

Cork County Council

Ann Kilmartin

From: Sean Molloy <smolloy@jodireland.com> on behalf of Sean Molloy
Sent: Tuesday, January 26, 2021 12:15 PM
To: Ann Kilmartin
Subject: RE: 6225 GWF & 6226 IWF - Pre-Planning Mtg. with Cork County Council - Scoping Opinion
Attachments: Scoping Report Inchamore wind farm.docx; scoping report for gortyrhilly wind farm.docx; PPW 6225 Gortyrhilly WF & PPW 6226 Inchamore WF EO Advices FV.docx

From: Thomas Watt <Thomas.Watt@CorkCoCo.ie>
Sent: Friday 22 January 2021 16:57
To: Sean Molloy <smolloy@jodireland.com>
Cc: Greg Simpson <Greg.Simpson@CorkCoCo.ie>; Carol Stack <Carol.Stack@CorkCoCo.ie>
Subject: RE: 6225 GWF & 6226 IWF - Pre-Planning Mtg. with Cork County Council - Ecology Scoping Documents

Hi Sean

Some comments following our MSteam meeting from last Thursday, (14th). This is not exclusive list and further comments are attached, prepared by Carol Stack and initial comments of our heritage team (ecology) prior to the meeting.

I'd like to reiterate that we would be happy to meet again prior to your submission to ABP to facilitate application.

- I refer you to CDP objective HE 2- 3 Biodiversity outside protected areas and the Heritage Chapter as a whole
- Would be useful to add rationale for view point locations, some new viewing points from the new N22 would be of value
- Would be worthwhile making contact with Area Engineers listed by Greg and our archaeologist Mary Sleeman and Conservation Officer, Mona Hallinan for built heritage issues arising
- Site adjoins Kerry Co Co area identified as not be appropriate for wind farms. An exploration of how this proposal relates to this area, being so close to Co boundary. – its visual impact or potential ecological impact to National Park. Can you differentiate between the two, can you mitigate the qualifying interests which underly the KCC policy?
- Identify Met Mast and clarify height
- Ecology unit has identified some turbines they have concerns with. See attached comments.
- Determine grid connection and include same in application for turbines would be advisable
- Submit rationale for separate application processes (SID / PP), grid connection being one aspect of that judgement
- Clarify the duration of construction
- Welcome your stated approach of avoidance of bog.
- Welcome distances achieved from residential units, in line with draft national guidelines

Regards

Tom



www.corkcoco.ie

Scoping Opinion - Gortyrähilly Wind Farm, Ballingear, Co. Cork



An EIAR Assessment Scoping report and consultation request has been received (13/11/20) for a proposed **SID** for the construction of approximately 16 no. wind turbines each typically of 4.5 – 6 megawatts (MW) with a combined output of approximately 80MW located between the villages of Ballyvourney and Ballingear in the Múscraí Gaeltacht, Co. Cork.

The proposals will also include planning permission for the construction of an underground grid connection to Ballyvouskill 220kV substation, Co. Cork, located approximately 14km to the north east of the Development.

Purpose of scoping request is so that key environmental issues/concerns can be identified early and the development can be designed to avoid or minimise any potentially significant environmental effects, and that any remaining likely significant effects can be assessed appropriately.

The Proposed Development

The Developer intends to apply to An Bord Pleanála (ABP) as a Strategic Infrastructure Development (SID) project (subject to the outcome of a pre-application consultation process with ABP).

A pre-application letter was submitted to An Bord Pleanála on the 11th of September 2020 for a determination as to whether this project constitutes Strategic Infrastructure Development.

The 7th Schedule to the 2000 Act [as amended] lists the classes of infrastructure development which, if considered by the Board to be strategic infrastructure development, requires direct application to the board.

“An installation for the harnessing of wind power for energy production (a wind farm) with more than 25 turbines or having a total output greater than 50 megawatts.”

Proposed development involves;

- 710 hectares of land
- 16 no. 4.5-6mw wind turbines
- Overall ground to blade tip height of up to 185m rotor diameter of up to 155m and a hub height in region of 11m,
- Site access roads, crane hardstand areas and turbine foundations,
- Development of a site drainage network
- On site borrow pit
- Internal wind farm underground power and communications cabling
- On site 38kV substation and a 110kV grid connection
- Permanent met mast
- Temporary site compound
- Upgrade works on turbine delivery route from Foynes or Ringaskiddy port
- Recreational community and biodiversity improvements associated with development

Planning Dept. Feedback

The following should be noted:

- Site is within an area;
 - where wind farms are open to consideration
 - within landscape character types 12a – Rolling Marginal Middle ground, 15a - Ridged and Peaked Upland and 16c – glaciated cradle valleys
 - within Transitional rural area
 - where site boundary runs c.2km from the Kerry border
 - close to scenic routes – road between Lissacresig and mouth of the glen and winding road joining coolea – coom road to Lissacresig road.
 - Where Southern end of site is within natura 2000 screening zone for the gearagh SAC
- Information to be contained in EIAR – report submitted for scoping covers the various EIAR requirements already – follow all relevant guidelines including EIA guidelines, relevant Wind Energy Guidelines, EPA advice notes and relevant legislation.
- The EIAR and construction practice and methodology should take into account existing ground conditions onsite and best practise. Disposal or elimination of waste/surplus material from construction/site clearance, particularly significant for peatland sites.
- Reasonable alternatives to be considered (as per scoping doc) and must also indicate the main reasons for the option chosen taking into account the effects of the project on the environment.

- Grid connection needs to be finalised - Should the grid connection not form part of the planning application, the EIAR should indicate the most likely corridor of the grid connection, its width and route and the likely nature of the connection in terms of line voltage, whether it will be underground (preferred) or over ground (including details of pole type) and any ancillary equipment (e.g. substations).
- Cumulative impacts to be considered (as per scoping doc) - include an assessment of all the existing or approved wind farm developments in the area. In addition the EIAR should also take into account any existing or approved large scale developments in the area.
- Consider transboundary effects given proximity to Kerry Border (C.2km)
- Might be worthwhile including some vantage points from new Macroom bypass route in terms of visual impacts.

C.Stack,

Exec. Planner.

11/1/21

Ecology Office Advices - Pre-Planning / General Scoping

PPW: 6225 Gortyrhilly Wind Farm, Co. Cork and PPW: 6226 Inchamore Wind Farm, Co. Cork

These comments are made without prejudice and are based on a review of General Scoping Documents and Ecology Scoping documents received in respect of the above mentioned windfarm sites and are also based on publicly available information. I do not have access to any site specific ecological data in relation to these sites.

Please note that this document was updated following receipt of Ecological Scoping Reports – text included in purple to reflect same.

At the outset, given the proximity of the two windfarm sites to one another (c.3km) and given their location within the same general area and catchment and probable use of the same grid connection infrastructure and access, the question of project splitting will need to be addressed at the outset to determine whether the two projects should be considered as a single project.

In any event both projects will need to be assessed as part of the cumulative impacts assessment together. Any cumulative impacts assessment should also consider solar projects within the area having particular regard to cumulative impacts on protected species, habitats of high natural value including peatland habitats, other upland habitats and on freshwater habitats.

Having regard to the site context, the assessment of peat stability will be an important element of these applications. Key concerns from an ecological perspective are:

- Potential for impact on sites designated or proposed to be designated for protection of biodiversity;
- Potential for impact on habitats of high natural value; and
- Potential for impact on protected species.

Aerial imagery indicates that the proposed developments comprises of areas intact peatland habitats and upland habitats of high natural value. This is a concern from an ecological perspective as it is generally recommended to **avoid intact upland habitats**, in particular peatland habitats when identifying appropriate sites for development of wind farms. For this reason, I would refer you to policy HE 2-3 of the CDP and to reconsider the positioning of some of the works (see detailed comments below in respect of sites).

Based on the mapping presented, it appears that neither of the sites overlap with the boundaries of any site which is designated or proposed to be designated for nature conservation. However, screening for Appropriate Assessment will be required to identify whether there are any potential pathways for impact linking these sites to any such site, looking in particular at potential hydrological linkages to any such site. To that end it should be noted that the site is located within the Lee - Sullane River catchment.

Without direct knowledge of the site, issues we will be likely to be looking closely at are:

- Assessment of impact on upland habitats including intact peatlands. Per above, it is recommended that development **on intact peatland habitats and upland habitats of high natural value is avoided**.

- Potential for the project to give rise to negative effects on freshwater habitats and having particular regard to potential impacts on Fresh water pearl Mussel and Salmon. To this end, there should be a focus at design stage on providing for an appropriately designed surface water management system which minimises risk of release of contaminants to surface waters and ensures that there is no increase in surface water run-off from the site. Avoidance of disturbance of peat based habitats will greatly assist with this.
- Any species specific surveys which are deemed to be required including bird surveys must be completed by qualified and experienced practitioners following recognised best practise methods. It should be noted that up to two years' full season surveys are required for certain bird species should a potential impact on any such species be identified as a possible risk having regard to reference. [Ornithological summary results presented in scoping documentation dates from 2017 to 2019 and given the time lapse, supplementary surveys for the intervening period will be required. Please present mapping of any habitat loss respective to foraging and breeding sites as part of assessment.](#)
- [With regard to bat activity, if commuting and foraging routes of bats relative to proposals could be presented and if these routes could also be presented respective of habitats on site including any habitat loss associated with the development.](#)
- Decommissioning and reinstatement should be considered in detail and shall include opportunities for biodiversity enhancement where possible.

The Biodiversity chapter of the EIAR should be prepared to accord with CIEEM Guidelines should be prepared taking account of National and EU Guidelines as well as recent case law.

No details of grid connection options were incorporated into the pre-planning enquiry. As per the AP's comments full details of options shall be detailed and assessed as part of the applications.

Specific Comments in relation to Inchamore Windfarm

Per above comments and based on constraints mapping, it is recommended that development is avoided within areas identified as:

- 'largely intact upland blanket bog' and 'cutaway blanket bog with intact areas' located in proximity to turbine 3 and associated developable areas within the vicinity of these habitats; and
- areas comprising of a 'Mosaic of Upland Blanket Bog and Wet Heath' in proximity to the developable area associated with turbine 1.
- Ecological Scoping document acceptable in principle

Specific Comments in relation to Gortyrhilly Windfarm

Per above comments and based on constraints mapping, it is recommended that development is avoided within areas identified as:

- 'blanket bog' in proximity to the developable area associated with turbine 8.

Joy Barry.

Joy Barry
Ecology Office Planner
03/02/2020

Ann Kilmartin

From: Sean Molloy <smolloy@jodireland.com> on behalf of Sean Molloy
Sent: Monday, July 25, 2022 9:21 AM
To: Shirley Bradley
Subject: FW: 6225 Gortyrahilly Wind Farm Ballyvourney Co. Cork - Grid Connection & Turbine Delivery Route Drawings

Kind Regards,

Sean Molloy.

B. Eng. M. Sc. CEng MIEI Dip. PM



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

Tel: [+353719161416](tel:+353719161416) Email: smolloy@jodireland.com Web: www.jodireland.com



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From: James Dwyer <James.Dwyer@CorkCoCo.ie>
Sent: Monday 4 July 2022 13:13
To: Sean Molloy <smolloy@jodireland.com>
Subject: RE: 6225 Gortyrahilly Wind Farm Ballyvourney Co. Cork - Grid Connection & Turbine Delivery Route Drawings

Sean,

Very well – thanks!

My comments on the delivery route are as follows:

- My previous comment re the junction off the N22.
- The consents for the re-installation of the temporary bridge could be difficult.
- Widening and strengthening of the local road network from the main Coolea/Ballyvourney road south will be required.

Regarding the grid connection:

- All bridges will require HDD - no cable is to be attached to any bridge.

- Any existing culverts exposed along the route must be replaced across the full width of the road with a suitably sized pipe. Also such points must be notified to the local Council office as they are exposed. A location and photographic record of these crossings is to be maintained and handed over to the local Council office once the grid route on the public road is complete.
- A full width regrading and resurfacing will be required on all sections of public road affected.
- Specific details required where the proposed grid route crosses the existing grid route serving Grousemount Wind Farm.
- Joint Bays are to be off the road line.
- Any diversion routes are to be suitably prepared to ensure that they are fit for the level of traffic expected. These routes must be maintained (hedgcutting/potholing/etc) for the duration of any diversion.
- The contractor will have to maintain the temporary reinstatement in a good condition until a permanent reinstatement is completed.

Regards

Séamus O'Dhuibhir | Innealtóir Feidhmiúcháin Sinsearach | **Bóithre agus Iompar**

Comhairle Contae Chorcaí | Halla an Bhaile | Maigh Chromtha | Co. Chorcaí | P12 YX48 | Éire
F +353-(0)26 – 41047

james.dwyer@corkcoco.ie | www.corkcoco.ie

Tairseach na gcustaiméirí: www.yourcouncil.ie

James Dwyer | Senior Executive Engineer | **Roads & Transportation**

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Customer Portal: www.yourcouncil.ie



Smaoinigh ar an timpeallacht sula ndéanann tú an ríomhphost seo a phriontáil. Please consider the Environment before printing this mail.

From: Sean Molloy <smolloy@jodireland.com>

Sent: Monday 4 July 2022 12:24

To: James Dwyer <James.Dwyer@CorkCoCo.ie>

Subject: RE: 6225 Gortyrähilly Wind Farm Ballyvourney Co. Cork - Grid Connection & Turbine Delivery Route Drawings

CAUTION FROM CORK COUNTY COUNCIL IT SECURITY: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi James,

I hope you enjoyed your time off.

I was just wondering if you will get the opportunity to compile your list of comments about the above over the coming days?

Kind Regards,

Sean Molloy.

B. Eng. M. Sc. CEng MIEI Dip. PM

Kerry County Council



Kerry County Council,
County Buildings, Tralee, Co. Kerry.
Tel: (066) 7183582 Fax: (066) 7120328
E-mail: plan@kerrycoco.ie

Comhairle Chontae Chiarraí,
Aras an Chontae, Trá Lí, Co. Chiarraí.
Gutháin: (066) 7183582 Faics: (066) 7120328
Web: <http://www.kerrycoco.ie>

Re: Pre-Planning Consultation

24th August 2021

Sean Molloy
Jennings O Donovan & Partners Ltd
Finisklin Business Park
Sligo

Dear Sir,

I am writing to you in relation to your recent Pre-Planning Application.

Details as follows

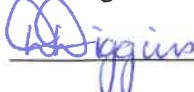
Reference Number: PP 21/362
Applicant Name: Coillte CGA
Applicant Address: Coillte Regional Office, Hartnetts Cross, Macroom, Co Cork,
Site Location: Derryreag, Cummeenavrick, Glashacormick, Clydaghröe,
Cummeennabuddoge, Townlands

Please be advised of the following observations/comments by the area planner in relation to your proposed development:

- Proposed grid connection and haul route the proposed Inchamore wind farm in Cork.
- EIA. AA. Archaeology.
- TII/N22 implications. Area is zoned Secondary Special Amenity in the County Development Plan.
- It should be noted that the site is outside of the area zoned as "open to consideration" in the Renewable Energy Strategy.

Please quote reference number and include copy of this report if a planning application is to be submitted in relation to this site.

Kind Regards



ASO Planning

JENNINGS O'DONOVAN
& PARTNERS LIMITED
Finisklin Business Park, Sligo.

26 AUG 2021

Sean Molloy, Bneera,

RECEIVED

AK

Please note: The carrying out of consultations shall not prejudice the performance by a planning authority of any other of its functions under the Planning and Development Act 2001 - 2020, or any regulations made under said act and cannot be relied upon in the formal planning process or in legal proceeding.

Minister for Housing, Planning and Local Government

Ann Kilmartin

From: Housing Minister <MINISTER@housing.gov.ie> on behalf of Housing Minister
Sent: Monday, November 16, 2020 2:21 PM
To: akilmartin@jodireland.com
Subject: RE: 6225 Gortyrhilly Wind Farm, Co. Cork

16 November 2020

Ms. Ann Kilmartin
akilmartin@jodireland.com

Dear Ms. Kilmartin,

Thank you for your email Darragh O'Brien, TD, Minister for Housing, Local Government and Heritage, in connection with your 6225 Gortyrhilly Wind Farm, the contents of which have been noted.

Yours sincerely,

Niamh Redmond
Private Secretary

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Friday 13 November 2020 14:32
To: Housing Minister <MINISTER@housing.gov.ie>
Cc: Sean Molloy <smolloy@jodireland.com>; Sarah Moore <smoore@jodireland.com>
Subject: 6225 Gortyrhilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached letter and General Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin





Date 03rd December 2020

Ms. Ann Kilmartin
Jennings O Donovan & Partners Limited
Finisklin Business Park
Co Sligo
F91RHH9

Development: Gortyrally Wind Farm, Co. Cork

Dear Ms Kilmartin

The Irish Aviation Authority SRD Aerodromes division notes that Turbine No. 11 is approximately 37kms South East of Kerry Airport. The aerodrome operator should be contacted and requested to assess whether a preliminary screening assessment is required in relation to the potential impact on instrument flight procedures or any communication, navigation and surveillance equipment at Kerry Airport.

Subject to that being completed and no likely significant impact being noted, the Aerodromes division would likely issue the following general observation during the formal planning process: In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:

- (1) agree an aeronautical obstacle warning light scheme for the wind farm development,
- (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location

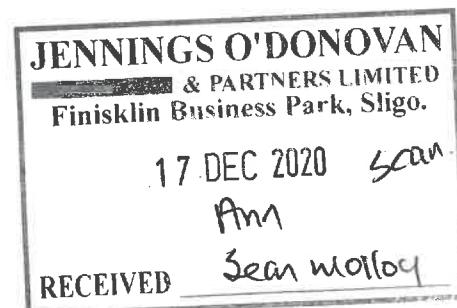
| <i>Turbine No.</i> | <i>WGS-84 Co-ordinates</i> | <i>Ground elevation (Malin Head OD)</i> | <i>Blade tip elevation of turbine (Malin Head OD)</i> | <i>Height of turbine (height from ground level to blade tip)</i> | <i>Confirm if turbine has obstacle lighting.</i> |
|--------------------|----------------------------|---|---|--|--|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

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

Yours sincerely

PP:

Deirdre Forrest
Corporate Affairs



Bord Stúirtheoirí/Board of Directors

Michael McGrail (Cathaoirleach/Chairperson),
Peter Kearney (Príomhfhéidhmeannach/Chief Executive)
Cian Blackwell, Marie Bradley, Ernie Donnelly,
Gerry Lumsden, Joan McGrath, Eimer O'Rourke

Oifig Chláraithe:

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

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The Times Building, 11-12 D'Olier Street
Dublin 2, D02 T449, Ireland
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Kerry Airport

Ann Kilmartin

From: Sarah Moore <smoore@jodireland.com> on behalf of Sarah Moore
Sent: Wednesday, January 27, 2021 9:09 AM
To: Ann Kilmartin
Subject: FW: 6225 Gortyrhilly Wind Farm, Co. Cork

From: Kerry Airport <info@kerryairport.ie>
Sent: Tuesday 12 January 2021 09:58
To: smoore@jodireland.com
Subject: FW: 6225 Gortyrhilly Wind Farm, Co. Cork

Hello Sarah,

From the information received the nearest point on the site appears to be over 30 kms from the extended centreline of Runway 08/26 and also over 30kms from the Aerodrome Reference Point. The site is, therefore, over 15kms outside the Outer Horizontal Surface (which extends from the ARP out to a distance of 15kms).

This should not have any affect on the operations of the airport, based on the position we will not be making any submissions.

Regards,

Howard Jones
Chief Operating Officer

email: howard.jones@kerryairport.ie



WILD ATLANTIC KERRY.

Farranfore, Killarney, Co. Kerry, Ireland. V93 KHF7
tel: (0)66 976 4644 | fax: (0)66 976 4134 | www.kerryairport.ie



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Registered Office: Farranfore, Killarney, Co. Kerry, Ireland. www.kerryairport.ie

From: Kerry Airport
Sent: 12 January 2021 09:25
To: John Mulhern

Cc: Howard Jones; Basil Sheerin; Tom O' Driscoll
Subject: FW: 6225 Gortyrahilly Wind Farm, Co. Cork

From: Sarah Moore <smoore@jodireland.com>
Sent: Tuesday 12 January 2021 09:21
To: Kerry Airport <info@kerryairport.ie>
Cc: Sean Molloy <smolloy@jodireland.com>; Ann Kilmartin <akilmartin@jodireland.com>
Subject: FW: 6225 Gortyrahilly Wind Farm, Co. Cork

Dear Sirs,

I am following up on the email I sent 21st December 2020 regarding the above mentioned project.

If you could revert with any comments as soon as possible it would be greatly appreciated.

Thanks and kind regards

Sarah Moore



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)
Tel: +353719161416 **Email:** smoore@jodireland.com **Web:** www.jodireland.com

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From: Sarah Moore <smoore@jodireland.com>
Sent: Monday 21 December 2020 10:12
To: 'info@kerryairport.ie' <info@kerryairport.ie>
Cc: 'Ann Kilmartin' <akilmartin@jodireland.com>; 'Sean Molloy' <smolloy@jodireland.com>
Subject: 6225 Gortyrahilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.



**An Roinn Turasóireachta, Cultúir,
Ealaíon, Gaeltachta, Spóirt agus Meán**
Department of Tourism, Culture,
Arts, Gaeltacht, Sport and Media

Your Ref: 6225/503/ESD/001
Our Ref: G Pre00234/2020
(Please quote in all related correspondence)

19 April 2021

Sarah Moore
For: Jennings O'Donovan & Partners Limited
Finisklin Business Park
Sligo
F91 RHH9

Via email: smoore@jodireland.com cc: smolloy@jodireland.com

Re: Request for Scoping Opinion on information to be included in the preparation of an Environmental Impact Assessment (EIA) for Gortyrhilly Wind Farm, Ballingeary, County Cork.

A chara

I refer to correspondence dated 12th November 2020 received in connection with the above. Outlined below are Nature Conservation observations/recommendations co-ordinated by the Development Applications Unit.

Nature Conservation

Thank you for your consultation letter of 12th November 2020 regarding the proposed Gortyrhilly wind farm as detailed in the attached Scoping Document of November 2020, and subsequent e-mail of 30th March 2021.

The following scoping is not comprehensive, and is without prejudice to any recommendations that this Department may make to An Bord Pleanála concerning a strategic infrastructure application on foot of information collected or collated as part of the EIA and appropriate assessment (AA) process. A number of guidance documents for professional consultants have been published on the quality of ecological data in EIA¹, and there are numerous contemporary Environmental Impact Assessment Reports (EIARs) available for wind farm proposals in upland areas, many parts of which show good practice.

With the exception of turbines 1, 2, 4 and 6, the proposed development is not within, adjacent to, or significantly upstream of a designated or proposed European site (Special Area of Conservation (SAC), candidate Special Area of Conservation (cSAC), Special Protection

¹ E.g. the CIEEM guidance referred to in the Scoping Report

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigi an Rialtais

Government Offices

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

Newtown Road, Wexford, County Wexford, Y35 AP90



Area (SPA), proposed Special Protection Area (pSPA) or Natural Heritage Area (NHA), or proposed Natural Heritage Area (pNHA). Turbines 1, 2 and 4 appear to be within the catchment of the River Lee, and turbine 6 within the catchment of the Toon River, both upstream of the Gearagh Special Area of Conservation (SAC) (Site Code. 000108), designated by the European Union Habitats (The Gearagh Special Area of Conservation 000108) Regulations 2019 (S.I. No. 523 of 2019). Conservation objectives for this site are available at

https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000108.pdf.

Natura Impact Statement (NIS)

A NIS is recommended because of in-combination effects of wind farm drainage with other wind farm, forestry and land drainage, on potential downstream erosion and peat siltation of the Gearagh cSAC. Some years ago, a petition to the European Parliament (1056/2013²), and associated complaint to the European Commission, raised this issue in relation to developments in the River Toon catchment affecting the Gearagh cSAC, especially drainage associated with wind farms.

Increased efficiency of drainage of upland areas, due to the combination of many drainage works for farms, forests and roads, can, at least initially, result in accelerated runoff, with greater storm hydrographic peaks where more water flows through the river system in a shorter time period (e.g. Holden *et al.*, 2006³). This can exacerbate flood levels in rivers due to the increasing magnitude of rain events, likely to be due to climate change, where exceptional falls of rain occur in more intense and more frequent periods (e.g. Fowler *et al.*, 2007⁴). Any one unmitigated drainage project can apparently have minor effects, but taken together with many others in a catchment, the in-combination effect can be significant.

The above turbines appear to be within the catchment of the River Toon, which flows into the Gearagh cSAC downstream of Toon Bridge. Here it enters one of the best of the very few examples of an anastomosing⁵ lowland forested river in north-west Europe. Approximately 0.4km below Toon Bridge the larger River Lee begins to contribute to the anastomosing system from the south. The issue here is whether increased spate loads (increased hydrographic peaks) on the Toon and Lee Rivers are contributing to (a) erosion and loss of islands in the Toon and Lee parts of the system, and/or (b) isolation and drying of secondary water diversion channels. Apparently, a critical feature of anastomosis is the occurrence of erosion resistant banks and stable channels (unlike braided rivers), and the question is whether these can be eroded by increased surface drainage volumes in the catchment

²Petition no. 1056/2013: https://www.europarl.europa.eu/doceo/document/PETI-CM-537221_EN.pdf?redirect

³ Holden, J., Evans, M.G., Burt, T.P. and Horton, M. (2006) Impact of land drainage on peatland hydrology. *Journal of Environmental Quality* **35**: 1764-1778.

⁴ Fowler, H., Ekström, M., Blenkinsop, S. and Smith, A.P. (2007) Estimating change in extreme European precipitation using a multi-model ensemble. *Journal of Geophysical Research* **112** D18104, doi: 10.1029/2007JD008619.

⁵ 'Anastomosing' rivers have multiple, interconnected, co-existing channel belts on alluvial plains (Makaske, B. (2001) Anastomosing rivers: a review of their classification, origin and sedimentary products. *Earth-Science Reviews* **53**: 149-196). The river and the woodland habitat must be taken together as a coherent biogeomorphological system (Brown, A.G. (1997) Biogeomorphology and diversity in multiple-channel systems. *Global Ecology and Biogeography Letters* **6**: 179-185).



upstream, and whether future surface drainage for wind farms, such as the proposed development, will contribute to this.

Increased erosion is now a characteristic of many spate rivers in high rainfall areas in the western counties of Ireland. It is technically difficult to disassociate the effects of climate change (increased magnitude rain events) from increased surface runoff due to better land drainage, and the extent of the latter can also depend on soil properties. Separating the effects of near-receptor site lowland drainage from drainage further up the catchment is also difficult. However, both mitigation measures to attenuate surface runoff speed from wind farm road drains, and a clear and precise assessment of their likely success, is required.

Environmental Impact Assessment Report (EIAR)

For the EIAR, there are a number of protected species occurring in the area potentially impacted by the wind farm that the EIAR should fully assess:

1. There have been a number of fatalities of white-tailed sea eagles, caused by collisions with turbine blades, in wind-farms to the south-west of the proposed development. An understanding of current and predicted future use by white-tailed eagles of the development site would be expected of the EIAR. In particular, the EIAR should assess the locations of turbines with respect to valley and slope topography which increase the risk of collision with eagles gaining height on updrafts, based especially on published Norwegian data. Also, a programme for livestock carcass monitoring and management needs to be put in place, to avoid attracting eagles into the rotor-swept area of turbines.
2. The proposed wind farm is mostly within the catchment of the River Sullane, which, in addition to fish species of conservation importance (please consult Inland Fisheries Ireland for scoping), contains a population of the freshwater pearl mussel. The (high) water quality requirements of this species should be taken into account in designing siltation control measures. The combination of clean water diversion, lined multicelled stone-constructed sediment ponds which can be cleaned by suction rather than excavated out, an environmental management plan, alarmed autosamplers, and previous best-practice upland construction experience indicates that a sediment control system could control sediment release such that it will not have an adverse effect on freshwater life downstream.
3. In connection with the above also, a thorough geotechnical stability risk and hydrogeological assessment needs to be carried out of areas of relatively deep peat soil, not just for turbine foundations, but also for access roads, borrow pits, drains, etc. There are a number of cases of peat slides during upland wind-farm construction, and the scientific investigations of the causes of these should be taken into account in the EIAR.
4. Other protected species that require species-appropriate survey methods following published best practice are (a) red grouse, (b) merlin, (c) hen harrier, (d) golden plover, (e) curlew, (f) Leisler's bat, (g) Kerry slug and (h) marsh fritillary. Note that both merlin, roosting hen harrier and sometimes curlew are often difficult to detect, and have been underestimated previously in some EIARs, so experienced observers



are recommended. Golden plover must be taken into account in cumulative assessment with other wind farms in the Cork/Kerry Mountains. Leisler's bat may be more susceptible to collision or baro-trauma, so turbine locations which overlap with feeding features need to be taken into account. A licence application for addressing any direct impacts on Kerry slug habitat may be necessary. Marsh fritillary may not be present in suitable habitat every year due to their metapopulation dynamics, so suitable habitat should also be recorded (as mentioned on page 6 of the Scoping Report).

5. There are a few upland protected plant species (including mosses and liverworts – see S.I. No. 356 of 2015, Flora Protection Order) which need to be surveyed for if or where suitable habitat exists in the development footprint.
6. It is now well established that climate change is likely to have a considerable impact on biodiversity and wildlife, due to droughts, floods, sea level rise, changes in seasonal weather, etc. The impact of CO₂ emissions from extensive peat excavation, if this is to be carried out, needs to be fully accounted.
7. Impacts from associated works: (a) The likelihood of increases in nutrient loading of the River Sullane from forestry felling should also be assessed⁶; (b) The effect of haul road widening and bridge upgrade works on protected species (e.g. otter, Kerry slug, Daubenton's and other bat species) should also be assessed; (c) if underground cables are to transport electricity, then river/stream crossings need to be examined, especially if in designated rivers.
8. The focus on habitats of conservation importance which are not protected, in the Scoping Report (page 6), is welcome. It should be kept in mind that some external funding agencies at European or global level are now expecting no net loss of biodiversity as part of their funding requirements.
9. The visibility of the turbines from Killarney National Park, although not an ecological issue, needs to be assessed elsewhere in the EIAR.
10. Section 3.6 refers to assessment of ornithological impacts during construction and operation. Assessment of decommissioning, because of its often similar disturbance effects to construction, should also be assessed.
11. Finally, reliance on post-planning approval of detailed works (e.g. river crossings), and monitoring design, by the National Parks & Wildlife Service (NPWS) of the Department, should be avoided as (a) it may indicate inadequacies of assessment by the EIAR, and (b) staff may not be available to support this in the time frame of an active construction project.

A regional officer of the NPWS Ecological Assessment Unit is available for an on-line meeting (Starleaf, Teams, preferable) to clarify any of the above, as requested. However, the detail of the scope and methodology of the EIAR surveys are a matter for the expert consultants advising the developer, who should be aware of up-to-date best-practice guidance in their respective fields.

⁶ See, for instance, Heal, K., *et al.* (2020) Wind farm development on peatlands increases fluvial macronutrient loading. *Ambio* **49**: 442-459.



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

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

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

Is mise, le meas

Development Applications Unit

Ann Kilmartin

From: info@birdwatchireland.ie
Sent: Friday, November 13, 2020 3:10 PM
To: Ann Kilmartin
Subject: RE: 6225 Gortyrhilly Wind Farm, Co. Cork

Hi Ann ,
We would like to confirm receipt of your email which has been forwarded to our Policy officer .

Regards,
Michelle Kavanagh,
Membership Department.
BirdWatch Ireland
Unit 20 Block D | Bullford Business Campus | Kilcoole | Greystones | A63 RW83 | Co.Wicklow | Ireland
Tel: +353 (0)1 281 9878 email: mkavanagh@birdwatchireland.ie
Website: www.birdwatchireland.ie

'Please note that due to current Covid-19 restrictions most BirdWatch Ireland Staff will be working from their homes .Please be assured that your email will be answered as soon as possible.'

BirdWatch Ireland - protecting wild birds and their habitats

BirdWatch Ireland - protecting birds and biodiversity

Cairde Éanlaith Éireann - ag caomhnú éin agus bithéagsúlacht

To join as a member, make a donation, volunteer or shop online visit www.birdwatchireland.ie or call us on +353 (0)1 281 9878

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Friday 13 November 2020 14:38
To: info@birdwatchireland.ie
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6225 Gortyrhilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached letter and Ecology Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin

From: IWT Office <office@iwt.ie> on behalf of IWT Office
Sent: Tuesday, February 16, 2021 4:42 PM
To: Ann Kilmartin
Cc: IWT Office
Subject: Re: 6226 Inchamore Wind Farm, Co. Cork

Hi Ann,

I'm afraid we don't have capacity to respond to either right now.

Regards,
Kieran

On Tue, 16 Feb 2021 at 15:08, Ann Kilmartin <akilmartin@jodireland.com> wrote:

Hi Kieran,

Thank you for getting back to me.

We also issued a scoping document in relation to Gortyrhilly Wind Farm in Co. Cork.

Have you any feedback in relation to this proposed development?

Thanks and kind regards,

Ann

From: IWT Office <office@iwt.ie>
Sent: Tuesday, February 16, 2021 2:29 PM
To: Ann Kilmartin <akilmartin@jodireland.com>
Cc: IWT Office <enquiries@iwt.ie>
Subject: Re: 6226 Inchamore Wind Farm, Co. Cork

Dear Ann,

Thank you for contacting the Irish Wildlife Trust.

We do not have the capacity to consider or respond to your scoping / consultation request for this development at the moment.

Regards,

Kieran

The Irish Wildlife Trust

On Mon, 15 Feb 2021 at 12:42, Ann Kilmartin <akilmartin@jodireland.com> wrote:

Dear Sirs,

I would be obliged if you could please provide an update in relation to your feedback on the above proposed development.

Thanks and kind regards,

Ann

On Mon, Nov 16, 2020 at 9:49 AM Ann Kilmartin <akilmartin@jodireland.com> wrote:

Dear Sirs,

Please find attached letter and Ecology Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

Tel: [+353719161416](tel:+353719161416)

Email: akilmartin@jodireland.com

Web: www.jodireland.com



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**Geological Survey of Ireland /
Minister for Environment, Climate and Communications**



Sarah Moore
Jennings O'Donovan & Partners Ltd.
Finisklin Business Park
Sligo, F91 RHH9

20 November 2020

Re: Request for Scoping Opinion on information to be included in the preparation of an Environmental Impact Assessment (EIA) for Gortyrhilly Wind Farm, Ballygeary, Co. Cork.

Your Ref: 6225/503/SL/007/SM
Our Ref:20/289

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

Dear Sarah,

With reference to your letter dated 12 November 2020, concerning the preparation of an EIA for the proposed Gortyrhilly Wind Farm, Ballygeary, Co. Cork, Geological Survey Ireland (a division of the Department of Environment, Climate and Communications) would like to make the following comments.

Geoheritage

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

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

The audit for Co. Cork has not yet been completed, however unaudited CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). **Our records show that there is an unaudited CGSs in the vicinity of the proposed wind farm development.**

Gortnabinna, Co. Cork (GR 116250, 71200), under IGH theme: IGH 10, Devonian. The road section at Gornabiina contains a number of Devonian trace fossils. These well preserved Beaconite-like burrows occur in fluvial Old Red Sandstone (ORS).



With the current plan, there may be potential impacts on the integrity of current CGS envisaged by the proposed development, should these sites not be assessed as constraints. **Ideally, the road section containing the trace fossils should not be damaged or integrity impacted or reduced in any manner due to the proposed development.** However, this is not always possible, and in this situation appropriate mitigation measures should be put in place to minimize or mitigate potential impacts. Where the integrity cannot be preserved we would ask that careful consideration be given in design to accommodating preservation of the road section faces and access to the site during construction to record the exposures to strengthen our knowledge and datasets. We would also ask that the design of any future development considers the use of information panels as appropriate to highlight the significance of the impacted CGS. Please contact Clare Glanville (Clare.Glanville@gsi.ie) for further information and possible mitigation measures if applicable.

Groundwater

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

Through our [Groundwater Programme](#), Geological Survey Ireland provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. **We recommend using our National Aquifer, Vulnerability and Recharge maps on our [Map viewer](#) to this end.**

The Groundwater Vulnerability map indicates the proposed wind farm area is of variable vulnerability. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' which can be used to inform appropriate mitigation measures.

Our [GW Flood](#) project is a groundwater flood monitoring and mapping programme aimed at addressing the knowledge gaps surrounding groundwater flooding in Ireland. The project is providing the data and analysis tools required by local and national authorities to make scientifically-informed decisions regarding groundwater flooding. **Although primarily focused on karst areas, this may provide information to benefit the proposed wind farm development. We recommend using our [GW Flood](#) tools found under our programme activities (in conjunction with OPW data), to this end.**

With regards to Climate Change, there is a need to improve the monitoring capacity of groundwater levels in Ireland so that the potential impacts of climate change can be monitored and assessed. In this context the GSI has established the GWClimate project in January 2020. GWClimate will 1) establish a long-term strategic groundwater level monitoring network and 2) develop modelling and analytical approaches for evaluating the impacts of Climate Change to Irish groundwater systems. **Further information can be found on the [Groundwater flooding page](#) of the Groundwater Programme.**

Geological Mapping

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



Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. **Landslide susceptibility in the area of the proposed wind farm is variable and is classed from Moderately Low / Moderately High to High.** Geological Survey Ireland has information available on past landslides for viewing as a layer on our [Map Viewer](#). Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and GWFlood Groundwater Flooding. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Natural Resources (Minerals/Aggregates)

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

In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed development are sustainably sourced from properly recognised and licensed facilities.

Other Comments

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

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

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

Yours sincerely,

Trish Smullen
Geoheritage Programme
Geological Survey Ireland



Iascach Intíre Éireann
Inland Fisheries Ireland

Ms Sarah Moore
Jennings and O'Donovan Consulting Engineer's,
Finisklin Business Park
Sligo,
Ireland,
F91 RHH9

23 November 2020

RE: Gortyrhilly Windfarm- Scoping Report Consultation

Dear Sarah,

I refer to the request for scoping opinion on information to be included in the preparation of an Environmental Impact Assessment (EIA) for Gortyrhilly Wind Farm, Ballingeary, Co. Cork. Wind Farm, Ballingeary, Co. Cork

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

There should be no drainage 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,

- (i) The free passage of fish must not be obstructed.
- (ii) The original slope of the river bed should be maintained with no sudden drops on the downstream side. Design details on any proposed crossing should be incorporated at planning stage
- (iii) Bridges are preferable to culverts.
- (v) All instream works should be carried out only in the May-September period.

Yours sincerely,

MMP
Michael Mc Partland.
Environmental Officer.

Irish Peatland Conservation Council

Ann Kilmartin

From: Irish Peatland Conservation Council <bogs@ipcc.ie> on behalf of Irish Peatland Conservation Council
Sent: Monday, February 15, 2021 12:12 PM
To: Ann Kilmartin
Subject: Re: 6225 Gortyrhilly Wind Farm, Co. Cork

Hi Ann,

We have no comments to make at this time.

Tristram Whyte BSc (Hons) Applied Freshwater & Marine Biology
Conservation, Policy & Fundraising Officer
Irish Peatland Conservation Council
Lullymore
Rathangan
Co. Kildare
R51 V293

045 860133

bogs@ipcc.ie

CHY6829

Registered Charity Number 20013547

Visit <http://www.ipcc.ie> to learn all about the Save the Bogs Campaign or to arrange your visit to the Bog of Allen Nature Centre

On 15 Feb 2021, at 12:03, Ann Kilmartin <akilmartin@jodireland.com> wrote:

Dear Sirs,

I would be grateful if you could please provide a response to my previous email at your earliest convenience.

Thanks and kind regards,

Ann

On Fri, Nov 13, 2020 at 2:41 PM Ann Kilmartin <akilmartin@jodireland.com> wrote:

Dear Sirs,

Please find attached letter and Ecology Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin

<image001.jpg>

Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

Tel: [+353719161416](tel:+353719161416)

Email: akilmartin@jodireland.com

Web: www.jodireland.com

<image002.jpg>

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Broadcasting Authority of Ireland

Ann Kilmartin

From: Roger Woods <rwoods@bai.ie> on behalf of Roger Woods
Sent: Monday, November 16, 2020 10:31 AM
To: akilmartin@jodireland.com
Subject: RE: 6226 Inchamore Wind Farm, Co. Cork

Hi Ann

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

Regards

Roger

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

Tel: 01 6441200
Fax: 01 6441299

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

From: Reception BAI <reception@bai.ie>
Sent: Monday 16 November 2020 10:24
To: Roger Woods <rwoods@bai.ie>
Subject: FW: 6226 Inchamore Wind Farm, Co. Cork

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Monday 16 November 2020 09:55
To: Reception BAI <reception@bai.ie>
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6226 Inchamore Wind Farm, Co. Cork

Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin

From: Thomas Sheridan <thomas.sheridan@eir.ie> on behalf of Thomas Sheridan
Sent: Friday, November 27, 2020 4:09 PM
To: Ann Kilmartin
Cc: Sarah Moore; Sean Molloy
Subject: Re: 6225 Gortyrhilly Wind Farm, Co. Cork

Dear Ann,

I have checked the attached wind turbine layout and I can confirm that there should be no impact on the eircom LTD microwave radio network.

Regards,
Tom

On Fri, Nov 13, 2020 at 2:59 PM Ann Kilmartin <akilmartin@jodireland.com> wrote:

Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

ENET

Ann Kilmartin

From: Peter O'Brien <peter.obrien@enet.ie> on behalf of Peter O'Brien
Sent: Friday, February 19, 2021 10:29 AM
To: akilmartin@jodireland.com
Subject: RE: 6226 Inchamore Wind Farm, Co. Cork

Hi Ann,

I created the kml's myself just now and below are the links we have near these turbines:

Inchamore Wind Farm:

| A-End Coordinates | A-End Antenna Height | B-End Coordinates | B-End Antenna Height | Link Frequency |
|-------------------------------|----------------------|-------------------------------|----------------------|----------------|
| 51°56'26.00"N 9°18'21.00"W | 15m | 51°58'58.46"N 9° 8'37.17"W | 13m | 18GHz |

Gortrahilly Wind Farm:

| A-End Coordinates | A-End Antenna Height | B-End Coordinates | B-End Antenna Height | Link Frequency |
|-------------------------------|----------------------|-------------------------------|----------------------|----------------|
| 51°39'56.86"N 9°26'35.11"W | 15m | 51°58'58.46"N 9° 8'37.17"W | 15m | 13GHz |

Regards,
Peter

Peter O'Brien | Tx Planning Engineer
A: 15C Magna Drive, Citywest, D24 YC95
M: +353 (0) 86 7744313 | W: www.enet.ie



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From: Peter O'Brien
Sent: Wednesday, February 17, 2021 8:03 AM
To: akilmartin@jodireland.com
Subject: FW: 6226 Inchamore Wind Farm, Co. Cork

Hi Ann,

Can you send the proposed wind farms to me in a Google Earth kml so that I can review against our network?

Regards,
Peter

Peter O'Brien | Tx Planning Engineer
A: 15C Magna Drive, Citywest, D24 YC95
M: +353 (0) 86 7744313 | W: www.enet.ie



Registered in Ireland, Registration No. 332982
Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52
enet is a registered business name of e-nasc éireann teoranta

From: Ger Wallace <ger.wallace@enet.ie>
Sent: Monday, February 15, 2021 1:30 PM
To: Peter O'Brien <peter.obrien@enet.ie>
Cc: Ronan McDonogh <ronan.mcdonogh@e-net.ie>; Planning <planning@enet.ie>
Subject: FW: 6226 Inchamore Wind Farm, Co. Cork

Hi Peter,

Think these should have went to you back in November. Doesn't look like they were forwarded. Can you look at them and review for this lady?

Regards,
Ger

Ger Wallace | Senior Fibre Network Planner
A: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52
M: +353 (0) 87 6400525 | W: www.enet.ie



Registered in Ireland, Registration No. 332982
Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52
enet is a registered business name of e-nasc éireann teoranta

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Monday 15 February 2021 12:44
To: Planning <planning@enet.ie>
Subject: Re: 6226 Inchamore Wind Farm, Co. Cork

Dear Sirs,

I would be obliged if you could please provide an update in relation to your feedback on the above proposed development.

Thanks and kind regards,

Ann

On Mon, Nov 16, 2020 at 10:02 AM Ann Kilmartin <akilmartin@jodireland.com> wrote:

Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

Tel: [+353719161416](tel:+353719161416)

Email: akilmartin@jodireland.com

Web: www.jodireland.com



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Ann Kilmartin

From: Matthew Craig <matthew.craig@2rn.ie> on behalf of Matthew Craig
Sent: Tuesday, November 17, 2020 2:09 PM
To: Ann Kilmartin
Cc: Sarah Moore; windfarms@rte.ie; Johnny Evans
Subject: RE: 6225 Gortyrahilly Wind Farm, Co. Cork

Hi Ann,

2RN have three off air links that pass through the proposed Turbine locations. The Turbine numbers 1, 4 and 9 are of particular concern.

| Site | Lat. | Long. | Ant. Height (m AMSL) at 474 MHz | Ant. Height (m AMSL) at 90MHz |
|--------------|----------|----------|---------------------------------|-------------------------------|
| Mullaghanish | 51.98339 | -9.14431 | 857 | 755 |
| Bantry | 51.6658 | -9.4431 | 223 | 218 |

| | | | |
|--------------|----------|----------|-----|
| Mullaghanish | 51.98339 | -9.14431 | 857 |
| Mt. Gabriel | 51.55603 | -9.54312 | 412 |

For the 90 MHz service we require a 400m corridor and 350m for the 474 MHz service.

There is also a risk of interference to DTT viewers in the Ballingeara area. We would therefore request that a protocol be signed between the developer and 2RN should the site go ahead.

Regards

Matthew Craig

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

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From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: 13 November 2020 15:01
To: windfarms@rte.ie; Matthew Craig <matthew.craig@2rn.ie>
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6225 Gortyrahilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

Tel: [+353719161416](tel:+353719161416)

Email: akilmartin@jodireland.com

Web: www.jodireland.com



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Tetra Ireland

Ann Kilmartin

From: Thomas Barry <Tom.Barry@TETRAIRELAND.IE> on behalf of Thomas Barry
Sent: Wednesday, December 9, 2020 6:53 AM
To: Ann Kilmartin
Cc: Sarah Moore
Subject: RE: EXTERNAL MAIL:- 6225 Gortyrahilly Wind Farm, Co. Cork

Ann,

We anticipate no impact from the development as proposed. Can you ensure the proposal is also reviewed by eir.

Regards,
Tom

From: Ann Kilmartin [mailto:akilmartin@jodireland.com]
Sent: Friday 13 November 2020 15:04
To: Thomas Barry
Cc: Sarah Moore
Subject: EXTERNAL MAIL:- 6225 Gortyrahilly Wind Farm, Co. Cork

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Dear Sirs,
??

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.
??

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

??
??

Thanks and kind regards,
??

Ann Kilmartin
??
??



??
Head Office
Finisklin Business Park, Sligo, Ireland, F91 RHH9.?? [MAP](#)
Tel: [+353719161416](tel:+353719161416)????????????? Email: akilmartin@jodireland.com????????????????? Web: www.jodireland.com



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Virgin Media Television

Ann Kilmartin

From: Paul Driver <Paul.Driver@virginmedia.ie> on behalf of Civils
Sent: Friday, November 13, 2020 3:33 PM
To: Ann Kilmartin
Subject: RE: 6225 Gortyrhilly Wind Farm, Co. Cork

Ann

I refer to your query of 13th November about the above location. Virgin Media does not have any record of underground services at this location as indicated by your drawing.

WHILST THE INFORMATION GIVEN IS BELIEVED TO BE CORRECT NO WARRANTY IS MADE AS TO ITS ACCURACY. THIS INFORMATION MUST NOT BE RELIED UPON IN THE EVENT OF EXCAVATION OR OTHER WORKS CARRIED OUT IN THE SITE AREA. NO LIABILITY OF ANY KIND WHATSOEVER IS ACCEPTED BY VIRGIN MEDIA, ITS SERVANTS OR AGENTS FOR ANY ERROR OR OMISSION IN RESPECT OF INFORMATION CONTAINED WITHIN THIS COMMUNICATION. THE ACTUAL POSITION OF UNDERGROUND SERVICES MUST BE VERIFIED AND ESTABLISHED ON SITE BEFORE ANY MECHANICAL PLANT IS USED.

Regards,

Paul Driver | Plant Protection Officer
Civil Operations
Virgin Media | Unit 7, Westgate Business Park, Ballymount, Dublin 24.
T: +353 (01) 2458586 | M: +353 (0)87 6287133
E: civils@virginmedia.ie | paul.driver@virginmedia.ie



From: Ann Kilmartin [mailto:akilmartin@jodireland.com]
Sent: 13 November 2020 15:02
To: VMTV info <VMTVInfor@virginmedia.ie>; Paul Driver <Paul.Driver@virginmedia.ie>
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6225 Gortyrhilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration. We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,
Ann Kilmartin



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)
Tel: [+353719161416](tel:+353719161416) Email: akilmartin@jodireland.com Web: www.jodireland.com

Vodafone

Ann Kilmartin

From: Burke, Carla, Vodafone Ireland (External) carla.burke@vodafone.com on behalf of Burke, Carla, Vodafone Ireland (External)
Sent: Monday, February 15, 2021 1:33 PM
To: Ann Kilmartin; Lyons, Sean, Vodafone Ireland (External)
Subject: RE: FW: 6225 Gortyrhilly Wind Farm, Co. Cork

Hi,

Please find links that will be effected by 6225 Gortyrhilly Wind Farm, with reference to the PDF file:

| | | | | | | | | |
|-------------------|---------------|-----------|----------|-------------------|-----------|----------|------------------|----|
| CKSRN-CKMGH | CKSRN | 100306.88 | 46879.73 | CKMGH | 121511.5 | 81752.15 | Freq Band | 11 |
| Inchee-Cashelmore | Inchee | 110246.26 | 77239.89 | Cashelmore | 143842.14 | 50839.28 | Freq Band | 11 |
| CKMGH-CK171 | CKMGH | 121511.5 | 81752.15 | CK171 | 115487.79 | 65469.11 | Freq Band | 13 |

Regards,
Carla.

C2 General

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Monday 15 February 2021 12:09
To: Lyons, Sean, Vodafone Ireland (External) <sean.lyons@vodafone.com>
Cc: Burke, Carla, Vodafone Ireland (External) <carla.burke@vodafone.com>
Subject: Re: FW: 6225 Gortyrhilly Wind Farm, Co. Cork

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Dear Sean, Carla,

I would be grateful if you could please provide a response to my previous email at your earliest convenience.

Thanks and kind regards,

Ann

On Mon, Nov 16, 2020 at 8:29 AM Lyons, Sean, Vodafone Ireland (External) <sean.lyons@vodafone.com> wrote:

Hi Carla,

Can you complete the analysis on this proposed windfarm and send your results to Ann and Sarah?



Sean Lyons

****Upcoming leave – Nov 26th to Dec 6th****

Transmission Program Manager

Converged Transmission

Technology- NET

+353877758117

sean.lyons@vodafone.com

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vodafone.ie

The future is exciting.

Ready?

C2 General

From: Ann Kilmartin <akilmartin@jodireland.com>

Sent: Friday 13 November 2020 15:03

To: Lyons, Sean, Vodafone Ireland (External) <sean.lyons@vodafone.com>; Byrne, Gavin, Vodafone Ireland <gavin.byrne@vodafone.com>; Byrne, Fiona, Vodafone Ireland (External) <fiona.byrne2@vodafone.com>

Cc: Sarah Moore <smoore@jodireland.com>

Subject: 6225 Gortyrhilly Wind Farm, Co. Cork

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Dear Sirs,

Please find attached Telecoms Scoping Document in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Department of Defence



Ann Kilmartin
Jennings O'Dovovan
Consulting Engineers
Finiskiln Business Park
Sligo
F91 RHH9

08 December 2020

Re: 6225 Gortyrhilly Wind Farm, Co. Cork

Dear Ms. Kilmartin,

I am writing with regard to your request for comments/observations on the Telecoms Scoping Document for a windfarm at Gortyrhilly, Co. Cork

Following consultations with our Military colleagues at Casement Aerodrome, The Department of Defence would like to make the following observation:

In all locations where wind farms are permitted it should be a condition that they meet the following lighting requirements.

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

The above is a separate requirement to any IAA requirement on lighting.



Please don't hesitate to contact me at the details below if you require further information.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Don Watchorn', is written over a horizontal line.

Don Watchorn
Property Management Branch
Department of Defence
Station Road,
Newbridge
Co. Kildare W12 AD93
045 492199
don.watchorn@defence.ie

Department of Transport, Tourism and Sport



Ms. Sarah Moore
Jennings O' Donovan & Partners Limited
Finisklin Business Park
Sligo
Ireland
F91 RHH9

26th November 2020

Re: Request for Scoping Opinion on information to be included in the preparation of an Environmental Impact Assessment (EIA) for Gortyrahilly Wind Farm, Ballingeary, Co. Cork

Dear Sarah,

I refer to your letter of 12th November 2020 regarding the Scoping Opinion on information to be included in the preparation of an Environmental Impact Assessment (EIA) for Gortyrahilly Wind Farm, Ballingeary, Co. Cork.

In view of the need to protect the resilience of the public road network in the context of climate change pressures, it is considered that the EIAR should include information on what impact the proposed development may have on the public road network both during construction and in the longer term. The EIAR should indicate whether it is proposed to use public roads to connect the windfarm to the grid and if that is the case specify the extent of the works required including drainage, diversions, relocation of services and road re-instatement. The EIAR should also address the future maintenance requirements related to the installation of the cables in public roads and the cost implications for the relevant local authority. Consideration should also be given to how cabling needs to be organised and, where a number of cables are envisaged from existing, approved and proposed developments, rationalised into one cable or a group of cables in one trench in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows). In addition the EIAR should consider the possibility of over-ground solutions for the transmission of electricity as an alternative.

Yours sincerely

Jacqui Traynor
Reform Communications Emergency Planning
Lána Liosain, Baile Átha Cliath, D02 TR60, Éire
Leeson Lane, Dublin 2, D02 TR60, Ireland
T +353 1 6707444 | info@transport.gov.ie
www.gov.ie/transport



An Roinn Iompair
Department of Transport

Environmental Protection Agency

Ann Kilmartin

From: Wexford Receptionist <REC_WEX@epa.ie> on behalf of Wexford Receptionist
Sent: Friday, November 13, 2020 3:29 PM
To: Ann Kilmartin
Subject: Re: 6225 Gortyrhilly Wind Farm, Co. Cork

A Chara,

Your correspondence on November 13th has been forwarded for attention.

Kind regards,

Ruth O'Connor
Duty Receptionist/Programme Officer
Environmental Protection Agency
P.O. Box 3000
Johnstown Castle Estate
Wexford
Y35 W821

Bosca Poist 3000, Eastát Chaisleán Bhaile Sheáin, Contae Loch Garman.

Tel: 00353 53 91 60600: Fax: 00353 53 91 60699: Email: info@epa.ie web: www.epa.ie
Lo Call: 1890 33 55 99

Environmental Protection Agency on Twitter:

<http://twitter.com/EPAIreland>.

EPA Climate Change on Twitter:

<http://twitter.com/EPAClimateNews>

EPA Research on Twitter:

<http://twitter.com/EPAResearchNews>

YouTube:

<http://www.youtube.com/user/epaireland>

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Friday 13 November 2020 15:07
To: Wexford Receptionist <REC_WEX@epa.ie>
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6225 Gortyrhilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached Scoping Letter in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin

Fáilte Ireland

Ann Kilmartin

From: planning applications <planning.applications@failteireland.ie> on behalf of planning applications
Sent: Monday, November 23, 2020 12:48 PM
To: Ann Kilmartin
Subject: RE: 6226 Inchamore Wind Farm, Co. Cork
Attachments: Fáilte Ireland EIAR Guidelines.pdf

Hello Ann,

Thank you for sending Fáilte Ireland the Scoping Letter/information regarding the preparation of an Environmental Impact Assessment for Inchamore Wind Farm, Coolea, Co Cork.

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

Regards,

Yvonne

Yvonne Jackson

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



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From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Monday 16 November 2020 10:07
To: Reception <ReceptionAmiensStreet@failteireland.ie>; planning applications <planning.applications@failteireland.ie>
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6226 Inchamore Wind Farm, Co. Cork

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Dear Sirs,

Please find attached Scoping Letter in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,



Fáilte Ireland
National Tourism Development Authority

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



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

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

Phone 1890 525 525
or +353 1 884 7700
Email info@failteireland.ie
www.failteireland.ie

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1. Introduction

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

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

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

2. Background to this Document

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

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

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

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

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

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

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

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

3. Legislation and Statutory Guidance

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

Legislation

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

Statutory Guidance

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

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

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

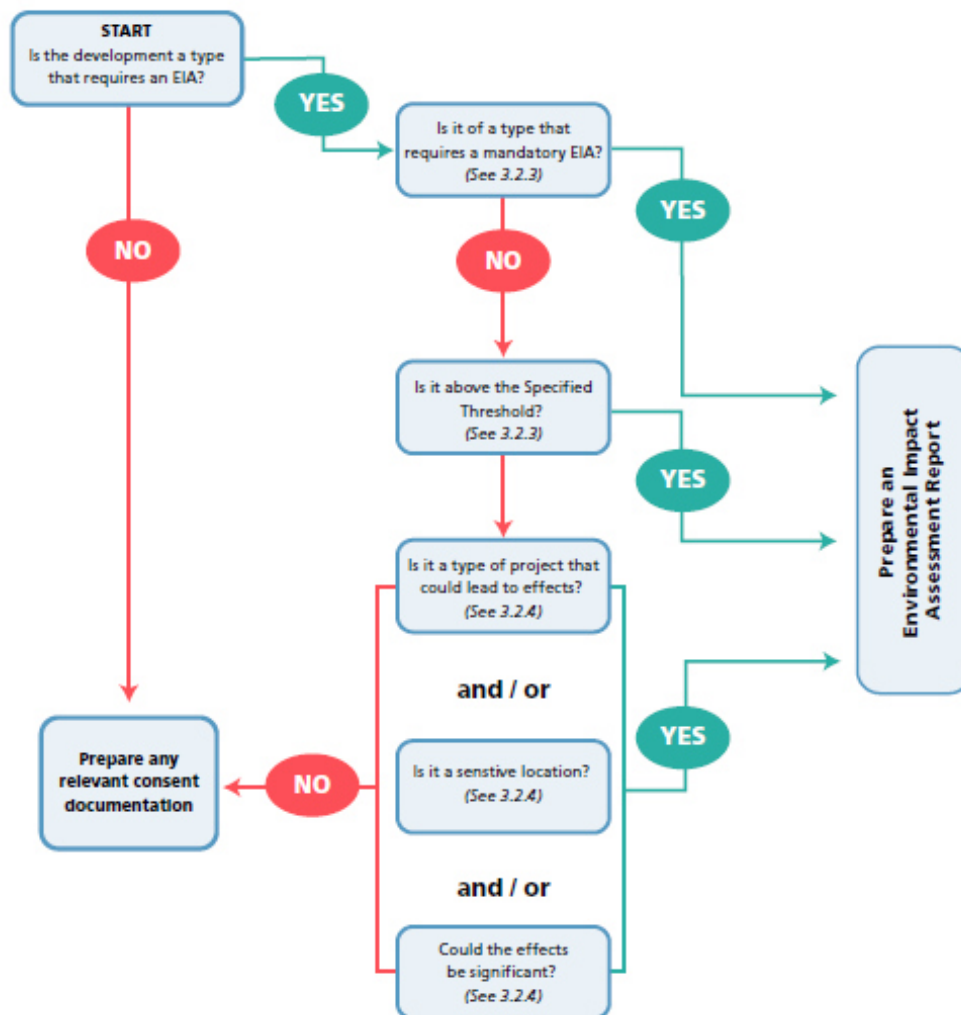
Screening

Through EIAR Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which do not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule

but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised below in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there will still be a requirement for an EIAR for that development.

EIAR Scoping

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

4. Assessing Tourism

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is *"Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities"*. This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

Projects which involve a tourism element

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious - forest trails, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element have potential particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

Projects which may have an impact upon tourism

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2018 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture
- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

5. Guiding Principles of EIAR

As outlined in the EPA Draft EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

6. Consideration of Competency and Qualifications

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by 'competent experts'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (eg. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

7. EIAR Requirements

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;

- baseline assessment;
- impact assessment;
- cumulative impact
- interaction of impacts
- mitigation.

Project Description

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

Assessment of Alternatives

The assessment of alternatives is a requirement of EIAR

Where tourism projects are location dependent the assessment of alternatives should consider alternative methods and technologies, detail the key considerations culminating in the selection of the design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The developer is expected to consider reasonable alternatives. What is considered reasonable may vary from case to case.

Baseline Assessment

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependant on its **Context, Character, Significance, and Sensitivity**, as outlined in the Draft Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or

recognition of such significance should be. Where possible the value of the contribution of such tourism assets and activities to the local economy should be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

Impact Assessment

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the Draft Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism assets under the 'material assets' topic below.

Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section.

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impact. Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc. Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

Air Quality and Climate

Tourism impact upon air quality is dependent on activity proposed and sensitivity of the location.

Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor but is generally not kept in situ except in key cases which could also be considered under cultural heritage.

Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

Material Assets

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

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A

development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

Interaction of Effects

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIAR Screening Report.

Mitigation

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy

Avoid sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

Reduce the exposure of sensitive resources to excessive environmental impact

Reduce the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

Remedy any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

Cumulative Impact

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

Transboundary Impact

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

Tourism Ireland

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

Local Authorities

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

Regional Authorities

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

Central Statistics Office

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

Health Service Executive



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: 10th December 2020

Name: Ms Sarah Moore, Jennings O'Donovan & Partners Limited, Finisklin
Business Park, Sligo

Consultant's reference: 6225/503/SL/001/SM

Re: EIA Scoping Report

Proposed development: Proposed Gortyrhilly Wind Farm, Ballingeary, Co. Cork

Applicant: Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte CGA) and
SSE Renewables Ltd

EHIS Reference: 1451

Dear Ms Moore

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 16 November 2020

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

A handwritten signature in black ink that reads "Catherine McCarthy".

Catherine McCarthy
Principal Environmental Health Officer

HSE EIA Scoping

Environmental Health Service Submission Report

Date: 10.12.20

Our reference: EHIS 1451

Report to: Ms Sarah Moore, Jennings O'Donovan & Partners Limited, Finisklin
Business Park, Sligo

Type of Consultation: EIA Scoping

Proposed development: Proposed Gortyrhilly Wind Farm, Ballingearry, Co. Cork

Applicant: Coillte Cuideachta Ghníomhaíochta Ainmnithe (Coillte CGA) and SSE Renewables Ltd

Proposed Development: Coillte CGA and SSE Renewables Ltd. intends to apply for SID approval for the construction of approximately 16 No. wind turbines each typically 4.5-6 megawatts (MW) with a combined output of approximately 80MW located between the villages of Ballyvourney and Ballingearry in the Múscraí Gaeltacht, Co. Cork. The development will also include planning permission for the construction of an underground grid connection to Ballyvouskill 220Kv substation, Co. Cork located approximately 14km to the north east of the development.

General Introduction

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

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

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

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

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

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

<http://www.epa.ie/pubs/consultation/reviewofdraftteisguidelinesadvicenotes>

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

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

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

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

The HSE will consider the final EIAR accompanying the SID/ planning application and will make comments to An Bord Pleanála and Cork County Council 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 12 November 2020.

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

- Public Consultation
- Decommissioning phase
- Siting and location of turbines
- Opportunity for Health Gain

- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Geological Impacts
- Ancillary facilities
- Cumulative impacts

Public Consultation

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

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

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

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

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

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

Decommissioning Phase

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

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

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

Siting, Location and details of Turbines

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

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

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

Opportunity for Health Gain

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

Assessment of Consideration of Alternatives

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

Noise & Vibration

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

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

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

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

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

Shadow Flicker

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

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

Air Quality

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

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

Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

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

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

Geological impacts

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

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

The Environmental Health Service recommends that a detailed Peat Stability Assessment should be undertaken to assess the suitability of the soil for the proposed development. The EIAR should include provision for a peat stability monitoring programme to identify early signs of potential bog slides ('pre-failure indicators' see the Scottish Government's 'Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Developments 2017)

<https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2017/04/peat-landslide-hazard-risk-assessments-best-practice-guide-proposed-electricity/documents/00517176-pdf/00517176-pdf/govscot%3Adocument/00517176.pdf>

Ancillary Facilities

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

Cumulative Impacts

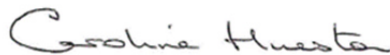
All existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

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

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



Shane O'Flynn and Máiread Coughlan
Environmental Health Officers
HSE South
North Lee Environmental Health Service
Floor 2, Block 1,
St. Finbarr's Hospital,
Douglas Road,
Cork



Caroline Hueston
Environmental Health Officer
Environment Operational Unit
HSE West
Ennistymon Health Centre
Ennistymon
Co. Clare



| HSE South Emergency Management Consultation Report | | | |
|---|--|-------------|-----------------------------------|
| Report to | Catherine McCarthy, PEHO, Cork | Date | 17th Nov., 2020 |
| Type of consultation: EIS <input type="checkbox"/> Scoping X <input checked="" type="checkbox"/> Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/> | | | |
| Other (please specify): | | | |
| Authority | Health Service Executive | | |
| Authority Reference Number | EHIS 1451 | | |
| EM Reference Number | EMENV 066 | | |
| Applicant | Jennings O'Donovan & Partners, Cons. Eng., Finisklin Business Park, Sligo, on behalf of Coillte CGA and SSE Renewables Ltd. | | |
| Proposal | The Construction of 16 No. wind turbines and associated site works at Gortyrähilly Wind Farm, Ballingearry, Co. Cork | | |

HSE South Emergency Management Observations:

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

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

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



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

WHEN YOU ARE CONNECTED TO THE REQUISITE SERVICE(S)

GIVE THE FOLLOWING INFORMATION

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

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

| | |
|----------|--|
| E | |
| | Exact location of the incident |
| T | |
| | Type of incident, e.g.; fire, explosion, gas leak, etc |
| H | |
| | Hazards – current and potential |
| A | |
| | 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 |
| E | |
| | The emergency services present and required |

R.V.P.
No.1

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

Irish Water



Jennings O'Donovan & Partners,
Finisklin Business Park,
Sligo,
F91 RHH9

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Irish Water
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T: +353 01 89 25000
T: +353 01 89 25001
www.water.ie

14th September 2021

Re: EIAR Scoping Request – Gortyrhilly Wind Farm, in Co. Cork

Dear Ms Kilmartin,

Irish Water (IW) has received notification of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for the proposed Wind Farm Development in Co. Cork.

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

Queries relating to the terms and observations above should be directed to planning@water.ie

Yours sincerely,

Signed on behalf of Irish Water:

PP: Ali Robinson

Yvonne Harris
Connections and Development Services

Response to EIAR Scoping Report Requests

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

- a) Where the development proposal has the potential to impact an IW Drinking Water Source the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to IWs Drinking Water Source during construction and operational phases of the development. It is a requirement of the Water Framework Directive that waters used for the abstraction of drinking water are protected so as to avoid deterioration in quality.
- b) The waste sampling strategy for the proposed development to ensure the material is inert.
- c) Mitigation proposed for any potential negative impacts on any water source(s), in proximity including the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source is assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- f) Any up-grading of water services infrastructure that would be required to accommodate the development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- i) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets
- j) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance

Survey map identifying the proposed location of your intended development to datarequests@water.ie. Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.

- k) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- l) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence/ present a risk to the quality of the water abstracted by IW for public supply.
- m) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- n) Mitigation measures in relation to any of the above ensuring zero risk to any IW drinking water sources (Surface and Ground water).

This is not an exhaustive list.

Please note

- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.
- Irish Water will not accept new surface water discharges to combined sewer networks

Ann Kilmartin

From: INFO <Information@tii.ie>
Sent: Monday, December 7, 2020 12:21 PM
To: 'smoore@jodireland.com'
Subject: EIAR Scoping - Gortyrahilly Wind Farm, Ballingearry, Co. Cork. TII Ref: TII20-111739.

Dear Ms. Moore,

Thank you for your correspondence of 13 November 2020 regarding as EIAR Scoping request for Gortyrahilly Wind Farm, Ballingearry, Co. Cork. The position in relation to your enquiry is as follows.

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

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

With respect to EIAR Scoping issues, the recommendations indicated below provide only general guidance for the preparation of EIAR, which may affect the National Roads Network. The developer should have regard, inter alia, to the following:

- Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to locations of existing and future national road schemes in the vicinity of the subject development site.
- TII would be specifically concerned as to potential significant impacts the development would have on the existing national road network (and junctions with national roads) in the proximity of the proposed development.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the areas concerned. The developer should, in particular, have regard to any potential cumulative impacts.
- The developer, in preparing 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 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. TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to proposed development, with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the TII TTA Guidelines, which addresses requirements for sub-threshold TTA.

- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- In relation to haul route identification, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route, including where temporary modification to the road network may be required. Consultation with relevant PPP Companies and MMarC Contractors may also be required. All structures on the haul route should be checked by the applicant/developer, to confirm their capacity to accommodate any abnormal load proposed.
- Where the windfarm scheme includes grid connection proposals, the scheme promoter should note locations of existing and future national road schemes and develop proposals, to safeguard proposed road schemes. In the context of existing national roads, alternatives to the provision of cabling along the national road network, such as alternative routing or the laying of cabling in private lands adjoining the national road, should be considered in the interests of safeguarding the investment in and the potential for future upgrade works to the national road network. The cable routing should avoid all impacts to existing TII infrastructure, such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII. Any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network and/or motorway network where applicable.

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

I hope that this information is of assistance to you.

Yours sincerely,

Alban Mills

Senior Regulatory and Administration Executive



Transport Infrastructure Ireland

Parkgate Business Centre

Parkgate Street

Dublin D08 DK10



**Jennings O'Donovan
Consulting Engineers
Finisklin Business Park
Sligo
F91 RHH9**

OPW Ref: **332-2021**
Your Ref: 6225/503/SL/009/SM

**Scoping Opinion in relation to Proposed Windfarm at Gortyrhilly Wind Farm,
Ballingeary, Co. Cork.**

Dear Sir or Madam,

I refer to your letter dated 12th November 2020 in relation to the above project seeking comments or observations from this office. Please accept our apologies for not replying before now.

We would make the following comments.

If any new culverts or bridges (or modifications to any existing culverts or bridges) are required to cross watercourses as part of the development or on proposed or existing access roads to serve or access the development, you should be aware that these require consent from the Commissioners of Public Works. This is a requirement of Section 50 of the Arterial Drainage Act of 1945 as amended.

I attach a copy of our brochure on obtaining Section 50 consent for your information. Further information on the process including copies of the appropriate application form and brochure are available on our website at <https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/>

Please note that, in the context of seeking consent under Section 50, the current required design standard for bridges or culverts is based on the flood with an annual exceedance probability of 1% (often referred to as the 100-year flood), increased by 20% to cater for the effects of Climate Change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse – further details on this issue are available in the brochure and can be clarified depending on the circumstances of any particular proposed bridge or culvert.

You should be aware that a grant of Planning Permission by a planning authority for a development which contains bridges or culverts does not confer section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.



With regard to the proposed Grid Connection Route, which is not indicated in your documentation, it is possible that this route will cross several watercourses. If the cable and ducting are to be buried in the road, as they cross bridges over the watercourses, and there is no interference with the opening in the bridge spanning the watercourse, then there is no issue. On the other hand, if it is proposed to pass the cable in its ducting through the opening of any bridge or culvert, this would be considered to be a modification of a bridge and it would require the consent of the Commissioners under Section 50 as mentioned above. Similarly, if it is proposed to carry the cable in its ducting across watercourses on new support structures spanning the watercourses, these should be treated as if they are bridges, and the consent of the commissioners under Section 50 should be obtained. If the cable and ducting is to be buried under the natural bed of the watercourses being crossed, Section 50 would not apply, and we would recommend that the duct be buried a sufficient distance below the natural bed to allow for erosion and mobility of the streambed.

We would recommend that a flood risk assessment be carried out with regard to the proposed development and its construction. This should consider all sources, pathways and receptors of flood risk. This should be carried out in accordance with the principles set out in the guideline document “The Planning System and Flood Risk Management” as published by the Minister for the Environment, Heritage and Local Government and the Office of Public Works. Please be aware that this is a separate issue from the requirement to obtain Section 50 consent as mentioned above.

In terms of the preparation of an EIA, the matters referred to above principally relate to the Hydrology Section, and the Risk of Flooding on a development such as this can impact on Landscape (e.g. landslides that have been reported in recent years), Infrastructure (roads and bridges) and people and their homes, among other things. The aim of the Section 50 process, and the Flood Risk Assessment, which is recommended, would be to mitigate any increased risk of flooding and the consequences of same, as arising from the proposed development.

Please use the reference number indicated above in any further correspondence with the office on this matter.

Yours sincerely,

Karen Donovan
Engineering Services Administration Unit
22nd September 2021

Ann Kilmartin

From: Údarás na Gaeltachta <eolas@udaras.ie> on behalf of Údarás na Gaeltachta
Sent: Friday, November 13, 2020 4:00 PM
To: Ann Kilmartin
Subject: RE: 6225 Gortyrähilly Wind Farm, Co. Cork

Ann, a chara,

Go raibh maith agat as ucht do theachtaireacht.

Thank you for your correspondence which is acknowledged herein.

I have forwarded your correspondence to our Northern Regional Office & Community Development Division for their attention and direct reply.

Mise, le meas
An Rannóg Cumarsáide

From: Ann Kilmartin <akilmartin@jodireland.com>
Sent: Friday 13 November 2020 15:07
To: Dnag Suiomh Idirlión <DnagSuiomhIdirlión@udaras.ie>
Cc: Sarah Moore <smoore@jodireland.com>
Subject: 6225 Gortyrähilly Wind Farm, Co. Cork

Dear Sirs,

Please find attached Scoping Letter in relation to the above mentioned project for your consideration.

We would be grateful if you could revert with any comments you may have on the proposed development at your earliest convenience.

Thanks and kind regards,

Ann Kilmartin



Head Office

Finisklin Business Park, Sligo, Ireland, F91 RHH9. [MAP](#)

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