. As previously stated, borrow pits have been identified on the site which are estimated to provide the capping material. The subbase material and concrete are assumed to be sourced locally. The image below indicates various quarries in proximity to the site. It is assumed that the source could potentially be from the R448 to the north or from the N24 / M9 to the R704, this will be determined on appointment of a contractor.



An estimated of the HGV traffic associated with a construction programme of 2 years has been prepared and is attached. The operational hours are assumed to be Mon- Fri 07:00-19:00hrs and Saturday 07:00-14:00hrs. The graph gives an indication of the daily volume of traffic arriving to the site on a day during the associated construction stage (i.e. civil works, electrical, turbine, cabling, commissioning). In the Turbine Programme there are two figures shown:

1. The value of 17HGVs per day is for typical construction activities (i.e. import of materials for hardstanding etc).
2. The 94 HGV is the estimated value of traffic associated with a single concrete pour for the turbine foundation over a 12 hour period.

As a mitigation measure there works will not happen on the same day and hence, the two values provided. It is assumed at peak construction operations that 60 staff will attend the site.

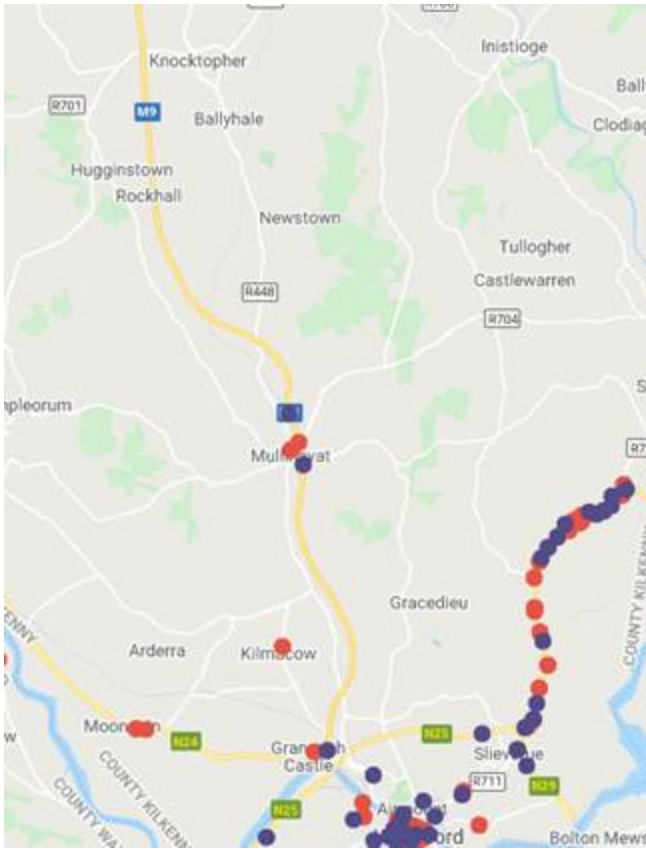
Cabling

The cabling route is indicated on the site overview attached. This indicates that the cable route will be primarily through greenfield, with 3 road crossings of local roads and a section of cable laying within the local road.

Traffic Assessment

As part of the Traffic chapter of the EAIR, we typically undertake a traffic assessment in accordance with the TII Guidelines for Traffic and Transportation Assessments. Due to the current situation, we have been investigating the potential of using historical traffic count data to undertake the assessment on other projects. As evident on the image below, there are no details available for the R704.

Screenshot of the information available from traffic count providers IDASO:



We look forward to discussing the above details with you to scope for the EIAR Traffic Chapter and associated Traffic Management Plan.

Regards,
Laura.

Laura Gaffney CEng, MSc, BEng
Senior Engineer – Building & Infrastructure (Roads & Transportation)

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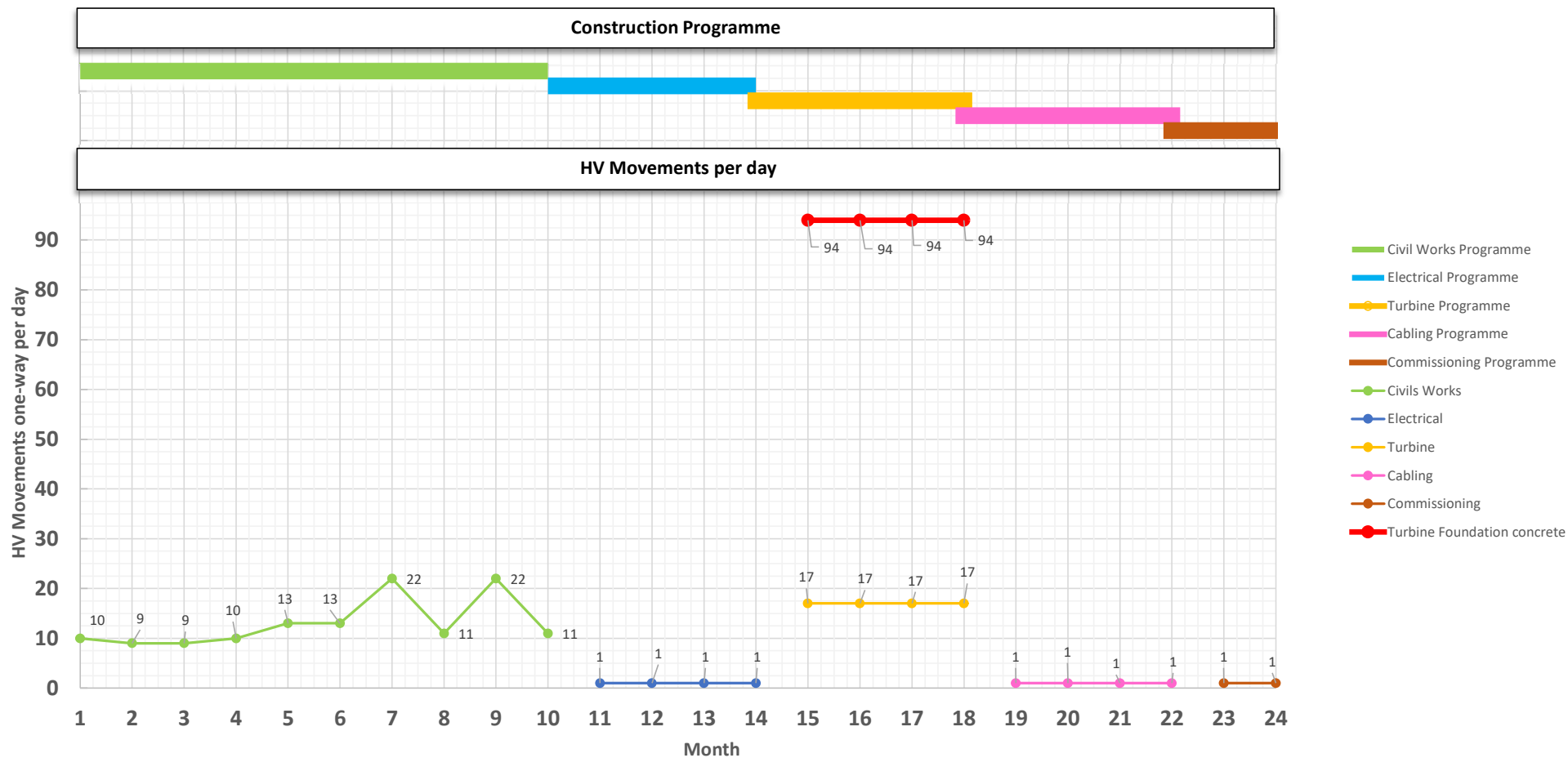


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Construction Traffic Versus Construction Programme
HV one-way movements per day to site



Subject:

FW: 10730 Castlebanny Wind Farm - Traffic Scoping

From: Seamus Foley**Sent:** Friday 16 October 2020 16:55**To:** Laura Gaffney**Cc:** Stan Cullen ; Ross O'Shea ; Harry Shine; Owen Shine**Subject:** RE: 10730 Castlebanny Wind Farm - Traffic Scoping

Also Laura a stage 1/2 RSA which I assume doing anyway. Particularly in relation to the junction with the R704 both for construction and for operation.

Seamus Foley BE, MIEI.

Senior Executive Engineer,

Kilkenny County Council,

Road Design Section,

No 1A Dean Street, Kilkenny.

Tel:

Email:

From: Seamus Foley**Sent:** 16 October 2020 16:44**To:** 'Laura Gaffney'**Cc:** Stan Cullen ; Ross O'Shea Harry Shine; Owen Shine**Subject:** RE: 10730 Castlebanny Wind Farm - Traffic Scoping

Laura,

I am awaiting to discuss with one of my colleagues.

First impressions are the traffic impact issues are going to arise during both construction and potential decommissioning phases only. Assumption is that wind farms generally receive permission for a defined period of time so decommissioning would need to be considered also.

These phases are really where the traffic impact will arise and will be for a discrete defined period of time, noted reference to 2 years. The points you outline below are really looking at these.

I don't see much merit in doing junction analysis for say 5, 10 + year horizons to ensure have capacity.

During operation I am assuming traffic movements will be very low with only maintenance type operations arising. You will need to outline what they might be, expected amounts and impacts. Again I expect them to be minimal.

In terms of traffic volumes doing surveys now is going to be problematic. Traffic flows are close to but still below pre covid levels and if further restrictions arise depending on the timing of surveys could give artificially low results. Judgement call would need to be made in respect of how old the data is and whether consider with addition of growth factors might be better way to estimate volumes.

Regards,

Seamus Foley BE, MIEI.

Senior Executive Engineer,

Kilkenny County Council,

Road Design Section,
No 1A Dean Street, Kilkenny.
Tel: 056-7794306
Email:

From: Laura Gaffney
Sent: 16 October 2020 15:07
To: Seamus Foley; Ross O'Shay
Cc: Kieran O'Malley ; John Staunton ; Stan Cullen

Subject: RE: 10730 Castlebanny Wind Farm - Traffic Scoping

Ross / Seamus,

I was speaking with Stan Cullen in the South Kilkenny Area Office with regards to the Castlebanny Wind Farm Project. TOBIN will be drafting the Traffic Chapter of the EIAR. Further to our conversation Stan advised that I speak with you to discuss some of the details further and to scope for the traffic impact assessment element of the EIAR.

Please see below, original email issued to Stan outlining the proposed project in relation to roads and traffic.

I will give a call later today / early next week to discuss.

Regards,

Laura.