



APPENDIX 2-1

SCOPING RESPONSES

Niamh McHugh

From: Customer Service <Customer.Service@tcagsm.gov.ie>
Sent: Friday 6 August 2021 14:08
To: Ellen Costello
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - DoTCAGSM

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms Costello,

Thank you for contacting Customer Service.

As per transfer of functions which took place in November your query would no longer fall under the remit of this Departments but under the Department of Local Government, Housing and Heritage.

They can be contacted at qcsofficer@housing.gov.ie or on 01-888 2000.

Kind regards,

Ashling OConnor
Customer Services

An Roinn Turasóireachta, Cultúir, Ealaíon, Gaeltachta, Spóirt agus Meán
The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media
23 Sráid Chill Dara, Baile Átha Cliath2, D02 TD30
23 Kildare Street, Dublin 2, D02 TD30

From: Ellen Costello [mailto:ecostello@mkoireland.ie]
Sent: Friday 6 August 2021 13:34
To: Customer Service <Customer.Service@tcagsm.gov.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - DoTCAGSM

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

MKO

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



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Tá an t-eolas sa ríomhphost seo faoi rún, chomh maith le gach comhad atá ceangailte leis, agus i gcomhair úsáid an duine nó an chórais a bhfuil sé dírithe air amháin. Má fhaigheann tú an ríomhphost seo trí bhotún, cuir scéal chugainn ag webmaster@chg.gov.ie. Tá an ríomhphost seo arna sheiceáil ag scanóir víreas agus dealramh air go bhfuil sé glan.

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Niamh McHugh

From: Roger Woods <rwoods@bai.ie>
Sent: Monday 9 August 2021 09:36
To: Ellen Costello
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - BAI

Hi Ellen

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: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 12:23
To: Roger Woods <rwoods@bai.ie>
Subject: 201050 Ballynacorra Renewable Energy Development Scoping Document - BAI

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

MKO

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+353 (0) 91 735611
www.mkoireland.ie



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Niamh McHugh

From: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Sent: Tuesday 10 August 2021 10:47
To: Ellen Costello
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - DAFM
Attachments: Ballynacorra Energy Development Co Westmeath.pdf

You don't often get email from environmental_co-ordination@agriculture.gov.ie. [Learn why this is important](#)

Good morning Ellen,

Please see comments attached from our Felling Division.

Regards

Breeda

Breeda Hennebry | *Clerical Officer, An tAonad um Chomhordú Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithfhuinnimh,*
Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division | environmentalco-ordination@agriculture.gov.ie
An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine
Lárionad Gnó Grattan, Bóthar Bhaile Átha Cliath, Port Laoise, Co Laoise, R32 K857
Grattan Business Centre, Dublin Road, Portlaoise, Co. Laoise, R32 K857
T +353 (0)57 868 9914
www.agriculture.gov.ie

From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 12:30
To: Environmental Co-ordination (Inbox) <Environmental_Co-ordination@agriculture.gov.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - DAFM

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Dear Sir or Madam,

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

Kind regards,

Ellen



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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

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

09/08/2021

MKO,
Tuam Road,
Galway,
H91 VW84,

Re: **E.I.A.R. Scoping Request for the proposed Renewable Energy Development in Ballynacorra and adjacent townlands in County Westmeath and Roscommon.**

Dear Sir/Madam,

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

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

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

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

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

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

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);
2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices for 2020 are published online at:
<https://www.agriculture.gov.ie/forests-service/publicconsultation/environmentalimpactassessment-2020registerofdecisions/>
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 28 days to the Forestry Appeals Committee. Felling Licence decisions for 2020 are published online at:
<https://www.agriculture.gov.ie/forests-service/publicconsultation/environmentalimpactassessment-2020registerofdecisions/>

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,

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

and

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

Yours sincerely,

Tara Hendley

Tara Hendley

Felling Section

Department of Agriculture, Food and the Marine

Johnstown Castle

Co Wexford

Niamh McHugh

From: Manager DAU <Manager.DAU@housing.gov.ie>
Sent: Monday 9 August 2021 12:17
To: Ellen Costello
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - DoHLGH

You don't often get email from manager.dau@housing.gov.ie. [Learn why this is important](#)

Our Ref: G Pre00210/2021 (Please quote in all related correspondence)

A Chara

I acknowledge receipt of your recent consultation.

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

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

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

Regards
Diarmuid

Diarmuid Buttimer
Executive Officer

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

Development Applications Unit

Oifigí an Rialtais
Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

—
Diarmuid.Buttimer@housing.gov.ie
Manager.DAU@housing.gov.ie

From: Housing Qcsofficer [mailto:qcsofficer@housing.gov.ie]
Sent: Monday 9 August 2021 09:37
To: Manager DAU <Manager.DAU@housing.gov.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document -DoHLGH

Dear Manager,

Please see the request below for a pre-application consultation plus attached documents in connection with proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

Kind regards,
Naomi

Naomi Donaldson
Communications

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

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

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

From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 12:50
To: Housing Qcsofficer <qcsofficer@housing.gov.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document -DoHLGH

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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

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

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Niamh McHugh

From: MKO-Admin
Sent: Monday 16 August 2021 16:04
To: Ellen Costello
Subject: Scoping: Proposed Renewable Energy Development in the townland of Ballynacorra and adjacent townlands in County Westmeath and County Roscommon Ref: 201050

From: RAFFERTY Audrey <audrey.rafferty@iaa.ie>
Sent: Monday 16 August 2021 16:03
To: MKO-Admin <info@mkoireland.ie>
Subject: Proposed Renewable Energy Development in the townland of Ballynacorra and adjacent townlands in County Westmeath and County Roscommon Ref: 201050

You don't often get email from audrey.rafferty@iaa.ie. [Learn why this is important](#)

Dear Sir / Madam

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

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

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

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

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

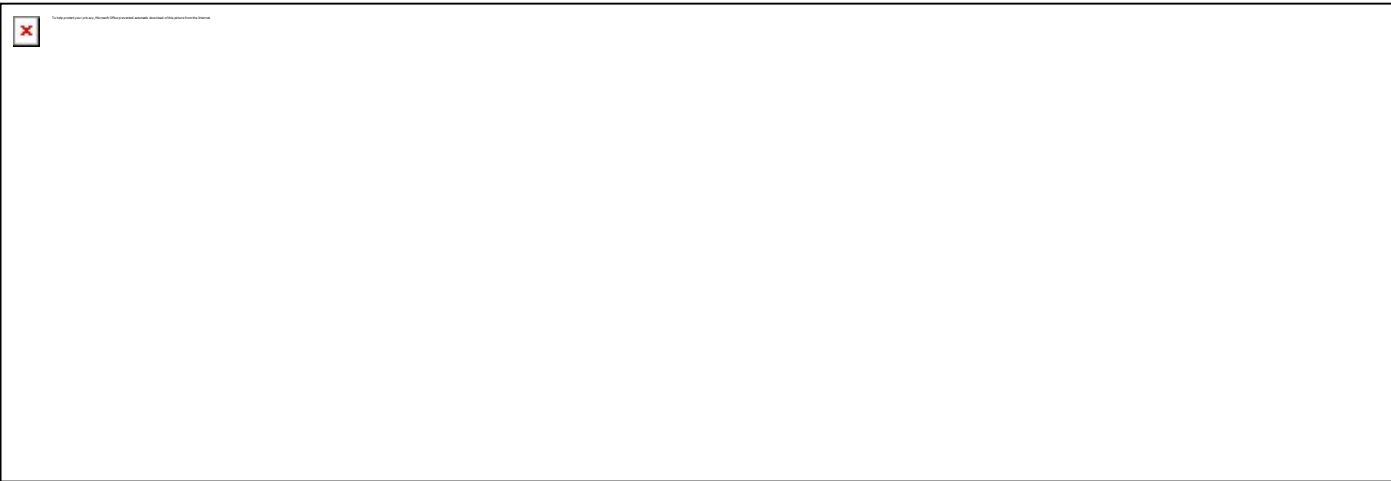
ICAO Light Type	Colour
Low-intensity Type A (fixed obstacle)	Red
Low-intensity Type B (fixed obstacle)	Red
Low-intensity Type C (mobile obstacle)	Yellow/Blue
Low-intensity Type D (follow-me vehicle)	Yellow
Low-intensity Type E	Red

Medium-intensity Type A	White
Medium-intensity Type B	Red
Medium-intensity Type C	Red
High-intensity Type A	White
High-intensity Type B	White

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

Kind regards,

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



=====

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=====

=====

Niamh McHugh

From: MKO-Admin
Sent: Wednesday 18 August 2021 15:15
To: Ellen Costello
Subject: FW: Ballynacorra Renewable Energy Development - your ref 201050
Attachments: IMG_7365.jpg

From: Colin Hedderly <Colin.Hedderly@irishrail.ie>
Sent: Wednesday 18 August 2021 14:38
To: MKO-Admin <info@mkofireland.ie>
Subject: Ballynacorra Renewable Energy Development - your ref 201050

You don't often get email from colin.hedderly@irishrail.ie. [Learn why this is important](#)

FAO Ellen Costello

Dear Ms Costello,
I reply to the letter attached of 6th August 2021. This proposed development is remote from the railway line and therefore does not concern Iarnród Éireann.

Should the grid connection for the proposed development be planned to cross railway property then the developer must enter into a wayleave agreement with Iarnród Éireann and CIÉ for all crossings. It is unclear from the documents submitted what route the grid connection is planned to take and whether it does cross any railway property.

Regards,

Colin Hedderly

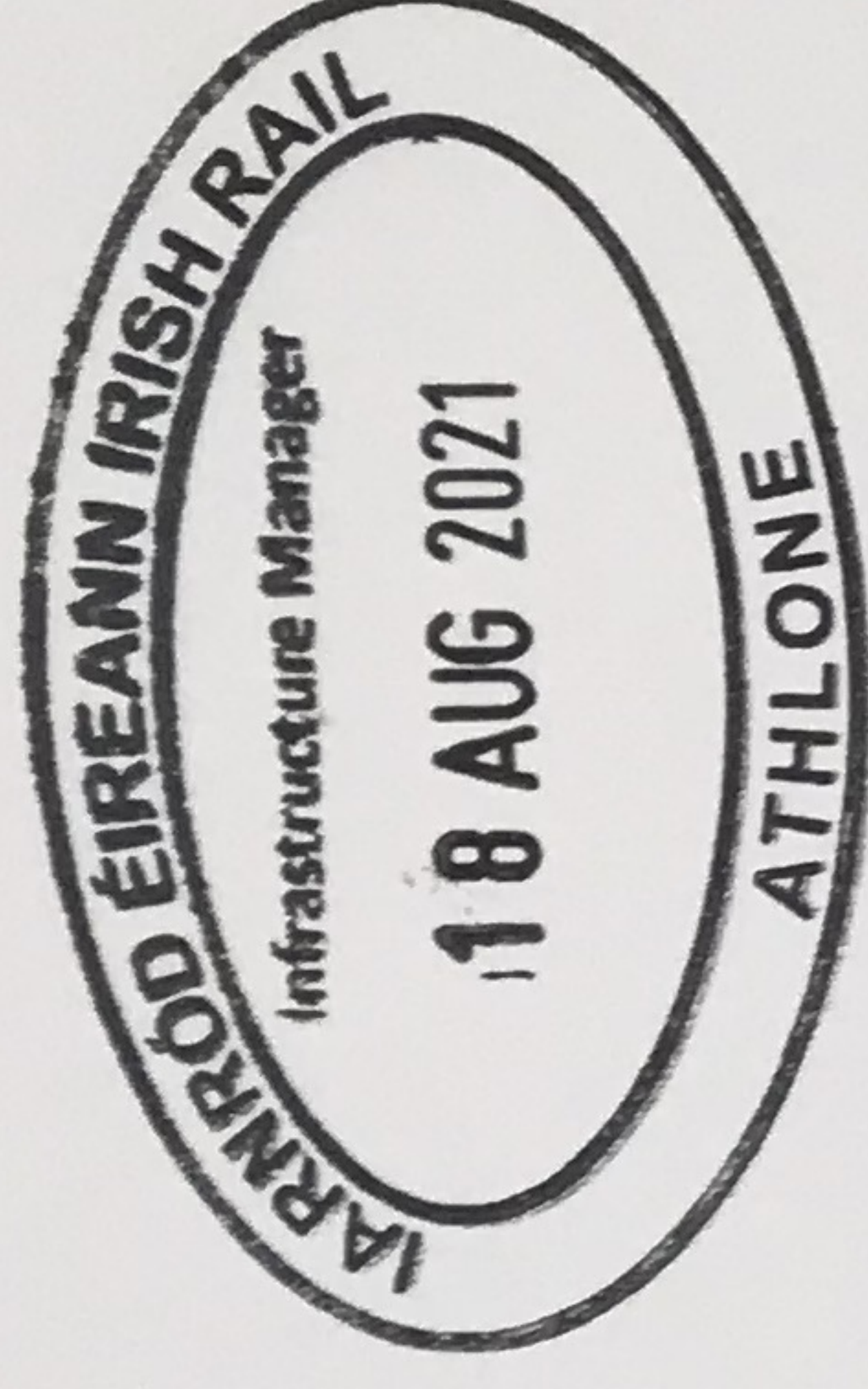
Senior Track & Structures Engineer, Iarnród Éireann/Irish Rail, CCE Dept, Old Railway Station, Grace Road, Athlone, Co. Westmeath, N37 C573.

Mobile: 087 9681735 E-mail: colin.hedderly@irishrail.ie



*Iarnród Éireann Irish Rail, cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, cláraithe in Éirinn ag Stáisiún Uí Chonghaile, Baile Átha Cliath 1, Ur. 119571 Ur. CBL: IE 4812851 O,
Iarnród Éireann Irish Rail, a designated activity company, limited by shares, registered in Ireland at Connolly Station, Dublin 1, No. 119571 VAT No. IE 4812851 O*

*In Iarnród Éireann, creideann muid in obair sholúbtha a éascú, agus mar sin, cé go n-oireann sé dom ríomhphost a sheoladh anois, níl mé ag súil le freagra ná gníomh lasmuigh de d'uaireanta oibre.
At Iarnród Éireann we believe in facilitating flexible working, so while it suits me to email now, I do not expect a response or action outside of your own working hours.*



Sir or Madam
Infrastructure Manager's Office
Iarnród Éireann
Old Railway Station
Grace Road
Athlone
Co. Westmeath

Our Ref: 201050

Your Ref:

6th August 2021

Re: EIA Scoping Document for the Proposed Renewable Energy Development in the townland of Ballynacorra and adjacent townlands in County Westmeath and County Roscommon

Dear Sir or Madam,

Ballynacorra Ltd is investigating the potential for a proposed renewable energy development at Ballynacorra and adjacent townlands, located in County Westmeath and County Roscommon. McCarthy Keville O'Sullivan Ltd. (MKO) has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the proposed renewable energy development. The proposed study area measures approximately 487 hectares and is located approximately 12 kilometres northeast of Athlone, Co. Westmeath and approximately 7 kilometres north of Moate Co. Westmeath.

It is envisaged that the proposed renewable energy development will comprise approximately 9 No. wind turbines, a 110kV substation, hardstands, access roads and entrance(s), borrow pit(s), a temporary construction compound, and a permanent anemometry mast located in Co. Westmeath, and grid connection to Athlone 110kV substation, located in Co. Roscommon, via an underground grid connection route.

An application will be made to An Bord Pleanála (Board) seeking a determination in relation to the Strategic Infrastructure Development (SID) status, or otherwise, of the proposed wind energy development. If the Board determine that the development is indeed SID, the planning application will be submitted directly to An Bord Pleanála, under the provisions of Planning and Development (Strategic Infrastructure) Act 2006. Should the project be of a scale lower than the SID thresholds, applications for planning permission will be made to Westmeath County Council and Roscommon County Council.

As part of the EIA process, we would welcome any comments that you might have in relation to the proposed project, including baseline data, survey techniques or potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR. In order to facilitate this, a Scoping Document providing details of the proposed project and the site of the proposed development is enclosed with this letter.

If you could return any comments or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Yours sincerely,

Ellen Costello MSc.
Environmental Scientist
McCarthy Keville O'Sullivan Ltd



MKO, Tuam Road, Galway, Ireland. H91 VW84
+353 (0)91 735611 | info@mkoireland.ie | www.mkoireland.ie | [@mkoireland](https://twitter.com/mkoireland)
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Niamh McHugh

From: planning applications <planning.applications@failteireland.ie>
Sent: Friday 20 August 2021 14:31
To: Ellen Costello
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - Failte Ireland
Attachments: Fáilte Ireland EIAR Guidelines.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Hello Ellen,

Thank you for your email regarding the Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath

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

Regards,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86

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Please consider the environment before printing this email

From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 12:54
To: planning applications <planning.applications@failteireland.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - Failte Ireland

[ATTENTION] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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Fáilte Ireland
National Tourism Development Authority

EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



An tÚdarás Náisiúnta Forbartha Turasóireachta
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Éire

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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.

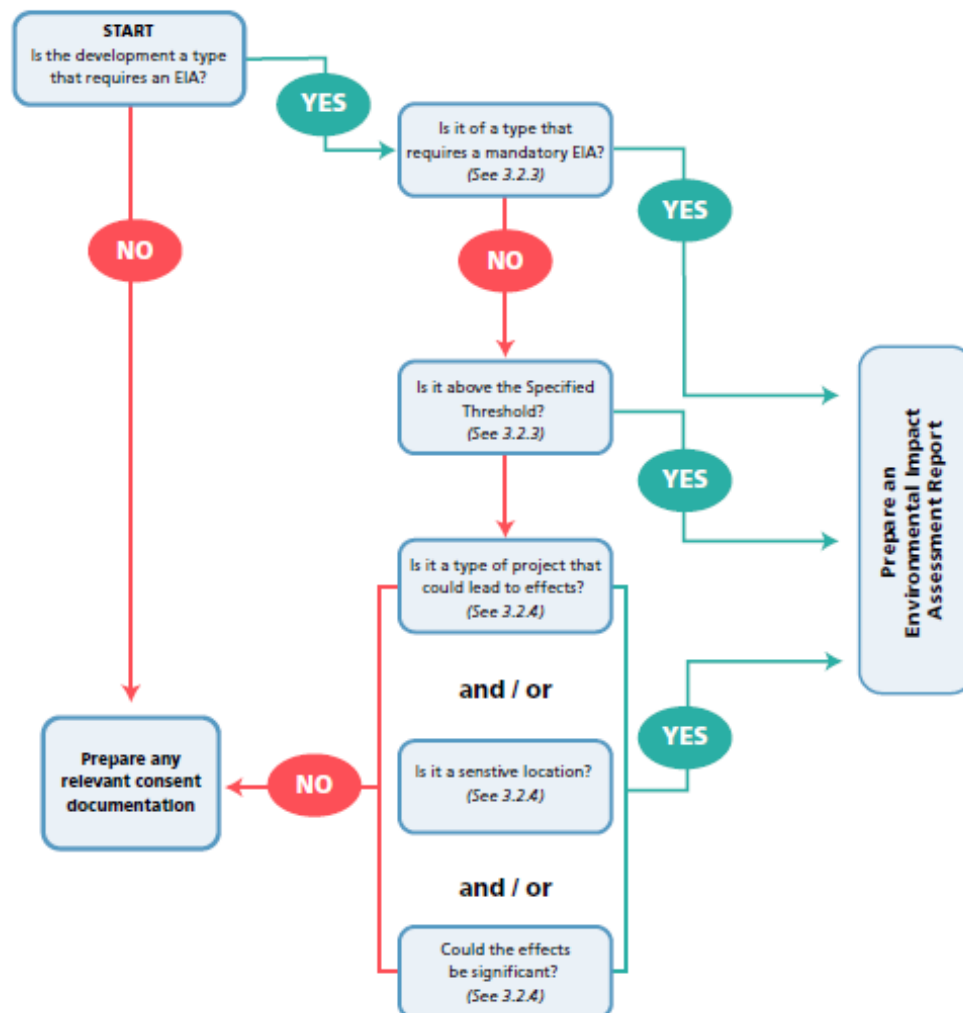
Screening

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.

Niamh McHugh

From: CorporateSupport.Unit <CorporateSupport.Unit@decc.gov.ie>
Sent: Friday 27 August 2021 15:13
To: Ellen Costello
Cc: CorporateSupport.Unit
Subject: Reply from DECC re EIS 21/296 Wind energy development at Ballynacorra, Co. Westmeath
Attachments: 21_296 Wind energy development at Ballynacorra Co. Westmeath.pdf; GSI datasets relevant to EIA & SEA_20210421.pdf; 201050 - Ballynacorra Scoping Cover Letter - 2021.08.06 - DECC.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon,

Please see attached and below a reply from Ms. Trish Smullen and Dr Clare Glanville (Senior Geologist) on behalf of Geological Survey Ireland, (a division of the Department of Environment, Climate and Communications) for the subject below.

Please forward an acknowledgment of receipt to CorporateSupport.Unit@decc.gov.ie at your earliest convenience. I have attached your letter of 06/08/2021 for reference.

Regards,
Enda Brady,
Corporate Support Unit,
Department of Environment, Climate and Communications.

From: GSI Planning
Sent: 27 August 2021 13:50
To: CorporateSupport.Unit
Cc: Clare Glanville; GSI Planning
Subject: Re: EIS 21/296 Wind energy development at Ballynacorra, Co. Westmeath

Hi Enda,
Please see attached for return to MKO.
Thanks and regards,
Trish

From: GSI Planning
Sent: 06 August 2021 14:44
Cc: GSI Planning
Subject: EIS 21/296 Wind energy development at Ballynacorra, Co. Westmeath

EIS 21/296

Wind energy development at Ballynacorra, Co. Westmeath.

Request for observations by MKO for return via the CSU Mailbox.
Letter and scoping document attached.

Regards,

Trish

From: Ellen Costello [mailto:ecostello@mkofireland.ie]
Sent: 06 August 2021 12:31
To: CorporateSupport.Unit
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - DEEC

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

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



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



Ellen Costello
MKO
Tuam Road
Galway
H91 VW84

27 August 2021

Re: EIA Scoping Document for the Proposed Renewable Energy Development in the townland of Ballynacorra, County Westmeath

Your Ref: 201050

Our Ref: 21/296

Dear Ellen,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our [website](#) for data availability. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your letter dated 06 August 2021, concerning the Proposed Renewable Energy Development in the townland of Ballynacorra, County Westmeath, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

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

County Geological Sites (CGSs), 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 Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audit for Co. Westmeath was carried out in 2019. The full report details can be found at [The Geological Heritage of County Westmeath](#). **Our records show that there is a CGS located close to the eastern boundary of the proposed development.**

Calliaghstown-Milltown Esker, Co. Westmeath (GR 219147, 249887), under IGH theme: IGH 7 Quaternary. This Esker comprises a long, linear series of esker sand and gravel segments deposited under the ice sheet as the ice withdrew northwards across north Westmeath at the end of the last Ice Age. The feature is a high, striking example of a dry sand and gravel ridge, and stands proud of the surrounding landscape. This esker and the associated sands and gravels in the locality seem to be a good example of a deglacial, meltwater-deposited complex, with portions deposited under the ice (esker), and portions at the ice margin (fans). Link to Site Report: [WH002](#).



Ideally, the site should not be damaged or integrity impacted or reduced in any manner, for example due to the construction of any access roads and from traffic due to access road construction and/or turbine installation. Please contact Clare Glanville (Clare.Glanville@gsi.ie) for further information and possible mitigation measures if applicable.

Groundwater

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

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

The Groundwater Data Viewer indicates a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlies the proposed wind farm development. The Groundwater Vulnerability map indicates the area covered is classed as 'High' Vulnerability.

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

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Geotechnical Database Resources

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

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. 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.

Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).



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

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and lithogeochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

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, Geological 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 Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

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

Niamh McHugh

From: Lawlor, Tara <tara.lawlor@hse.ie>
Sent: Monday 6 September 2021 12:31
To: Ellen Costello
Subject: Ballynacorra Wind Farm 2021 Scoping.doc
Attachments: Ballynacorra Wind Farm 2021 Scoping.doc

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from tara.lawlor@hse.ie. [Learn why this is important](#)

Please find attached comments from the Environmental Health Department in respect of the above project.

Regards,
Tara

Tara Lawlor,
Environmental Health Officer,
HSE-Dublin-Mid Leinster,
Primary Care Centre,
Clonbrusk,
Athlone,
Co. Westmeath.
090-6424864
tara.lawlor@hse.ie

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

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

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Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive



Environmental Health Service,
7A Lough Sheever Corporate Park,
Robinstown,
Mullingar,
Co. Westmeath

MKO Consultants
Tuam Rd
Galway
Ireland
H91 VW84

September 6th 2021

Re: HSE SCOPING SUBMISSION REPORT

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above proposal. The following HSE departments were notified of the consultation request for this development on 11th August 2021.

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/Helen Mulcahy
- CHO – Des O'Flynn

This report only comments on Environmental Health impacts of the scoping request. If you have any queries regarding this report the contact is Paul McGuinness, PEHO, 7A Lough Sheever Corporate Park, Robinstown, Mullingar, Co. Westmeath.

Yours sincerely,

Paul McGuinness PEHO

Principal Environmental Health Officer



idhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service
7A Lough Sheever Corporate Park
Robinstown
Mullingar
Co. Westmeath

HSE EIS SCOPING REPORT

Environmental Health Service Consultation Report
(as a Statutory Consultee (Planning and Development Acts 2000,
& Regs made thereunder)).

Date: 27th August 2021

Type of consultation: Scoping

Planning Authority: Westmeath Co. Council, Roscommon Co. Council

EHIS Reference: 1907

Applicant: Ballynacorra Ltd

Proposed Development: Proposed renewable energy development at Ballynacorra and adjacent townlands, Co. Westmeath.

It is envisaged that the proposed renewable energy development will encompass approximately 9 no. wind turbines located in Co. Westmeath and grid connection to Athlone 110kV, located in Co. Roscommon, via an underground grid connection cable route.

This report only comments on Environmental Health impacts of the proposed development. The EHS have made observations on the following specific areas:

Description of the Project:

The EIAR must fully describe the characteristics and construction of the project and the reasons for proposing same. It should also describe the existing physical environment and detail any potential impacts on the existing environment both during the construction and operational phase of the project.

Later Consents Required:

Information on possible future monitoring requirements for the operation of the wind farm should be included in the EIAR.

Consideration of Alternatives:

The EIAR should fully describe and consider any alternatives to this project. The applicant should outline a rationale for site selection and proposed individual turbine location and design. It is noted that mapping of the constraints and facilitators for the windfarm will be carried out and documented as part of the EIA process.

Public Consultation:

The EIAR should describe measures the applicant shall take to inform the public about the project. I could not locate details of proposals for public consultation in the scoping report. It is noted that the applicant proposes to have a minimum set-back distance of 500 metres between the proposed turbines and occupied dwellings / identified sensitive receptors.

Details of feedback from the public regarding the proposal should be included within the EIAR, possibly within the constraints mapping. Public consultation should be a two way process between the applicant and the public. The EIAR should clearly demonstrate how the legitimate concerns of the public have been assessed and evaluated and how the outcome of consultation with the public influenced decision making within the EIA.

Noise:

A full and thorough noise survey must be carried out to assess the impact of noise from the proposed turbines on the residents living in the vicinity.

It is essential that up to date baseline monitoring is carried out to establish the existing noise environment. All noise sensitive receptors in the vicinity of the turbines shall be identified. The selection of noise monitoring locations for background noise is of critical importance in the noise survey, therefore the rationale for choosing the number and the positioning of these should be provided by the applicant.

Once the existing noise environment has been established, the predicted increase in noise from the proposed turbines should then be quantified and assessed. It is this departments opinion that adherence to specified noise limit values does not always protect sensitive receptors from noise nuisance therefore the significance of the

predicted change in the noise environment should be fully assessed. It is requested that this information is outlined and displayed clearly in the EIS.

The potential cumulative effects of other windfarms, industry, quarrying etc in the vicinity of the development should be assessed as part of the noise survey. All mitigation measures for the control of noise shall be described.

Shadow Flicker:

A shadow flicker assessment should be carried out. All possible impacted dwellings and sensitive receptors shall be identified. The assessment should include identification of the room use in properties potentially impacted by shadow flicker. If reduction factors are applied as part of the shadow flicker assessment, the rationale for applying same shall be clearly outlined. Any mitigation measures for the control of shadow flicker shall be described. If the exact model of turbine is not finalised, it is recommended the impact of all various turbine designs considered by the applicant should be modelled in the assessment.

Geological Impacts/Land Stability

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

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').

Water:

All drinking water sources, both surface and groundwater (including individual private wells) shall be identified. Any potential impacts to these drinking water sources shall be assessed. Details of bedrock, overburden, vulnerability, groundwater flows and gradients, inner and outer zones of protection and catchment areas should all be considered when assessing potential impacts and possible mitigation measures. The EHS would recommend that all information is gathered by means of a site survey as desktop studies do not always accurately reflect the current use of water resources.

Dust:

The impact of dust generation from construction should be assessed and a dust minimisation plan or similar mitigation measure that meets current national standards for construction sites should be addressed.

Construction:

A construction management plan should be provided with the EIAR. This should comprehensively outline proposed working procedures and any mitigation measures that will be provided. The impact of any proposed road upgrade works or road widening, along with the impact of increased construction traffic on residents in the vicinity, should be assessed in the EIAR. Mitigation and traffic management measures should be outlined.

Complaints procedure:

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

Ancillary Facilities

The EIAR should provide location details of any site office, construction yard(s), fuel storage depot, sanitary accommodation, canteen, 1st Aid, disposal of waste water and the provision of potable drinking water supply.

Cumulative Impacts:

In line with the EPA Guidelines on the information to be contained in Environmental Impact Statements (2002) and their Advice Notes on Current Practise in the preparation of Environmental Impact Statements (2003) the EIA should include the assessment of cumulative impacts of any neighbouring windfarms along with any other industrial or energy developments in the area e.g. quarrying, heavy industry, intensive agriculture, composting facilities etc.

Health Gain:

The Developer should explore the possibility for recreational facilities to be provided on the Wind Energy Development. Any potential for health gain from the development should be exploited.



Tara Lawlor
Environmental Health Officer

Lisa Maguire

**Lisa Maguire
Environmental Health Officer**

**All correspondence or any queries with regard to this report including
acknowledgement of this report should be forwarded to:**

**Paul McGuinness
Principal Environmental Health Officer
Environmental Health Service
Unit 7A Lough Sheever Corporate Park
Robinstown
Mullingar
Co. Westmeath**

Niamh McHugh

From: Manager DAU <Manager.DAU@housing.gov.ie>
Sent: Tuesday 21 September 2021 11:14
To: Ellen Costello
Subject: GPre00210/2021 Proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath
Attachments: GPre00210-2021.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

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A Chara,

Attached please find the Nature Conservation Recommendations.

Regards,

Simon Dolan

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

Executive Officer

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigí an Rialtais

Government Offices

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

Newtown Road, Wexford, County Wexford, Y35 AP90

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

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Our Ref: **G Pre00210/2021**

(Please quote in all related correspondence)

21st September 2021

Ellen Costello
MKO
Tuam Road
Galway
H91 VW84

Via email: ecostello@mkofireland.ie

Re: Notification under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

Proposed Development: Proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath

A chara

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

Nature Conservation

The Department refers to the request by MKO regarding the scoping of an Environmental Impact Assessment Report and a Screening Stage for Appropriate Assessment in support of an Appropriate Assessment for a wind farm development at Ballynacorra and adjacent townlands, Co. Westmeath.

Please find below general scoping comments for EIAR, Appropriate Assessment screening and licensing requirements, followed by specific comments regarding the site in question.

These observations are intended to assist you in meeting the obligations that may arise in relation to European sites, other nature conservation sites, and biodiversity and environmental protection in general in the context of the current application. The observations are not exhaustive, and are made without prejudice to any recommendation that may be made by this Department in the future. Data collected

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

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Newtown Road, Wexford, County Wexford, Y35 AP90



and surveys carried out in connection with this proposed development may raise other issues that have not been considered here.

The National Parks and Wildlife Service website has recently been updated and should be consulted with regard to the impact of planning and development on nature conservation. The following link gives extensive details on the standards and content NPWS expect from applications. <https://www.npws.ie/development%20consultations>

With regard to: EIAR; Ecological survey:

With regard to scoping for an EIAR for a proposed development, in order to assess impacts on biodiversity, fauna, flora and habitats an ecological survey should be carried out of the proposed development site including the route of any access roads, pipelines or cables etc. to survey the habitats and species present. Any improvement or reinforcement works required for access and transport anywhere along any proposed haul route(s) should be included in the EIAR and subjected to ecological impact assessment with the inclusion of mitigation measures, as appropriate. Where bridges require strengthening this may involve grouting of crevices which may function as bat roosts. Where ex-situ impacts are possible survey work may be required outside of the development sites. Such surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The EIAR should include the results of the surveys and detail the survey methodology and timing of such surveys. It is expected by this Department that best practice will be adhered to with regard to survey methodology and if necessary non Irish methodology adapted for the Irish situation. The EIAR should cover the whole project, including construction, operation and, if applicable, restoration or decommissioning phases. Alternatives examined should also be included in the EIAR. Inland Fisheries Ireland should be consulted with regard to fish species if applicable. For information on Geological and Geomorphological sites the Geological Survey of Ireland should be consulted.

Specific reference should be made to the National Biodiversity Action Plan, Regional Spatial and Economic Strategy and any relevant County Biodiversity Plan and or objectives. Any losses of biodiversity habitat associated with this proposed development (including access roads and cabling etc.) such as woodland, scrub, hedgerows and other habitats should be mitigated for with no net loss of biodiversity the outcome.

In order to assess impacts it may be necessary to obtain hydrological and/or geological data. Any impact on water table levels or groundwater flows may impact on wetland sites some distance away (i.e., beyond the 15km radius). The EIAR should assess cumulative impacts with other plans or projects if applicable. Where negative impacts are identified suitable mitigation measures should be detailed as appropriate.

EIAR; Hedgerows and related species:

Hedgerows should be maintained where possible as they form wildlife corridors and provide areas for birds to nest in; hedgerow trees may provide roosting places for bats. Badger setts may be present. Hedgerows also provide a habitat for woodland flora. The EIAR should provide an estimate of the length of any hedgerow that will be lost.



Where it is proposed that trees or hedgerows will be removed there should be suitable planting of native species in mitigation incorporated into the EIAR. Where possible, hedgerows and trees should not be removed during the nesting season (i.e. March 1st to August 31st).

EIAR; Watercourses and wetlands:

Wetlands are important areas for biodiversity and ground and surface water quality should be protected during construction and operation of the proposed development. Any watercourse or wetland impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. These species could include otters (*Lutra lutra*), which are protected under the Wildlife Acts and listed on Annexes II and IV of the Habitats Directive, salmon (*Salmo salar*) and Lamprey species listed on Annex II of the Habitats Directive, Freshwater Pearl Mussels (*Margaritifera* species) and White-clawed Crayfish (*Austropotamobius pallipes*) which are protected under the Wildlife Acts and listed on Annex II of the Habitats Directive, Frogs (*Rana temporaria*) and Newts (*Triturus vulgaris*) protected under the Wildlife Acts and Kingfishers (*Alcedo atthis*) protected under the Wildlife Acts and listed on Annex I of the Birds Directive (Council Directive 79/409 EEC).

One of the main threats identified in the threat response plan for otter is habitat destruction see:

https://www.npws.ie/sites/default/files/publications/pdf/2009_Otter_TRP.pdf).

A 10m riparian buffer on both banks of a waterway is considered to comprise part of the otter habitat. Therefore any proposed development should be located at least 10m away from a waterway.

EIAR; Bats:

Bat roosts may be present in trees, buildings and bridges. Bat roosts can only be destroyed under licence under the Wildlife Acts and derogation under the Birds and Natural Habitats Regulations and such a licence would only be given if suitable mitigation measures were implemented. Any proposed migratory bat friendly lighting should be proven to be effective.

EIAR; Alien invasive species:

The EIAR should also address the issue of invasive alien plant and animal species such as Japanese Knotweed, and detail the methods required to ensure they are not accidentally introduced or spread during survey and or construction. Information on alien Invasive species In Ireland can be found at:

<http://invasives.biodiversityireland.ie/>
and at
<http://invasivespeciesireland.com/>.



EIAR; Bird surveys:

Survey methodologies should follow best practice and if necessary be modified to reflect the Irish situation. Two full years of bird surveys is considered to be minimum required. However, data must be sufficient to support conclusions and this may require substantially more survey work over longer periods of time. When survey results are being presented in an EIAR it is important that best practice is followed and that the full survey methodology as well as raw data, including dates and times are detailed. Furthermore, it is expected that bird survey data should be presented in context and records should be supported by basic environmental data such as hourly estimates of visibility, glare arc's, cloud cover and precipitation during VP and walk over survey periods. Results for species need to be referenced back to the overall local, regional, national and European populations and their dynamics as, in some cases even a small risk to a population of a species could be considered significant. It is important that seasonal bird migration routes are considered as well as routes of birds travelling on a daily basis between roosting and feeding areas.

EIAR; Impact assessment:

The impact of the proposed development on the flora/ fauna and habitats present should be assessed with particular regard to Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas designated under the EC Birds Directive (Directive 2009/147 EC), other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora designated under the Wildlife Acts 1976 to 2012, species protected under the Wildlife Acts including protected flora, 'Protected species and natural habitats', as defined in the Environmental Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008 including Birds Directive - Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive - Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur), important bird areas such as those identified by Birdlife International, features of the landscape which are of major importance for wild flora and fauna, such as those with a "stepping stone" and ecological corridors function, as referenced in Article 10 of the Habitats Directive, other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans), Red data book species, and biodiversity in general.

Complete project details including Construction Management Plans (CMPs) need to be provided in order to allow an adequate EIAR and appropriate assessment to be undertaken. Applicants need to be able to demonstrate that CMPs and other such plans are adequate and effective mitigation supported by scientific information and analysis and that they are feasible within the physical constraints of the site. The positions, locations and sizes of construction infrastructure and mitigation such as settlement ponds, disposal sites and construction compounds may significantly affect European and other designated sites, habitats and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment all potential effects of the development on the site are not being considered.

EIAR; Construction Management Plans



Construction Management Plans should contain sufficient detail to avoid any post construction doubt with regard to the implementation of mitigation measures, timings and roles and responsibilities for same. There can be no doubts or lacunae regarding what is required for mitigation, pre-commencement surveys and or licencing requirements.

Construction work should not be allowed to impact on water quality and measures should be detailed in the EIAR to prevent sediment and/or fuel runoff from getting into watercourses which could adversely impact on aquatic species. See EIAR; Flood Plains for details with regard to flooding risk.

Inland Fisheries Ireland (IFI) should be consulted with regard to impacts on fish species and the applicant may find it useful to consult their publication entitled "Planning for watercourses in the urban environment" which can be downloaded from their web site.

If applicants are not in a position to state the exact location and details of cable routes at the time of application, then they need to consider the range of options that may be used within their assessment.

It is important to note that NPWS has no post consent role. However, regional staff are available for liaison regarding any associated licencing requirements.

EIAR; Cumulative and ex situ impacts:

A rule of thumb often used is to include all European sites within a distance of 15km. It should be noted however that this will not always be appropriate. In some instances where there are hydrological connections a whole river catchment or a groundwater aquifer may need to be included. Similarly where bird flight paths are involved the impact may be on an SPA more than 15 km away. Other relevant Local Authorities should be consulted to determine if there are any projects or plans which, in combination with this proposed development, could impact on any European sites.

With regard to; Appropriate Assessment:

In order to carry out the Appropriate Assessment screening, and/or prepare a Natura Impact Statement (NIS), information about the relevant European sites including their conservation objectives will need to be collected. Details of designated sites and species and conservation objectives can be found on <http://www.npws.ie/>. Site-specific, as opposed to generic, conservation objectives are now available for many sites. Each conservation objective for a qualifying interest (QI) is defined by a list of attributes and targets and is often supported by further documentation. Where these are not available for a site, an examination of the attributes that are used to define site-specific conservation objectives for the same QIs in other sites can be usefully used to ensure the full ecological implications of a proposal for a site's conservation objective and its Integrity are analysed and assessed. It is advised, as per the notes and guidelines in the site-specific conservation objectives that any reports quoting conservation objectives should give the version number and date, so that it can be ensured and



established that the most up-to-date versions are used in the preparation of Natura Impact Statements and in undertaking appropriate assessments.

The Departmental guidance document on Appropriate Assessment is available on the NPWS web site at <https://www.npws.ie/development-consultations> and in the EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites. Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from; http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_assess_en.pdf

CJEU and Irish case law has clarified some issues and should also be consulted.

With regard to; Post construction monitoring:

This Department recognises the importance of pre and post construction monitoring, such as recommended in Drewitt et al. (2006), and Bat Conservation Ireland (2012). The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment. Please refer to Circular Letter PD 2/07 and NPWS 1/07 on this issue. This can be downloaded from the Department's website

<https://www.npws.ie/development-consultations>

The EIAR process should identify any pre and post construction monitoring which should be carried out. The post construction monitoring should include bird and bat strikes/fatalities including the impact on any such results of the removal of carcasses by scavengers. Monitoring results should be made available to the competent Authority and copied to this Department. A plan of action needs to be agreed at planning stage with the Planning Authority if the results in future show a significant mortality of birds and/or bat species. It is important to note again that NPWS has no post consent role. However, regional staff are available for liaison regarding any associated licencing requirements and or new information arising for specific species of concern. Note: any significant change to mitigation may require amendment and where a licence has expired; there will be a need for new licence applications for protected species.

With regard to; Licenses:

Where there are impacts on protected species and their habitats, resting or breeding places, licenses may be required under the Wildlife Acts or derogations under the Habitats Regulations. In particular bats and otters are strictly protected under annex IV of the Habitats Directive. A copy of Circular Letter NPWS 2/07 entitled "Guidance on Compliance with Regulation 23 of the Habitats Regulations 1997 – strict protection of certain species/applications for derogation licences" can be found on the Departmental web site at www.npws.ie/sites/default/files/general/circular-npws-02-07.pdf.

It should be noted however that the Regulations of 1997 have since been revoked and that Part 6 of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 is now the relevant part dealing with the protection of flora and fauna. In particular reference to Regulation 23 in the circular letter should be taken to mean Regulation 51 in the current Regulations.



In addition the planning authority will be required to take account of species protected under sections 21, 22 and 23 of the Wildlife Acts if there are any impacts on other protected species or their resting or breeding places, such as on protected plants, badger setts or birds' nests. They will also need to be cognisant of article 5 (d) of the Birds Directive. For that reason vegetation, including hedges and trees, should not be removed during the nesting season (i.e. March 1st to August 31st).

In order to apply for any such licenses or derogations as mentioned above the results of a survey should be submitted to the National Parks and Wildlife Service of this Department. Such surveys are to be carried out by appropriately qualified person/s at an appropriate time of the year. Details of survey methodology should also be provided. Should this survey work take place well before construction commences, it is recommended that an additional ecological survey of the development site should take place immediately prior to construction to ensure no significant change in the findings of the baseline ecological survey has occurred. If there has been any significant change mitigation may require amendment and where a licence has expired, there will be a need for new licence applications for protected species.

With regard to; Baseline data:

Other sources of habitat and species information beyond those already identified and the standard NPWS data request include (but are not be limited to) the National Biodiversity Data Centre (www.biodiversityireland.ie). Inland Fisheries Ireland (www.fisheriesireland.ie). BirdWatch Ireland (www.birdwatchireland.ie), Irish Raptor Study Group, Golden Eagle Trust and Bat Conservation Ireland (www.batconservationireland.org). Data may also exist at a County level within the Planning Authority.

General guidance and useful references:

1. EU Guidance on Wind Energy Developments and Natura 2000
2. The Departmental Wind Energy Planning Guidelines
3. Windfarms on Peatland (2008-2010) Mires and Peat volume 4.
4. Best Practice guidance for Habitat Survey and Mapping by George F Smith, Paul O'Donoghue, Katie O'Hora and Eamon Delaney, 2011. The Heritage Council.
5. Pearce-Higgins, James W., Stephen, Leigh, Langston, Rowena H. W., Bainbridge, Ian P. and Bullman. Rhys (2009). "The distribution of breeding birds around upland wind farms". Journal of Applied Ecology, 46,1323-1331.
6. Johnson, Gregory D. and Arnett Edward 8. "A Bibliography of Bat Fatality Activity and Interactions with Wind Turbines" (June 2004 updated February 2010) Bat Conservation International.
7. Pearce-Higgins, James W., Stephen, Leigh, Douse, Andy, and Langston, Rowena H. W. (2012). "Greater impacts of wind farms on bird populations



- during construction than subsequent operation: results of a multisite and multi-species analysis". Journal of Applied Ecology. 49.386-394.
8. Rodrigues, Let ai, (2014). "Guidelines for consideration of bats in wind farm projects". Eurobats Publication Series NO.6 UNEP and Eurobats.
 9. The Departmental guidance document on Appropriate Assessment which is available on the NPWS web site at <https://www.npws.ie/protected-sites/guidance-appropriate-assessment-planning-authorities>
 10. The EU Commission guidance entitled "Assessment of plans and projects significantly affecting Natura 2000 sites, Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC" which can be downloaded from http://ec.europa.eu/environment/nature/natura2000/management/guidance_en.htm
 11. Bat Conservation Ireland (2012) Wind Turbine/Wind Farm Development Bat Survey Guidelines. Version 2.8, December 2012.
 12. Drewitt, Allan Land Longston Rowena H. W. (2006) "Assessing the impacts of wind farms on birds". Ibis 148. 29-42.

Further to the above general comments please find below specific observations relating to the site in question.

- Specific consideration should be given to assessing risks, associated with the development, to seasonally resident and migratory bird species that are SCI for European sites in close proximity e.g. Whooper Swan (*Cygnus cygnus*) [A038]. Furthermore, the EIAR bird survey recommendations above suggest that bird survey data should be presented in context and records should be supported by basic environmental data such as hourly estimates of visibility, glare arc's, cloud cover and precipitation during VP and walk over survey periods. Moreover, two years of survey data is a guide to the minimum requirement for assessment of potential affects. However, the data must be sufficient to support conclusions in the EIAR and NIS reports irrespective of duration and or method required (i.e. more than two years data may be required and additional methods may be required beyond vantage point (VP) and walk over surveys).
- The Scoping document identifies Lough Swedy (site code 000689) as an SPA, this is not in keeping with NPWS map viewer information and it is evident that a more comprehensive desktop study is required.
- The site is located in an area that has strong hydraulically links to several protected sites. As a result, the management of surface and sub-surface water, water tables and drainage carries an elevated risk with regard to this proposed development.



- Any new or revised documentation should be cognisant of the Departments previous observations relating to wind farm development applications in the area, or related applications.
- The cumulative impact of the development and other associated wind farm developments in the wider area should be clearly assessed, particular emphasis should be given to the barrier effect and bird strike.
- Efforts must be made to source and use all relevant data regarding site usage by Annex and endangered bird species.
- There can be lacunae or unknowns in the NIS, because it is not appropriate for the details of proposed mitigation measures to be agreed post consent (see Circular PD 2/07 and NPWS 1/07). The detail of any proposed mitigation measure must be available as part of the assessment and prior to any decision in relation to the application.
- In relation to European sites particular emphasis is placed in our observations on the adequacy of data, information and analyses available in the NIS, and on the implications of the proposed development for the conservation objectives and integrity of the European sites affected. This is because an appropriate assessment must contain complete, precise and definitive findings and conclusions with regard to the implications of a proposal for the conservation objectives and integrity of a European site(s).

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

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

Is mise, le meas

Simon Dolan
Development Applications Unit

Niamh McHugh

From: INFO <Information@tii.ie>
Sent: Thursday 23 September 2021 09:43
To: Ellen Costello
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - TII

Follow Up Flag: Follow up
Flag Status: Flagged

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Dear Ms. Costello,

Thank you for your email of 6 August 2021 regarding the above.

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

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades are maintained to a high level, to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

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

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

- TII notes that the subject site appears to access the local/regional road in the first instance. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).

- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006).
- The EIAR/EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

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

- Grid connection and cable routing proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

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

There is around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approx. 5.4% of this. There is a critical requirement to ensure the strategic capacity and safety of this

national road network is maintained and significant Government investment already made in the national road network is safeguarded.

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

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

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

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

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

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
Ref No. TII21-114253



From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 13:07
To: Landuse Planning <LandUsePlanning@tii.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - TII

CAUTION: This email originated from outside of TII. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

MKO

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



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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/about/about-tii/Data-Protection/?set-lang=ga>

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Niamh McHugh

From: Roger Woods <rwoods@bai.ie>
Sent: Wednesday 9 February 2022 09:03
To: Ellen Costello
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - BAI

Hi Ellen

I have no further comment on this proposal.

Regards

Roger

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

Tel: 01 6441200
Fax: 01 6441299

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From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Tuesday 8 February 2022 12:07
To: Roger Woods <rwoods@bai.ie>
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - BAI

Dear Sir or Madam,

An EIA Scoping Document was issued on the 6th August 2021 for the Proposed Ballynacorra Renewable Energy Development.

Please find attached scoping letter that highlights some revisions to the information previously issued as part of the EIA Scoping process.

As part of the scoping exercise for the Proposed Renewable Energy Development, we would welcome any comments in relation to the proposed project.

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

Many thanks,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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From: Roger Woods <rwoods@bai.ie>
Sent: 09 August 2021 09:36
To: Ellen Costello <ecostello@mkoireland.ie>
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - BAI

Hi Ellen

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

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From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 12:23
To: Roger Woods <rwoods@bai.ie>
Subject: 201050 Ballynacorra Renewable Energy Development Scoping Document - BAI

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



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Niamh McHugh

From: Kieran Flood <kieran.flood@iwt.ie>
Sent: Thursday 10 February 2022 09:59
To: Ellen Costello
Cc: info@iwt.ie; enquiries@iwt.ie
Subject: Re: 201050 Ballynacorra Renewable Energy Development Scoping Document - IWT

You don't often get email from kieran.flood@iwt.ie. [Learn why this is important](#)

Dear Ellen,

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but will keep it on file.

Regards,
Kieran

On Tue, 8 Feb 2022 at 12:41, Ellen Costello <ecostello@mkoireland.ie> wrote:

Dear Sir or Madam,

An EIA Scoping Document was issued on the 6th August 2021 for the Proposed Ballynacorra Renewable Energy Development.

Please find attached scoping letter that highlights some revisions to the information previously issued as part of the EIA Scoping process.

As part of the scoping exercise for the Proposed Renewable Energy Development, we would welcome any comments in relation to the proposed project.

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

Many thanks,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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From: Ellen Costello

Sent: 06 August 2021 13:01

To: info@iwt.ie

Cc: enquiries@iwt.ie

Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - IWT

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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--

Kieran Flood, IWT Coordinator

Phone: 089 490 5716 (Monday to Friday) / 01 445 7259 (our office landline available Tuesday to Thursday)

Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2

Registered Charity (CRA) Number: 20010966

Facebook: IrishWildlifeTrust

Twitter: @irishwildlife

MAKE A DIFFERENCE - Join the IWT Today - www.iwt.ie

Niamh McHugh

From: GSI Planning <GSIPlanning@GSI.ie>
Sent: Tuesday 15 February 2022 14:35
To: Ellen Costello
Cc: Clare Glanville; GSI Planning
Subject: RE: EIS 22/33 - Ballynacorra Renewable Energy Development
Attachments: 22_33 Ballynacorra Renewable Energy Development.pdf; GSI datasets relevant to EIA & SEA_20210421.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ellen,

With reference to your letter received on the 08 February 2022, concerning the revision to the EIA Scoping Document for the Proposed Renewable Energy Development in the townland of Ballynacorra and adjacent townlands, please find attached response and dataset sheet from Geological Survey Ireland.

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

Yours sincerely,

Trish Smullen
Geological Survey Ireland

From: GSI Planning
Sent: 08 February 2022 12:53
To: Clare Glanville; Sophie O'Connor; Brian McConnell; Monica Lee; Taly Hunter Williams; Sean Cullen; Charise McKeon; Jim Hodgson; Eoin McGrath; Trish Smullen
Cc: GSI Planning
Subject: EIS 22/33 - Ballynacorra Renewable Energy Development revised Scoping Document, Co Westmeath/Roscommon

[EIS 22/33](#)

[Ballynacorra Renewable Energy Development revised Scoping Document, Co Westmeath & Co Roscommon \[cf. 21/296\]. Request for observations by MKO. Letter and document are enclosed.](#)

Regards,

[John](#)

From: Ellen Costello [mailto:ecostello@mkoireland.ie]
Sent: 08 February 2022 12:41
To: GSI Planning
Cc: John Butler
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - GSI

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

Dear Sir or Madam,

An EIA Scoping Document was issued on the 6th August 2021 for the Proposed Ballynacorra Renewable Energy Development.

Please find attached scoping letter that highlights some revisions to the information previously issued as part of the EIA Scoping process.

As part of the scoping exercise for the Proposed Renewable Energy Development, we would welcome any comments in relation to the proposed project.

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

Many thanks,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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From: Ellen Costello

Sent: 06 August 2021 12:55

To: john.butler@gsi.ie

Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - GSI

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

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



Ellen Costello
MKO
Tuam Road
Galway
H91 VW84

15 February 2022

Re: Revision to EIA Scoping Document for the Proposed Renewable Energy Development in the townland of Ballynacorra and adjacent townlands in County Westmeath and County Roscommon

Your Ref: 201050

Our Ref: 22/33 [c.f. 21/296]

Dear Ellen,

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

With reference to your letter received on the 08 February 2022, concerning the revision to the EIA Scoping Document for the Proposed Renewable Energy Development in the townland of Ballynacorra and adjacent townlands in County Westmeath and County Roscommon, Geological Survey Ireland would like to make the following comments, (with emphasis on the grid connection route), in addition to the comments in our previous response 21/296.

Geoheritage

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

County Geological Sites (CGSs), 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 Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS. CGSs are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#).

The audits for Co. Westmeath, Co. Offaly and Co. Roscommon were carried out in 2019, 2016 and 2012 respectively. The full report details can be found at [The Geological Heritage of Westmeath](#), [The Geological Heritage of Offaly](#) and [The Geological Heritage of Roscommon](#). **Our records show that there are CGSs in the vicinity of the proposed underground grid connection route from Thornsby 110kV Substation, Tullamore, to the proposed renewable energy development at Umma More.**

Ballyduff Esker, Co. Offaly (GR 231633, 228192), under IGH theme: IGH 7 Quaternary. The Ballyduff Esker and surrounding sands and gravels includes an exceptionally large accumulation of sands and gravels deposited both under the ice sheet and at its margin as the ice withdrew westwards across Offaly at the end of the last Ice Age. The esker forms part of the larger Ballyduff Esker-Rahugh Ridge Esker System, which extends into County Westmeath to the northeast. Link to Site Report: [OY001](#).



Clonmacnoise Esker, Co. Offaly (GR 214581, 230826), under IGH theme: IGH 7 Quaternary.

The Clonmacnoise Esker and surrounding sands and gravels includes an exceptionally large accumulation of sands and gravels deposited both under the ice sheet and at its margin as the ice withdrew westwards across Offaly at the end of the last Ice Age. The esker forms part of the larger Ballinasloe-Split Hills-Clonmacnoise-Clara Esker System, which extends from Galway, through Offaly, and into Westmeath, and is the traditional route defined as the 'Eiscir Riada' in ancient Irish Folklore. Link to Site Report: [OY008](#).

Horseleap Esker, Co. Westmeath (GR 227712, 238787), under IGH theme: IGH 7 Quaternary. A partially tree-covered esker ridge to the north of Horseleap. One of the tributary eskers in the greater subglacial esker 'river' system in the Midlands. Link to Site Report: [WH010](#).

With the current plan, there may be potential impacts on the integrity of current CGSs envisaged by the proposed development, should these sites not be assessed as constraints. Ideally, the sites 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 exposures and access to the sites 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

Geological Survey Ireland's [Groundwater and Geothermal Unit](#), provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.

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

There are several karst landforms in the vicinity of the proposed underground grid connection route including 3 karst springs adjacent to the N52 at Durrow, Co. Offaly.

Several aquifers underlie the proposed underground grid connection route including a 'Regionally Important Aquifer - Karstified (diffuse)', a 'Locally important gravel aquifer' and a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones'. The Groundwater Vulnerability map indicates a range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.

There is a groundwater drinking water abstraction in the vicinity of the proposed grid connection route for which there is a zone of contribution/source protection area: Tullamore Ardan Public Water Supply Scheme (PWSS). Key to groundwater protection in general, and protection of specific drinking water supplies, is preventing ingress of construction runoff to the aquifer. Design of drainage will need to be cognizant of this supply scheme and the interactions between surface water and groundwater as well as run-off. Appropriate design should be undertaken by qualified and competent persons to include mitigation measures as necessary, such as SUDs or other drainage mitigation measures.



Any excavation/cuttings required should ensure that groundwater flow within the zones of contribution to the groundwater abstraction points is not disrupted, resulting in diminished yields. Note that there could be other groundwater abstractions in the locality for which Geological Survey Ireland has not undertaken studies, and a robust assessment should be undertaken by qualified and competent persons.

Given the nearby drinking water sources (Public Water Supply, springs and domestic wells), the effects of any potential contamination / dewatering as a result of the underground grid connection development would need to be assessed.

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

[GWClimate](#) is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the [Map viewer](#).

Geological Mapping

Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found [here](#), in your future assessments.

Geotechnical Database Resources

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

Natural Resources (Minerals/Aggregates)

Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#).

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

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and lithogeochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).



Geophysical data

Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils & rocks as part of the [Tellus programme](#). These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.

Other Comments

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 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 Clare Glanville, or my colleague Trish Smullen at GSIPlanning@gsi.ie.

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

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

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

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fde2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&scale=0
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	https://secure.dcaa.gov.ie/goldmine/index.html
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a9916dc0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		http://www.cherishproject.eu/en/
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water /Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Active quarries	Land & Soils	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	https://gis.epa.ie/EPAMaps/default?teasting=7&nothing=7&lid=EPA:LEMA_Facilities_Extractive_Facilities
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://www.epa.ie/enforcement/mines/
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754

Notes:

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

Niamh McHugh

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Thursday 17 February 2022 15:46
To: Ellen Costello
Cc: Landuse Planning
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - TII
Attachments: TII22-117164 - EIAR Scoping - Ballynacorra Renewable Energy Development Scoping Document - TII.pdf

Dear Ms Costello
I attach TII's observations and comments .
Regards

Tara Spain
Head of Land Use Planning .
Transport Infrastructure Ireland.
Email: LandUsePlanning@tii.ie



From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Tuesday 8 February 2022 12:31
To: INFO <Information@tii.ie>
Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - TII

Dear Sir or Madam,

An EIA Scoping Document was issued on the 6th August 2021 for the Proposed Ballynacorra Renewable Energy Development.

Please find attached scoping letter that highlights some revisions to the information previously issued as part of the EIA Scoping process.

As part of the scoping exercise for the Proposed Renewable Energy Development, we would welcome any comments in relation to the proposed project.

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

Many thanks,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

MKO
Tuam Road, Galway
Ireland, H91 VW84
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From: INFO <Information@tii.ie>

Sent: 23 September 2021 09:43

To: Ellen Costello <ecostello@mkoireland.ie>

Subject: RE: 201050 Ballynacorra Renewable Energy Development Scoping Document - TII

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Thank you for your email of 6 August 2021 regarding the above.

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

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades are maintained to a high level, to ensure quality levels of service, accessibility and connectivity to transport users. This requirement is further reflected in the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

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

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

- TII notes that the subject site appears to access the local/regional road in the first instance. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development.
- The developer should assess visual impacts from existing national roads.
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts.

- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006).
- The EIAR/EIS should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see Guidelines for the Treatment of Noise and Vibration in National Road Schemes (1st Rev., National Roads Authority, 2004)).
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs.
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.
- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network.
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

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

- Grid connection and cable routing proposals should be developed to safeguard proposed road schemes as TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme. In that regard, consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

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

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

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

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

Cable routing should avoid all impacts to existing TII infrastructure such as traffic counters, weather stations, etc. and works required to such infrastructure shall only be undertaken in consultation with and subject to the agreement of TII, any costs attributable shall be borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

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

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

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
Ref No. TII21-114253



From: Ellen Costello <ecostello@mkoireland.ie>
Sent: Friday 6 August 2021 13:07
To: Landuse Planning <LandUsePlanning@tii.ie>
Subject: FW: 201050 Ballynacorra Renewable Energy Development Scoping Document - TII

CAUTION: This email originated from outside of TII. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed renewable energy development in Ballynacorra and adjacent townlands in Co. Westmeath.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,

Ellen



Ellen Costello MSc. BSc.
Environmental Scientist

MKO

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



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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/about/about-tii/Data-Protection/?set-lang=ga>

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Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúl do postmaster@tii.ie, le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.

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De réir pholasáí BIÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílim ag súil le freagra ná le gníomh uait lasmuigh de do ghnáthuaireanta oibre féin mura bhfuil sé ráite go soiléir go bhfuil gá gníomhú go práinneach.

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Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag <https://www.tii.ie/about/about-tii/Data-Protection/?set-lang=ga>

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Ellen Costello MSc. BSc.
Environmental Scientist
MKO
Tuam Road,
Galway
H91 VW84

Email: ecostello@mkoireland.ie

Dáta | Date
18/02/2022

Ár dTag | Our Ref.
TII22-117164

Bhur dTag | Your Ref.

Re: EIAR Scoping - Ballynacorra Renewable Energy Development Scoping Document

Dear Ms Costello

I acknowledge receipt of your email of 8th of February relating to the above proposal.

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

National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

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 serious concern, grid connection routing proposals crossing the M6 motorway and critically important N52, TII advises the following:

- In TII's experience, grid/ cable connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance and safety works to existing roads. Constraints and costs arise to on-line national road maintenance, improvements and upgrades. In that regard, TII recommends:
 - i. An assessment of all alternatives for grid/cable connection routing should be undertaken.
 - ii. Grid connection and cable routing proposals should be developed to safeguard proposed road schemes and consideration should be given to routing options, use of existing crossings, depth of cable laying, etc.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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- iii. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes. Please note TII will not be responsible for costs associated with future relocation of cable routing where proposals are catered for in an area of a proposed national road scheme.
- In addition to the previous point, TII advises that a third party seeking to cross a motorway will require Works Specific Deeds of Indemnities, arrangements for third party access or consent from TII in accordance with Section 53 of the Roads Act, 1993. Arrangements for third party access are also likely to be required. Contact should be made to 'thirdpartyworks@tii.ie' to progress this element when proposals for the crossings have been developed.

General requirements for directional drilling under a motorway include;

- The launch and reception pits for the Pipeline are located outside the Motorway boundary,
- The Pipeline will be installed at such depth so as not to conflict with the drainage for the Motorway,
- Neither the Works nor the Pipeline will damage or interfere with the Motorway,
- There are no bolted joints in that part of the Pipeline within the motorway fence-line,
- Specific requirements may also arise for these proposed works.

In relation to the cumulative impact of associated planned development, TII advises;

- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. In relation to national roads, the Authority's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA. Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed as TII will not be responsible for such costs,
- In the interests of maintaining the safety and standard of the national road network, methods/techniques proposed for any works traversing/in proximity to the national road network should be identified,
- TII recommends that that applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal 'weight' loads are proposed, separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal 'weight' load proposed.

The national road network is managed by a combination of PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. The applicant/developer should also consult with all PPP Companies, MMaRC Contractors and road authorities over which the haul route traverses to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is safeguarded.

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

I trust that the above comments are of assistance.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tara Spain', written over a horizontal line.

Tara Spain
Head of Land Use Planning