

Organisation	Response/Feedback Received
An Taisce	No
Bat Conservation Ireland	No
Bird Watch Ireland	No
Bodyke Community Development Association	No
Clare County Council Archaeologist	No
Clare County Council Conservation Officer	No
Clare County Council Environmental and Water Services Department	No
Clare County Council Heritage Department	No
Clare County Council Planning Department	No
Clare County Council Roads Department	No
Clare County Council Tourism Department	No
Commission for Regulations of Utilities, Water & Energy (CRU)	No
Department of Agriculture, Food and the Marine	No
Department of Culture, Heritage, and the Gaeltacht	No
Department of Enterprise, Trade & Employment	No
Department of Environment, Climate & Communications	No
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	No
Department of Housing, Planning and Local Government	No
Department of Transport	No
East Clare Community Co-Op	No
East Clare Heritage Company	No
East Clare Walking Club	No
EirGrid	No
Failte Ireland	Yes
Forestry Division	No
Friends of the Earth	No
Friends of the Irish Environment	No
Geological Survey of Ireland (GSI)	Yes
Health Service Executive (HSE)	No
Heritage Council	No
Inland Fisheries Ireland (IFI)	No

Organisation	Response/Feedback Received
Institute of Geologists of Ireland (IGI)	No
Irish Farmers Association (IFA)	No
Irish Sports Council	No
Irish Wildlife Trust (IWT)	No
National Monuments Service (NMS)	No
National Parks and Wildlife DAU	Yes
Office of Public Works (OPW)	Yes
Southern Regional Assembly	No
Sustainable Energy Authority of Ireland (SEAI)	No
Transport Infrastructure Ireland (TII)	Yes
Visit East Clare	No
Waterways Ireland	No

Noelle O'Leary

From: planning applications <planning.applications@failteireland.ie>
Sent: Wednesday 30 November 2022 14:38
To: Grace O'Connor
Cc: Noelle O'Leary
Subject: RE: Fáilte Ireland:: Proposed 110kv Grid Connection from Carrownagowan Wind Farm
Attachments: Fáilte Ireland EIAR Guidelines.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Hello Grace,

Thank you for your email and letter regarding the Environmental Impact Assessment Report for a 25.16km underground 110kV grid connection for the consented Carrownagowan Wind Farm in Co. Clare. It was sent to me by our Customer Support Team.

Please see attached a 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.

Just for your information, Fáilte Ireland has a dedicated mailbox for all planning notifications/applications, consultations etc. Please use the following email address planning.applications@failteireland.ie when sending planning notifications/applications, consultations etc.

By using the email address, it will ensure information/notifications will go directly to the Environment & Planning Manager (Mr Shane Dineen) and team and will be reviewed and actioned in a timely manner by the Manager and the Environment & Planning Team.

Regards & thanks,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86
M +353 (0)86 0357590



[LinkedIn](#) | [Twitter](#) | [YouTube](#) | [Facebook](#)



Noelle O'Leary
MWP
Reen Point
Blennerville
Tralee
Co Kerry V92 X2TK

06 December 2022

Re: Consultation on proposed 110kv Grid Connection from the consented Carrownagowan Wind Farm in Co. Clare to the existing ESB owned 110kV substation at Ardnacrusha, Co. Clare.

Your Ref: Project No. 23296

Our Ref: 22/476

Dear Noelle,

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 email received on the 17th November 2022, concerning the consultation on the proposed 110kv Grid Connection from the consented Carrownagowan Wind Farm in Co. Clare to the existing ESB owned 110kV substation at Ardnacrusha, Co. Clare., 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

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

The audit for Co. Clare was completed in 2005. The full report details can be found [here](#). **Our records show that there are no CGSs in the vicinity of the proposed Grid Connection.**

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 several aquifers classed as a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones', a 'Locally important gravel aquifer', a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Regionally Important Aquifer - Karstified (diffuse)' underlie the proposed grid connection route.

The Groundwater Vulnerability map indicates the 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.

[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 Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/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.

Please note we have recently launched QGIS compatible bedrock (100K) and Quaternary geology map data, with instructional manuals and videos. This makes our data more accessible to general public and external stakeholders. QGIS compatible data can be found in our downloadable bedrock 100k .zip file on the [Data & Maps](#) section of our website.

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.

Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.

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 grid connection development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.



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.

Guidelines

The following guidelines may also be of assistance:

- Institute of Geologists of Ireland, 2013. Guidelines for the Preparation of the Soils, Geology and Hydrogeology Chapters of Geology in Environmental Impact Statements.
- [EPA, 2022](#). Guidelines on the information to be contained in Environmental Impact Assessment Reports (EIAR)

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 GSIPanning@gsi.ie.

Yours sincerely,

Dr. Clare Glanville
Senior Geologist
Geological Survey Ireland

Trish Smullen
Geoheritage and Planning Programme
Geological Survey Ireland

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



Your Ref: Carrownagowan Wind Farm

Our Ref: **G Pre00301/2022** (Please quote in all related correspondence)

29 December 2022

Malachy Walsh & Partners
Engineering & Environmental Consultants
Reen Point
Blennerville,
Tralee
Co. Kerry
V92 X2TK

Via email: grace.oconnor@mwp.ie; noelle.oleary@mwp.ie

Proposed Pre Planning Development: Malachy Walsh and Partners (MWP) for FuturEnergy Carrownagowan DAC: Consultation on proposed 25.16km underground 110kV grid connection which will provide a connection to the national grid at Carrownagowan Wind Farm in Co. Clare

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 heading.

Nature Conservation

These observations are intended to assist you in relation to identifying potential impacts on European sites, other nature conservation sites, and biodiversity and environmental protection in general, in the context of the current proposal based on the papers submitted to this Department on a pre-planning basis. They are not exhaustive and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority/ies, in the role as statutory consultee under the Planning and Development Act, 2000, as amended.

Guidance on EIAR

You are advised to consult the European Commission's (2017) 'Environmental Impact Assessment: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/EU as amended by 2014/52/EU)'. Any surveys and assessments should be based on a full details of the overall project, noting all lands that will be required.



Water quality

Wetlands and watercourses are important areas for biodiversity and ground and surface water quality should be protected during construction of the proposed development, in particular regarding the natural river / stream crossings proposed along the route. The EIAR should include an assessment of the hydrological impacts on wetlands and watercourses from the proposed development including a detailed assessment of the proposed horizontal directional drilling method. Direct water quality impacts including but not limited to sedimentation and contaminated surface water run off should be addressed, and indirect impacts including but not limited to pollution sources such as drilling fluid disposal and oil and fuel spillages from the rig operation. Any watercourse or wetland which may be impacted on should be surveyed for the presence of protected species and species listed on Annexes II and IV of the Habitats Directive. For example, these species could include Otter (*Lutra lutra*) which are protected under the Wildlife Acts and listed on Annex II and IV of the Habitats Directive, Salmon (*Salmo salar*), Lamprey (three species in Ireland) listed on Annex II of the Habitats Directive, Freshwater Pearl Mussel (*Margaritifera* species) and White-clawed Crayfish (*Austropotamobius pallipes*) which are both protected under the Wildlife Act 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).

Hedgerows, Scrub and related habitats

Hedgerows and scrub should be maintained where possible, as they form wildlife corridors and provide areas for birds to nest in; hedgerows provide a habitat for woodland flora, roosting places for bats and badger setts may also be present. The EIAR should provide an estimate of the length/area of any hedgerow/scrub that will be removed. 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. Hedgerows, trees, scrub and uncultivated vegetation (including peatland habitats) should not be removed during the nesting season (i.e. March 1st to August 31st), noting the protection afforded under the Wildlife Act.

Alien invasive species

The EIAR should also address the issue of invasive alien plant and animal species such as *Rhododendron ponticum* and 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/>.

Biodiversity

The National Biodiversity Action Plan 2017- 2021 aims to conserve and restore Ireland's biodiversity. A key objective of the plan is to achieve; no net contribution to biodiversity loss arising from development projects occurring within the lifetime of the plan. Accordingly, the EIAR should outline how this project will avoid a net loss of biodiversity and include relevant mitigation and or compensatory measures where necessary.



Impact assessment

The impact of the proposed development on the flora/ fauna and habitats present should be assessed with particular regard to:

- Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC)
- and Special Protection Areas (SPA) designated under the EC Birds Directive (Council Directive 2009/147 EC),
- Natural Heritage Areas;
- proposed Natural Heritage Areas;
- Nature Reserves;
- Refuges for Fauna or Flora designated under the Wildlife Acts 1976 to 2018;
- 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);
 - Habitats Directive - Annex I habitats, Annex II species and their habitats;
 - 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.

Construction Management Plans and Mitigation

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. CMPs 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. Any mitigation needs to be included in detail and if being relied upon to reach conclusions must be proved to be achievable and likely to be effective in any given scenario it is needed. Proof of effectiveness will be required with examples of where similar techniques have been employed previously. Applicants need to be able to demonstrate that CMPs and other such plans are adequate, all mitigation is included and effective and 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. 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. 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" (2020) which can be downloaded from their web site.

Guidance on the Appropriate Assessment (AA)

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. Screening for appropriate assessment should focus on the likely significant effects of the proposed development and related activities on European sites noting that impacts to sites via air and water may occur over large distances using the source-pathway-receptor model. Details of all 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) habitat or species 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 assessed. The proposed route goes directly through Glenomra Wood SAC (also a pNHA). The qualifying interest for this site is Old sessile oak woods [91A0]. 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 including map boundaries¹ are used in the preparation of Natura Impact Statements and in undertaking appropriate assessments. More recent CJEU and Irish case law has clarified some issues and should also be consulted. When carried out by the competent authority, the appropriate assessment cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the project on European sites.

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. 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.

¹ <https://www.npws.ie/maps-and-data/designated-site-data>



Licenses

Where there are impacts on protected species and their habitats, resting or breeding places, licenses may be required under the Wildlife Act 1976-2018 or derogations under the EC (Birds and Natural Habitats) Regulations 2011, as amended. In particular, bats as outlined earlier and otters, are subject to a regime of strict protection pursuant to the requirements of the Habitats Directive (92/43/EEC) as transposed in Irish law in Regulation 51 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended). In addition, the EIAR should 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. And it will also need to be cognisant of article 5 (d) of the Birds Directive. For that reason, uncultivated 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 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 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.

You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@npws.gov.ie.

Is mise le meas,

A handwritten signature in blue ink, appearing to read 'MHillis', is positioned below the text 'Is mise le meas,'.

Malcolm Hillis
Development Applications Unit
Administration

OPW Ref: 486-2022

Your Ref: Project No. 23296

The Proposed Windfarm Carrownagowan Co. Clare

Dear Sir/Madam,

I refer to your email dated 17th November 2022 in relation to the above project seeking comments or observations from this office.

We would make the following comments.

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

I attach a copy of our brochure on obtaining Section 50 consent for your information. Further information on the process including copies of the appropriate application form and brochure are available on our website at

<https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/>

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

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

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

We would recommend that a flood risk assessment be carried out with regard to the proposed

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

Include the following paragraph if the correspondence being dealt with relates to the preparation of an EIA.

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

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

Yours sincerely,

Derek Higgins
South-West Drainage Maintenance & Construction

Oifig na nOibreacha Poiblí
Office of Public Works

Teach Theampall Mungairit, Mungairit, Co Luimnigh, V94 EK07
Templemungret House, Mungret, Co Limerick, V94 EK07

Noelle O'Leary

From: Grace O'Connor
Sent: Tuesday 22 November 2022 14:09
To: Noelle O'Leary
Cc: Ken Fitzgerald
Subject: FW: Consultation on proposed 110kv Grid Connection from the consented Carrownagowan Wind Farm in Co. Clare

Follow Up Flag: Follow up
Flag Status: Flagged

From: INFO <Information@tii.ie>
Sent: Tuesday 22 November 2022 14:06
To: Grace O'Connor <grace.oconnor@mwp.ie>
Subject: RE: Consultation on proposed 110kv Grid Connection from the consented Carrownagowan Wind Farm in Co. Clare

Dear Ms. O'Connor,

Thank you for your email of 17 November 2022 regarding the above. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (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 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 respect to grid connection routing proposals generally, TII provides the following observations;

- 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. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes.

- In the context of the existing national roads 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 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. The Authority 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 with any costs attributable being borne by the applicant/developer. The developer should also be aware that separate approvals may be required for works traversing the national road network.

In relation to the general project scoping/pre-planning, the recommendations indicated below provide general guidance;

- 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 the 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 road authority prior to the commencement of any development on site.

I trust that the above comments are of assistance.

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
Ref No. TII22-120969



From: Grace O'Connor <grace.oconnor@mwp.ie>
Sent: Thursday 17 November 2022 15:04
To: Landuse Planning <LandUsePlanning@tii.ie>
Cc: Noelle O'Leary <noelle.oleary@mwp.ie>
Subject: Consultation on proposed 110kv Grid Connection from the consented Carrownagowan Wind Farm in Co. Clare

Dear Sir/Madam,

MWP has been commissioned by FuturEnergy Carrownagowan DAC, to prepare an Environmental Impact Assessment Report (EIAR) to accompany the planning application to An Bord Pleanála for a 25.16km underground 110kV grid connection which will provide a connection to the national grid from the consented Carrownagowan Wind Farm in Co. Clare.

Please see letter and Scoping report attached for your information.

Kind regards,

Grace O'Connor

Office Administrator

e grace.oconnor@mwp.ie

t +353 (0)66 7123404 w www.mwp.ie

Reen Point, Blennerville,
Tralee, Co. Kerry, V92 X2TK, Ireland

MWP

This email and any attachments are CONFIDENTIAL to addressee and Malachy Walsh & Co Ltd.
Any use, reading, copying, distributing or disclosure of the information in this email is strictly prohibited if you are not the intended recipient.

*Please also note that this information should not be edited or redistributed in any way.
If you have received this email in error please notify the originator of the message.*

Registered Company: Malachy Walsh & Co Ltd

Registered Office: Park House, Bessboro Road, Blackrock, Cork, Ireland.
Registered in Ireland. No. 133445

In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

De réir pholasaí 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.

TII processes personal data provided to it in accordance with its Data Protection Notice available at <https://www.tii.ie/about/about-tii/Data-Protection/>

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>

TII E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error then please notify postmaster@tii.ie and delete the original including attachments.

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 iúil do postmaster@tii.ie, le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.

In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

De réir pholasaí 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.

TII processes personal data provided to it in accordance with its Data Protection Notice available at <https://www.tii.ie/about/about-tii/Data-Protection/>

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>

TII E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error then please notify postmaster@tii.ie and delete the original including attachments.

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 iúil do postmaster@tii.ie, le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.