From: Phoebe Duvall <planning@antaisce.org>
Sent: Monday 20 December 2021 10:22

To: Niamh McHugh

**Subject:** Out of Office Re: FAO: Built Environment and Heritage Officer 201732 - Proposed

Knocknamork TDR and Grid Route Connection Scoping

Thank you for your email. The An Taisce planning office is closed until January 6th, and we will respond to your message when we return.

If your message relates to a specific planning application or issue, please provide full details of the site, building or issue of concern (with photos if possible), as well as the relevant local Council reference number if applicable.

We do have to tell you that our resources are very limited and besides referrals from planning authorities, queries from An Taisce members are prioritised. If you wish to become a member please click <a href="here">here</a>. Otherwise, we will reply when we can.

Thank you very much. Merry Christmas and Happy New Year.

--

#### Phoebe Duvall

Planning and Environmental Policy Officer An Taisce - The National Trust for Ireland The Tailors' Hall, Back Lane, Dublin 8, Ireland Phone: 01 454 1786 www.antaisce.org

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From: Sent: To: Cc: Subject:	Phoebe Duvall <planning@antaisce.org> Monday 20 December 2021 16:20 Niamh McHugh Eoin O'Sullivan Re: FAO: Built Environment and Heritage Officer 201732 - Proposed Knocknamork TDR and Grid Route Connection Scoping</planning@antaisce.org>
Hello Niamh,	
Received with thanks.	
All the best, Phoebe	
On Mon, 20 Dec 2021 at 0	03:21, Niamh McHugh < <u>nhmchugh@mkoireland.ie</u> > wrote:
Dear Ms. Duvall/ Mr. Lui	nley,
Route and Turbine Deliv	Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection ery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/uments provide detail on the proposed scope of this development.
	es you may have in relation to the Proposed Development would be welcomed and can be ddress at your earliest convenience.
Nollaig Shona!	
Kind Regards,	
Niamh.	
MKÔ	Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

www.mkoireland.ie





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#### Phoebe Duvall

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From: Roads < Roads@CorkCoCo.ie>
Sent: Tuesday 21 December 2021 10:59

To: Niamh McHugh

**Subject:** FAO Roads Department: 210732 - Informal Scoping Request: Proposed

Knocknamork Turbine Delivery Route and Grid Connection Route

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

Good Morning,

I acknowledge receipt of your email and attached documentation.

This is being reviewed and a response will issue in due course.

Regards,

Elma Buckley Roads Finance & Admin Cork County Council

From: CorporateServices < CorporateServices@CorkCoCo.ie>

**Sent:** Monday 20 December 2021 13:02

To: Roads < Roads@CorkCoCo.ie>

Subject: FW: FAO Roads Department: 210732 - Informal Scoping Request: Proposed Knocknamork Turbine Delivery

**Route and Grid Connection Route** 

From: Niamh McHugh < nhmchugh@mkoireland.ie>

Sent: Monday 20 December 2021 11:13

To: CustomerCare < CustomerCare@CorkCoCo.ie>

Subject: FAO Roads Department: 210732 - Informal Scoping Request: Proposed Knocknamork Turbine Delivery

**Route and Grid Connection Route** 

Dear Sir/ Madam,

## **Informal Scoping Request:**

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

#### **MKO**

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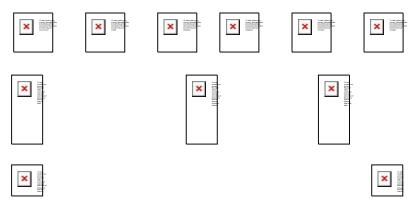




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# www.corkcoco.ie



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From: Housing Manager DAU <Manager.DAU@housing.gov.ie>

Sent: Tuesday 21 December 2021 09:50

To: Niamh McHugh

**Subject:** RE: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection

**Route Scoping** 

PLEASE NOTE: Pre-Planning Applications to the Department is coordinated by Development Applications Unit at manager.dau@housing.gov.ie

Our Ref: G Pre00308/2021 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

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

The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt (plus 2 weeks over Christmas Period). In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.

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

Regards Diarmuid

# **Diarmuid Buttimer**

Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta Department of Housing, Local Government and Heritage Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

Newtown Road, Wexford, County Wexford, Y35 AP90

\_\_\_

<u>Diarmuid.Buttimer@housing.gov.ie</u> Manager.DAU@housing.gov.ie

From: Housing Qcsofficer <qcsofficer@housing.gov.ie>

Sent: Tuesday 21 December 2021 08:12

To: Housing Manager DAU < Manager. DAU@housing.gov.ie>

Subject: FW: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Manager,

Please see the request below for a pre-application consultation plus attached documents in connection with proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry.

Kind regards, Naomi

Naomi Donaldson

Communications

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

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

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

From: Niamh McHugh < <a href="mailto:nhmchugh@mkoireland.ie">nhmchugh@mkoireland.ie</a>>

Sent: Monday 20 December 2021 10:45

To: Housing Qcsofficer < <a href="mailto:qcsofficer@housing.gov.ie">qcsofficer@housing.gov.ie</a>>

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

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Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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# **Eoin O'Sullivan**

From: Housing Manager DAU <Manager.DAU@housing.gov.ie>

**Sent:** 16 March 2022 13:00 **To:** Eoin O'Sullivan

**Subject:** DAU Ref: G Pre00308/2021 RE: 210732 - Proposed Knocknamork Turbine Delivery

Route and Grid Connection Route Scoping

G Pre00308/2021

A Chara,

The Department is not in a position to make specific comment on this particular referral at this time. No inference should be drawn from this that the Department is satisfied or otherwise with the proposed activity. The Department may submit observations/recommendations at a later stage in the process.

Kind Regards Sinéad

\_

Sinéad O' Brien Executive Officer

\_

Aonad na nlarratas ar Fhorbairt Development Applications Unit

Oifigí an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90

Newtown Road, Wexford, County Wexford Y35 AP90

\_

From: Eoin O'Sullivan <eosullivan@mkoireland.ie>

**Sent:** Tuesday 15 March 2022 12:41

To: Housing Manager DAU < Manager. DAU@housing.gov.ie>

Cc: Niamh McHugh < nhmchugh@mkoireland.ie>

Subject: RE: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

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Dear Sir/Madam,

With reference to your email dated the 21<sup>st</sup> December 2021 (attached), can you please provide an update to the scoping request for Knocknamork Grid Connection, at your earliest convenience.

Regards

Eoin



Eoin O'Sullivan MSc. CWEM CEnv Senior Environmental Scientist

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From: Niamh McHugh

**Sent:** 20 December 2021 10:35 **To:** Manager.DAU@ahg.gov.ie

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Sir/Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env)
Graduate Environmental Scientist

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From: Environmental Co-ordination (Inbox) < Environmental Co-

ordination@agriculture.gov.ie>

**Sent:** Friday 14 January 2022 09:22

To: Niamh McHugh

**Subject:** RE: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection

**Route Scoping** 

You don't often get email from environmental\_co-ordination@agriculture.gov.ie. Learn why this is important

#### Hello Niamh

The following are the comments from the Department of Agriculture, Food & the Marine in relation to the proposed development:

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department <u>before</u> trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section**, **Department of Agriculture**, **Food and the Marine**, **Johnstown Castle Estate**, **Co. Wexford**. Email: <u>felling.forestservice@agriculture.gov.ie</u> or Web <u>gov.ie</u> - <u>Tree Felling Licences (www.gov.ie)</u>

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

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

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

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

- The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);
- 2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: <a href="mailto:gov.ie-Felling Licence Applications">gov.ie-Felling Licence Applications</a> (<a href="www.gov.ie">www.gov.ie</a>)
- 3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at: gov.ie Felling Licence Decisions (www.gov.ie)

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
  - 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment

to be undertaken, including the direct and indirect environmental impact of the project;

and

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

# Kind regards

#### **Cathy Hewitt**

**Executive Officer** 

An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh, Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |

An Roinn Talmhaíochta, Bia agus Mara

Department of Agriculture, Food and the Marine

Pailliún A, Páirc Gnó Grattan, Bóthar Átha Cliath, Port Laoise, Co Laoise, R32 K857

Pavilion A, Grattan Business Park, Dublin Road, Portlaoise, Co Laois, R32 K857 T +353 (0)57 868 9915 environmentalco-ordination@agriculture.gov.ie

www.agriculture.gov.ie

From: Niamh McHugh < nhmchugh@mkoireland.ie>

Sent: Monday 20 December 2021 10:33

To: Environmental Co-ordination (Inbox) < Environmental\_Co-ordination@agriculture.gov.ie>

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

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Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env)
Graduate Environmental Scientist **MKO** 

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#### Disclaimer:

Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

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

**From:** CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>

**Sent:** Friday 22 April 2022 08:54

To: Niamh McHugh

**Cc:** CorporateSupport.Unit; Planning Advisory

**Subject:** Reply from DECC re MKO re: 210732 - Proposed Knocknamork Turbine Delivery

Route and Grid Connection Route Scoping

**Attachments:** Knocknamork SD F1 - 2021.12.17 - 210732 - Reduced.pdf; 210732 - Dept of

EnvScoping Letter - 2021.12.17.pdf

#### Good morning Niamh,

Following your notice of 11/04/2022 please see below a reply from Rory Coleman on behalf of Environmental Protection Division (a division of the Department of Environment, Climate and Communications) for the subject below. Please forward an acknowledgment of receipt to <a href="mailto:CorporateSupport.Unit@decc.gov.ie">CorporateSupport.Unit@decc.gov.ie</a> at your earliest convenience.

Regards, Enda Brady,

Corporate Support Unit.

Enda Brady,

Corporate Support Unit,

#### An Roinn Comhshaoil, Aeráide agus Cumarsáide

Department of the Environment, Climate and Communications

Teach Leamháin, Bóthar Ghleann an Iarla, An Cabhán, H12 A8H7

Elm House, Earlsvale Road, Cavan, H12 A8H7

M +35387 623 7714 T +353 (0)1 6782308

CorporateSupport.Unit@decc.gov.ie www.gov.ie/decc

From: Rory Coleman < Rory.Coleman@decc.gov.ie>

Sent: Thursday 21 April 2022 12:15

To: CorporateSupport.Unit < CorporateSupport.Unit@decc.gov.ie>

Subject: FW: MKO re: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Hi

Please note reply on behalf of the Environmental Protection Division.

In respect of waste in the within documentation, we would be obliged if the Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.

Kind regards

Rory

From: Niamh McHugh < <a href="mailto:nhmchugh@mkoireland.ie">nhmchugh@mkoireland.ie</a>>

Sent: Monday 11 April 2022 10:19

To: CorporateSupport.Unit < CorporateSupport.Unit@decc.gov.ie>

Cc: Eoin O'Sullivan < eosullivan@mkoireland.ie >

Subject: FW: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

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Dear Sir/Madam,

I refer to an EIA Scoping Document you received in December as part of the preparation for an Environmental Impact Assessment Report Statement (EIAR) for the proposed Knocknamork Grid connection and Turbine delivery route for the permitted Knocknamork renewable energy development, on the Cork-Kerry county boundary.

MKO are currently conducting an EIAR Scoping exercise for the Proposed grid connection and turbine delivery route.

Any comments in relation to this project would be welcomed.

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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From: Niamh McHugh

Sent: Monday 20 December 2021 10:38

To: CorporateSupport.Unit < CorporateSupport.Unit@decc.gov.ie >

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env)
Graduate Environmental Scientist

#### **MKO**

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



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**From:** CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>

**Sent:** Tuesday 26 April 2022 15:24

To: Niamh McHugh

**Cc:** CorporateSupport.Unit; Planning Advisory

**Subject:** Reply No.2 from DECC re EIS 22/135 - Proposed Knocknamork Turbine Delivery

Route and Grid Connection Route Scoping

Follow Up Flag: Follow up Flag Status: Completed

Good afternoon Niamh,

Please see below a reply from Trish Smullen on behalf of Geological Survey Ireland (a division of the Department of Environment, Climate and Communications) for the subject below.

Regards, Enda Brady, Corporate Support Unit.

Enda Brady,

Corporate Support Unit,

#### An Roinn Comhshaoil, Aeráide agus Cumarsáide

Department of the Environment, Climate and Communications

Teach Leamháin, Bóthar Ghleann an Iarla, An Cabhán, H12 A8H7

Elm House, Earlsvale Road, Cavan, H12 A8H7

M +35387 623 7714 T +353 (0)1 6782308

CorporateSupport.Unit@decc.gov.ie www.gov.ie/decc

From: GSI Planning < GSIPlanning@GSI.ie>

Sent: Tuesday 26 April 2022 09:19

To: CorporateSupport.Unit < CorporateSupport.Unit@decc.gov.ie>

Cc: Clare Glanville <Clare.Glanville@decc.gov.ie>; GSI Planning <GSIPlanning@GSI.ie>

Subject: RE: EIS 22/135 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Hi Enda,

Please see text below for return to MKO.

Thanks, Trish

Dear Sir/Madam,

With reference to your email dated 11 April 2022, regarding the proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping, please note that Geological Survey Ireland has no specific comment or observations to make on this matter since our last response 21/476.

If you have any further queries or if we can be of further assistance, please do not hesitate to contact me Trish Smullen, or my colleague Clare Glanville at <a href="mailto:GSIPlanning@gsi.ie">GSIPlanning@gsi.ie</a>.

Yours sincerely,

Trish Smullen Geological Survey Ireland

From: GSI Planning Sent: 11 April 2022 15:57

Cc: GSI Planning

Subject: EIS 22/135 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

EIS 22/135

Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping, Ballyvourny, Co Cork [cf. 21/476]. Request for observations by MKO Ireland to be forwarded via the CSU mailbox. Scoping document and letter are enclosed.

Regards,

John

From: Niamh McHugh < <a href="mailto:nhmchugh@mkoireland.ie">nhmchugh@mkoireland.ie</a>>

Sent: Monday 11 April 2022 10:19

**To:** CorporateSupport.Unit < <a href="mailto:CorporateSupport.Unit@decc.gov.ie">CorporateSupport.Unit@decc.gov.ie</a>>

Cc: Eoin O'Sullivan < eosullivan@mkoireland.ie >

Subject: FW: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

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Dear Sir/Madam,

I refer to an EIA Scoping Document you received in December as part of the preparation for an Environmental Impact Assessment Report Statement (EIAR) for the proposed Knocknamork Grid connection and Turbine delivery route for the permitted Knocknamork renewable energy development, on the Cork-Kerry county boundary.

MKO are currently conducting an EIAR Scoping exercise for the Proposed grid connection and turbine delivery route.

Any comments in relation to this project would be welcomed.

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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From: Niamh McHugh

Sent: Monday 20 December 2021 10:38

To: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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# **An Roinn Iompair** Department of Transport



Ms. Niamh Mc Hugh MKO Tuam Road, Galway H91 VW84Y 210732 13<sup>th</sup> January 2022

Your Ref:

Re:EIA Scoping Document for the Proposed Substation and Grid Connection to Knocknamork Renewable Energy Development near Ballyvourney, Co. Cork

# Dear Niamh,

The Department of Transport considers it important where the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following:

- Their presence within the public road could significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works.
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a "legacy road" (where there is no designed road structure and the subgrade may be poor or poorly drained) the design needs to take account of all the variable conditions and not be based on a sample of the general conditions.
- The possible effect on the remaining available road space (noting that there
  may be need to accommodate other utilities within the road cross-section in the
  future).
- The necessity to have the power in the cables switched off where the Road Authority considers this necessary in order to carry out its function to construct and maintain the public road.

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

- Examination of options other than the routing of cables along the public road,
- Examination of options for connection to the national grid network at a point closer to the wind farm in order to reduce the adverse impact on public roads.
- Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance,



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

The Department considers the following should be considered when applying conditions to any approval.

- A condition requiring the specific approval of the local authority to the detail of
  the final route of cables through the public road space. If during construction
  there is a need to deviate from the detailed design then the approval of the local
  authority would again be sought. This would assist in minimising the impact on
  the public road.
- A condition requiring the developer to comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.
- A condition requiring that the location of the cables would be recorded as
  exactly as possible (maybe using BIM type technology) so as to facilitate the
  further use of road space for utilities and the maintenance/construction of the
  public road by the Roads authority. This record should be lodged with the local
  authority and with the ESB Networks for retention on their records.
- A condition requiring the developer to route cables away from bridge structures and specifically preventing the developer from attaching cables to road bridges.
   This would allow for the future maintenance of bridges without interruption of the electricity supply along the cables.
- A condition requiring the developer to notify the Roads Authority of the owner of
  the cables (Owner) and the controller (Power Controller) of the power
  transmitted along the cables. In addition, the condition should require Owner
  and Power Controller to notify the Roads Authority of any change in ownership
  of the cables or change of Power Controller transmitting power along the
  cables. In all instances the Owner and Power Controller should be required to
  maintain an agreed contacts list with the Roads Authority.

Yours sincerely,

Jacqui Traynor

Reform Communications Emergency Planning

An Roinn Iompair

Department of Transport



Lána Líosain, Baile Átha Cliath, D02 TR60 Leeson Lane, Dublin, D02 TR60 gcu@transport.gov.ie

From: esbnetworks@esb.ie

Sent: Monday 20 December 2021 10:47

To: Niamh McHugh

Subject: Re: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection

Route [#426210]



Bhain do rphost ESB Networks amach. Tá muid faoi an-chuid brú faoi láthair. Seans go dtógfaidh sé níos faide orainn teacht ar ais chugat ná mar is gnách, ach tá muid ag déanamh ár ndíchill na ceisteanna go léir a fhreagairt a luaithe is féidir.

Chun éigeandáil a thuairisc nó eolas a thabhairt faoi idirbhrisí soláthair glaoigh le do thoil ar 1800 372 999 nó +35321 238 2410 láithreach.

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Dear Sir/ Madam,

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Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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Is tuairimí nó dearcthaí an údair amháin aon tuairimí nó dearcthaí ann, agus ní gá gurb ionann iad agus tuairimí nó dearcthaí ESB.

Má bhfuair tú an ríomhphost seo trí earráid, ar mhiste leat é sin a chur in iúl don seoltóir.

Scanann ESB ríomhphoist agus ceangaltáin le haghaidh víreas, ach ní ráthaíonn sé go bhfuil ceachtar díobh saor ó víreas agus ní glacann dliteanas ar bith as aon damáiste de dhroim víreas.

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



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#### 1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Cunnane Stratton Reynolds on behalf of Fáilte Ireland to update their EIA guidelines in line with changes in legislative requirements.

# 2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€8.4 billion**, and exchequer revenue of **€1.78 billion** in 2018, which helps fund other key public services.

In 2018 Ireland welcomed 10.6 million overseas visitors.

Fáilte Ireland is the National Tourism Development Authority. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

# 3. Legislation and Statutory Guidance

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

# Legislation

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

# Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Draft guidelines on the information to be contained in Environmental Impact Assessment Reports in August 2017. At the time of this document the guidelines have not been adopted from draft.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

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

# Screening

Through 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.

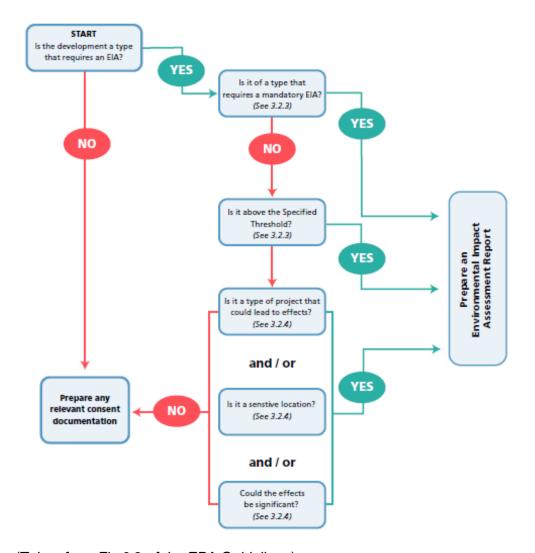


Figure 1: EIAR Screening Process

# (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
- Safetv
- 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 my 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 an figures, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed <a href="here">here</a>

#### 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 <a href="here">here</a>

#### 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 (RSESs) should be consulted.

# Central Statistics Office

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.





MKO, Tuam Road, Galway, Ireland, H91 VW84

18 January 2022

Re: EIA Scoping Document for the Proposed Substation and Grid Connection to Knocknamork Renewable Energy Development near Ballyvourney, Co. Cork

Your Ref: 210732 Our Ref: 21/476

Dear Niamh,

Geological Survey Ireland is the national earth science organisation and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our <a href="website">website</a> for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your email received on the 20<sup>th</sup> December, concerning the EIA Scoping Document for the proposed substation and grid connection to Knocknamork Renewable Energy Development, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

We are pleased to see use of our Soils, Groundwater Aquifer, and Groundwater Vulnerability datasets within the EIAR.

#### Geoheritage

A national inventory of geoheritage sites known as County Geological Sites (CGSs) is managed by the Geoheritage Programme of Geological Survey Ireland. CGSs, as adopted under the National Heritage Plan, include sites that are of national importance which have been selected as the very best examples for NHA (Natural Heritage Areas) designation. NHA designation will be completed in partnership with the National Parks and Wildlife Service (NPWS). CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online Map Viewer.

The audit for Co. Cork commenced in 2021 and will run for a three-year period. The CGSs for Kerry remain unaudited and as such there is limited detailed information on each site available publicly. The sites for each county are listed in a master list of unaudited sites and can be viewed online under the Geological Heritage tab on the online <a href="Map Viewer">Map Viewer</a> as sites with buffer zones but no specific site boundary. Our records show that there are no CGSs in the vicinity of the proposed Substation and Grid Connection to the Knocknamork Renewable Energy Development.

#### Groundwater

Geological Survey Ireland's <u>Groundwater and Geothermal Unit</u>, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.





Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer, which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

The Groundwater Resources (Aquifers) data viewer indicates the proposed substation and grid connection to Knocknamork Renewable Energy Development is underlain by a 'Locally Important Aquifer – Bedrock which is Moderately Productive only in Local Zones'. The Groundwater Vulnerability map indicates both 'High' and 'Extreme' groundwater vulnerability within the area covered. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability in your assessments, as any groundwater-surface water interactions that might occur would be greater in these areas.

The Groundwater Protection Response overview and link to the main report is here: <a href="https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx</a>

#### **Geological Mapping**

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found <a href="https://example.com/here">here</a>, in your future assessments.

#### **Geotechnical Database Resources**

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

#### **Geohazards**

Landslides are common in areas of peat, rock near surface and in fine to coarse range materials (such as glacial tills), areas which are found within the proposed substation and grid connection for Knocknamork Renewable Energy Development. Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated Map Viewer. Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to contact me, Clare Glanville, or my colleague, Trish Smullen, at <a href="mailto:GSIPlanning@gsi.ie">GSIPlanning@gsi.ie</a>.

Yours sincerely,

Clare Glanville
Senior Geologist

**Geological Survey Ireland** 

Enc: Table - Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes.





#### Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018)

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#### Notes:

- 1. The maps and data listed above are available on the Geological Survey Ireland map viewer https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx
- 2. Please read all disclaimers carefully when using Geological Survey Ireland data
- 3. Geological Survey Ireland and Irish Concrete Federation published guidelines for the treatment of geological heritage in the extractive industry in 2008.

Version No. 1 Geological Survey Ireland April 2021

From: Alison Harvey <aharvey@heritagecouncil.ie>

Sent: Monday 20 December 2021 11:33

To: Niamh McHugh

**Subject:** Automatic reply: [External] 210732 - Proposed Knocknamork Turbine Delivery Route

and Grid Connection Route Scoping

Thank you for your email. I am on annual leave from the 20th December until the 4th January. I will respond to your email when I get back to the laptop.

Regards

Alison (Ali) Harvey MIPI AILI



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

> Phone: 021 4921801 E-Mail:ehonl@hse.ie

Date:

06 January 2022

Name:

Ms. Niamh McHugh, MKO, Tuam Road, Galway

Consultant's reference:

210732 Proposed Substation and Grid Connection Cabling to Knocknamork Renewable Energy Development, Co. Cork

Re:

**EIA Scoping Report** 

Proposed development:

Proposed substation and grid connection, Ballyvourney, Co. Cork

Applicant:

Roadstone Ltd

**EHIS Reference:** 

2109

Dear Ms. McHugh

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 23 December 2021

- Emergency Planning David O'Sullivan
- Estates Helen Maher/Stephen Murphy
- Assistant National Director for Health Protection National Clinical Director for Health Protection
- CHO Michael Fitzgerald

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

Yours sincerely

Catherine McCarthy

Catherine M'Carthy

Principal Environmental Health Officer

# **HSE EIAR Scoping Report**

# **Environmental Health Service Consultation Report**

# (as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)

Date: 06 January 2022

Proposed Development: Proposed Substation and Grid Connection Cabling to

Knocknamork Renewable Energy Development, Co. Cork

Applicant: Knocknamork Ltd.

Our reference: EHIS 2109

Report to: Niamh McHugh, Graduate Environmental Scientist, MKO,

Tuam Road, Galway

Consultant's reference: 210732

Type of consultation: Scoping Consultation

# **General Introduction**

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

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

https://www.housing.gov.ie/sites/default/files/publications/files/guidelines for planning authorities and an bord pleanala on carrying out eia - august 2018.pdf

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

http://ec.europa.eu/environment/eia/pdf/EIA guidance EIA report final.pdf

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

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

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

- a) Description of the receiving environment;
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;
- d) Proposed mitigation measures;
- e) Residual impacts.

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

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

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

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 17 December 2021.

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

- Public Consultation
- Proposals for the substation and grid in the decommissioning phase of the wind farm.
- Noise & Vibration impacts during construction and operational phases
- Air Quality impacts during construction phase
- Surface and Groundwater Quality impacts during the construction phase
- Geological Impacts
- Ancillary facilities
- Cumulative impacts

#### **Public Consultation**

Whilst it is acknowledged that the grid connection route is located in predominantly rural area, it is recommended that early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts particularly during the construction phase of the grid connection have been adequately addressed.

All parties affected by the proposed development must be fully informed of what the proposal entails.

Sensitive receptors and other stakeholders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed grid connection during both its construction and operation. Any schools, pre-school facilities and medical facilities in the area should be contacted as part of the consultation process.

The Environmental Impact Assessment Report (EIAR) should clearly demonstrate the link between any issues raised as a result of public consultation and how these issues have been addressed in the EIAR.

#### Construction

A construction and environmental management plan (CEMP) should be provided with the EIAR. This should comprehensively outline working procedures and any necessary mitigation measures that will be provided. The impact of construction work (noise, dust, potential rodent issues, any disturbance to water supplies, impacts on access to homes and businesses during the works) along with the impact of increased construction traffic on residents in the vicinity should be assessed in the EIAR. Mitigation and traffic management measures should be outlined.

#### **Later Consents Required**

Information on possible future monitoring requirements for the operation of the substation should be included in the EIAR

#### Complaints procedure

The EIAR should include proposals for dealing with complaints from members of the public should they arise.

#### **Noise & Vibration**

The potential impacts of noise and vibration from the proposed construction phase of the grid connection on noise sensitive locations must be clearly identified in the EIAR. The EIAR must also

consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration.

A full and thorough noise survey must be carried out to assess the impact of noise from both the construction and operation of the proposed substation on any sensitive receptors in the vicinity.

#### **Air Quality**

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

- Provision of a water bowser on site, regular spraying of all public roads accessed or crossed during the construction phase.
- Inspect and clean public roads in the vicinity if necessary

# **Surface and Ground Water Quality**

The construction phase of the proposed development has the potential to impact the quality of both surface and ground water. All drinking water sources, both surface and ground water, within the vicinity of the proposed route must be identified. Public and Group Water Scheme sources and supplies should be identified. Measures to ensure that all sources and supplies are protected should be described. The Environmental Health Service recommends that a survey of the cable route is undertaken in order to identify the location of private wells used for drinking water purposes.

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

#### **Geological impacts**

An assessment of the impact construction work may have on the future stability of ground conditions should be assessed.

## **Ancillary Facilities**

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

# **Cumulative Impacts**

All existing or proposed developments in the vicinity should be clearly identified in the EIAR. The impact on any sensitive receptors of the proposed development combined with any other existing or proposed developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed development.

Vincent Heavey

Vint Keny

Environmental Health Officer North Lee Environmental Health Floor 2, Block 1

Floor 2, Block 1 St Finbarr's Hospital

Douglas Road Cork T12 XH60

Carolina Huesta

Environmental Health Officer Environment OU Ennistymon Health Centre Ennistymon

Co. Clare V95 W681





HS	E South Eme	rgency Manager	nent Con	sultation	Report	
Report to	Catherine McCa	rthy, PEHO, Cork		Date	10 <sup>th</sup> January, 2022	
Type of cons Other (pleas		Scoping X Screenin	g 🗆 EIAR 🗆	ЕРА 🗆		
Authority		HSE				
<b>Authority Re</b>	ference Number	EHIS 2109				
EM Reference Number		EMENV 117				
Applicant / Consultants		MKO, Project Management, on behalf of Knocknamork Ltd., Ballyvourney, Co. Cork.				
Proposal		Road widening works for Knocknamork Ballyvourney, Co. Cork	Renewable		ine delivery route velopment, near	

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

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

All correspondence or any queries with regard to this report should be forwarded to Ms. Maryanne Horgan, Emergency Management Office, HSE South, Eye, Ear and Throat Hospital, Western Road, Cork, T12 WP62 or <a href="maryanne.horgan@hse.ie">maryanne.horgan@hse.ie</a>





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

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

	GIVE THE FOLLOWING INFORMATION
This is:	Eircode
(N	ame, Telephone Number and Eircode Address of site)
An incid	lent has occurred at this site - standby for ETHANE message
E	
	Exact location of the incident
T	
•	Type of incident, e.g.; fire, explosion, gas leak, etc
Н	
	Hazards – current and potential
Δ	
	Access and Egress – what is the safest approach route for
	responding emergency services and where is your emergency services meeting point (RVP)
N	
	Number of casualties and their condition – specify adult / children if known
F	
	The emergency services present and required
N.B. If y	ou require another emergency service stay on the line and repeat the steps again



From: Catherine Kerins < Catherine.Kerins@fisheriesireland.ie>

Sent: Monday 20 December 2021 10:58

To: Niamh McHugh

**Subject:** Automatic reply: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid

**Connection Route Scoping** 

Thank you for your correspondence

I am currently on leave until 6th January, I will respond to your email on my return. regards

Catherine Kerins



Ms. Niamh McHugh MKO Tuam Road Galway

17 January 2022

RE: Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Ms. Mc Hugh,

Thank you for your recent email regarding the above mentioned

The site of the proposed development encompasses the upper Clydagh and Foherish Rivers and their tributaries, significant salmonid fisheries. In this context IFI would ask that the following requirements should be taken into consideration.

There should be no drainage, crossing, bridging, culverting or other physical interference with the bed or bank of any watercourse without prior consultation with IFI.

Suspended solids and or hydrocarbon contaminated site run-off waters must be controlled adequately so that no pollution of surface waters can occur. More specifically IFI feels the following issues should be addressed

- i. Identifying and zoning the project for environmental impact should a peat slip occur
- ii. Setting out contingency plan should a peat movement occur.
- iii. Setting out a plan for the control of silt in such a scenario, including measures to be put in place at the initial stages of construction.

In the event of any watercourse crossings being bridged or culverted the following general criteria should apply;

- 1. The free passage of fish must not be obstructed.
- 2. Span watercourse crossings are the preferred option
- 3. Design details on any proposed crossing should be forwarded to IFI for consideration and incorporated at planning stage
- 4. Instream works should be carried out only in the July-September period.

I would ask you to revert when further design detail is available.

Yours sincerely,
MMP
Michael Mc Partland

Environmental Officer.

From: Mark O'Sullivan <mark.osullivan@kerrycoco.ie>

**Sent:** Friday 7 January 2022 09:35

To: Niamh McHugh

**Subject:** FW: 210732 - Informal Scoping Request: Proposed Knocknamork Turbine Delivery

Route and Grid Connection Route

You don't often get email from mark.osullivan@kerrycoco.ie. Learn why this is important

Hi Niamh,

We have reviewed the scoping documentation for the proposed Knocknamork turbine delivery route and grid connection route. I note that the proposed development straddles two waterbodies. The uppermost waterbody, the Flesk (KERRY)\_010 is described as not at risk as per WFD Risk 3<sup>rd</sup> cycle. The lower water body, the Flesk (KERRY)\_020 is described as at risk as per WFD Risk 3<sup>rd</sup> cycle. Our overriding concern would be the potential impact on surface water quality downstream of the proposed development particularly during the construction phase of the proposed development. I would suggest that attention is placed on any potential downstream impacts particularly as the Clydagh River is a tributary of the River Flesk, which in turn constitutes the main water body flowing into Lough Leane.

Regards Mark

Mark O' Sullivan, Environment Section, Kerry County Council 066 7162000

From: Niamh McHugh < <a href="mailto:nhmchugh@mkoireland.ie">nhmchugh@mkoireland.ie</a>>

**Sent:** Monday 20 December 2021 11:28 **To:** environ <<u>environ@kerrycoco.ie</u>>

Subject: 210732 - Informal Scoping Request: Proposed Knocknamork Turbine Delivery Route and Grid Connection

Route

[CAUTION FROM KERRY COUNTY COUNCIL I.T. DEPARTMENT: EXTERNAL SENDER] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/ Madam,

# **Informal Scoping Request:**

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards,

# Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

# MKO

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





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From: roads <roads@kerrycoco.ie>
Sent: Monday 20 December 2021 12:22

To: Niamh McHugh

**Subject:** RE: 210732 - Informal Scoping Request: Proposed Knocknamork Turbine Delivery

Route and Grid Connection Route

Dear Ms McHugh,

I wish to acknowledge receipt of your e-mail below and I wish to inform you that I have forwarded your correspondence to Stephen Sheehan, Killarney MD Engineer and John Ahern, Senior Executive Engineer, Killarney Municipal District, for their attention.

Kerry County Council, Killarney Municipal District Office, Town Hall, Killarney; Phone: 064 6631023; E-Mail: Killarneymd@kerrycoco.ie

Regards
Ann-Marie Crean
Assistant Staff Officer
Roads, Transportation and Marine
Kerry County Council
( 066 – 7183588 or Ext. 3907)
amcrean@kerrycoco.ie

From: Niamh McHugh <nhmchugh@mkoireland.ie>

Sent: Monday 20 December 2021 11:26

To: roads < roads@kerrycoco.ie>

Subject: 210732 - Informal Scoping Request: Proposed Knocknamork Turbine Delivery Route and Grid Connection

Route

[CAUTION FROM KERRY COUNTY COUNCIL I.T. DEPARTMENT: EXTERNAL SENDER] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/ Madam,

#### **Informal Scoping Request:**

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

#### MKO

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From: Maeve Ryan <mryan@lawsat.ie>
Sent: Tuesday 4 January 2022 16:11

To: Niamh McHugh
Cc: Eoin O'Sullivan

Subject: RE: 210732 - Proposed Knocknamork TDR and Grid Connection Scoping Exercise

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#### Dear Niamh

LAWPRO doesn't have any role in the planning arena for Local Authorities or An Bord Pleanala. We're not statutory consultees and wouldn't normally get involved in EIA scoping or in any part of the planning process. You may have already forwarded the documents to the relevant local authority staff but if not, I can send you on details of the appropriate contact people in the environment sections of Kerry and Cork County Council if you need that information?

Kind Regards

# Maeve

Maeve Ryan | Catchments Manager South West Region

# Local Authority Waters Programme Clár Uiscí na nÚdarás Áitiúil

Limerick City and County Council Corporate Headquarters Merchants Quay Limerick V94 EH90





facebook.com/LAWPROteam @WatersProgramme

# **NSAI** Certified





From: Niamh McHugh < nhmchugh@mkoireland.ie>

**Sent:** Tuesday 4 January 2022 14:58 **To:** Maeve Ryan <mryan@lawsat.ie>

Cc: Eoin O'Sullivan <eosullivan@mkoireland.ie>

Subject: 210732 - Proposed Knocknamork TDR and Grid Connection Scoping Exercise

Dear Ms. Ryan,

Please find the attached scoping document and relevant cover letter detailing the Proposed Knocknamork Turbine Delivery Route and Grid Connection Route, which are located along the Cork-Kerry Border. The relevant details for this project are contained within the scoping document which is attached with this email.

Should you have any queries, questions or general feedback, please do not hesitate to contact me.

Wishing you a happy New Year.

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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From: MKO-Admin

Sent: Tuesday 4 January 2022 12:25

To: Niamh McHugh

Subject: FW: EIA scoping document for grid connection to Knocknamurk Renewable Energy

Development - your ref 210732

Kind Regards, Anna.



Anna O'Gara Administrator

#### **MKO**

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From: Colum O'Dwyer <colum.odwyer@mottmac.com>

Sent: 04 January 2022 12:23

To: MKO-Admin <info@mkoireland.ie>

Subject: EIA scoping document for grid connection to Knocknamurk Renewable Energy Development - your ref

210732

You don't often get email from <a href="mailto:colum.odwyer@mottmac.com">colum.odwyer@mottmac.com</a>. Learn why this is important

Sir/Madam,

We have received a copy of the above referenced EIA Scoping Document addressed to the South-Western RBD Project Office in the past few weeks. Please note that the RBD project office is no longer at this address. I suggest any correspondence is addressed to the relevant local authorities.

Regards, Colum

## Colum O'Dwyer

BE CEng FIEI Associate D +353 (0)21 480 9843 colum.odwyer@mottmac.com LinkedIn



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From: INFO <Information@tii.ie>

Sent: Tuesday 21 December 2021 13:04

To: Niamh McHugh

Subject: RE: 210732 - Proposed Knocknamork Grid Connection Route and Turbine Delivery

Route Scoping. TII Ref: TII21-116625.

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## Dear Ms. McHugh,

I wish to acknowledge receipt of your correspondence of 20 December 2021, regarding the above.

The matter is receiving attention and a further reply will issue as soon as possible.

### Yours sincerely,

#### **Andrew Moore**

Regulatory and Administration Executive





From: Niamh McHugh < <a href="mailto:nhmchugh@mkoireland.ie">nhmchugh@mkoireland.ie</a>>

Sent: Monday 20 December 2021 11:35

To: Landuse Planning <LandUsePlanning@tii.ie>

Subject: 210732 - Proposed Knocknamork Grid Connection Route and Turbine Delivery Route Scoping

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Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env)

Graduate Environmental Scientist

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From: INFO <Information@tii.ie>
Sent: Thursday 6 January 2022 10:53

To: Niamh McHugh

**Subject:** EIAR Scoping - Proposed Knocknamork Grid Connection Route and Turbine

Delivery Route. TII Ref: TII21-116625.

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#### Dear Ms. McHugh,

Thank you for your correspondence of 20 December 2021 regarding an EIAR scoping for a proposed Knocknamork grid connection route and turbine delivery route. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (TII) will endeavour to consider and respond to planning applications referred to it, given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines, as outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). Regard should also be had to other relevant guidance available at <a href="https://www.TII.ie">www.TII.ie</a>.

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road 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. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

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

- It appears that the proposed windfarm site accesses the local and regional road network prior to access to the national road network. Access to the road network shall be developed in accordance with official policy and road safety considerations, as outlined above. Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in proximity to the proposed development.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts.

- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the 'Manual of Contract Documents for Road Works').
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Roads Authority (NRA), 2006).
- The EIAR/EIS 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., NRA, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (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. In relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development, with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer, to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of Public Private Partnership (PPP) Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities, in association with TII.

The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses, to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal 'length' loads (e.g., tearing of the surface course, etc.) shall be rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the road authority prior to the commencement of any development on site.

Designers should consult TII Publications to determine whether a Road Safety Audit is required for any of the temporary works proposed. Any recommendations should be incorporated into designs.

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 the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities'.

There are around 99,000km of roads in Ireland. The national road network, which caters for strategic interurban travel, consists of approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this national road network is maintained and significant Government investment already made in the national road network is safeguarded.

The provision of cabling along the national road network represents a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy. Therefore, TII advises that grid connection cable routing should seek to utilise the extensive existing local road network, or alternatives, as opposed to the strategic national road network, contrary to the provisions of official policy.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. TII requests referral of all proposals agreed and licensed between the road authority and the applicant, which affect the national road network.

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.

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 this information is of assistance to you.

#### Yours sincerely,

#### **Alban Mills**

Senior Regulatory and Administration Executive



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# **Eoin O'Sullivan**

From:

Niamh McHugh

Sent:

11 April 2022 10:17

To:

planning@cru.ie

Cc:

Eoin O'Sullivan

**Subject:** FW: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection

**Route Scoping** 

**Attachments:** Knocknamork SD F1 - 2021.12.17 - 210732 - Reduced.pdf; 210732 - Com Reg

Scoping Letter - 2021.12.17.pdf

Dear Sir/Madam,

I refer to an EIA Scoping Document you received in December as part of the preparation for an Environmental Impact Assessment Report Statement (EIAR) for the proposed Knocknamork Grid connection and Turbine delivery route for the permitted Knocknamork renewable energy development, on the Cork-Kerry county boundary.

MKO are currently conducting an EIAR Scoping exercise for the Proposed grid connection and turbine delivery route.

Any comments in relation to this project would be welcomed.

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

#### **MKO**

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From: Niamh McHugh

Sent: Monday 20 December 2021 10:29

To: planning@cru.ie

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

# Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env)
Graduate Environmental Scientist

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# **Eoin O'Sullivan**

From: Niamh McHugh
Sent: Niamh McHugh
11 April 2022 10:20

**To:** StatutoryNotifications@Eirgrid.com

**Cc:** Eoin O'Sullivan

**Subject:** FW: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection

**Route Scoping** 

Attachments: Knocknamork SD F1 - 2021.12.17 - 210732 - Reduced.pdf; 210732 - EirGrid Scoping

Letter - 2021.12.17.pdf

#### Dear Sir/Madam,

I refer to an EIA Scoping Document you received in December as part of the preparation for an Environmental Impact Assessment Report Statement (EIAR) for the proposed Knocknamork Grid connection and Turbine delivery route for the permitted Knocknamork renewable energy development, on the Cork-Kerry county boundary.

MKO are currently conducting an EIAR Scoping exercise for the Proposed grid connection and turbine delivery route.

Any comments in relation to this project would be welcomed.

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env) Graduate Environmental Scientist

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From: Niamh McHugh

**Sent:** Monday 20 December 2021 10:49 **To:** StatutoryNotifications@Eirgrid.com

Subject: 210732 - Proposed Knocknamork Turbine Delivery Route and Grid Connection Route Scoping

Dear Sir/ Madam,

Please see the attached Scoping Document and relevant Cover Letter detailing the Proposed Grid Connection Route and Turbine Delivery Route for the Permitted Knocknamork Renewable Energy Development, Co. Cork/ Kerry. The attached documents provide detail on the proposed scope of this development.

Any comments or queries you may have in relation to the Proposed Development would be welcomed, and can be returned to this email address at your earliest convenience.

# Nollaig Shona!

Kind Regards, Niamh.



Niamh McHugh B.Sc (Env)
Graduate Environmental Scientist

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