# **KWF Grid Connection EIA Report 2023**

# Volume C2: EIAR 2023 Main Report

# **Chapter 3: the Scoping Consultations**

**EIAR Coordinator:** 



August 2023

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Appendices referenced in this topic chapter can be found at the end of the chapter.

# **Glossary of General Terms**

<u>Term</u>	<u>Definition</u>	
KWF Grid	Underground cabling, additional plant and apparatus in the existing Woodhouse	
Connection (the	Substation, the construction a new link road, the widening of an existing forestry road	
subject	and the use of the existing entrance and windfarm road network at Woodhouse	
development)	Windfarm.	
	Not Constructed - Knocknamona Windfarm authorised in 2016 (ABP-PL 93.244006);	
Authorised	Amendments to Knocknamona Windfarm to provide for larger turbines authorised in	
Knocknamona	September 2022 (ABP-309412-21) and Junction & Bend Widening Works to facilitate	
Windfarm	turbine component access through the windfarm site entrance at Knocknaglogh Lower	
	authorised in December 2022 (ABP-314219-22)	

# 3. The Scoping Consultations

The main provisions of the EIA Directive on consultations are Articles 6 and 7. Article 7 refers to transboundary projects so just Article 6 is relevant here. Article 6 requires consultations with two different groups 1) public authorities when they are likely to be concerned and 2) the public.

Scoping consultation in the form of written consultation and responses and/or face-to-face meetings took place with Waterford County Council Planning and Roads Department; and with Statutory Bodies and Other Parties that are likely to be concerned. All feedback received was considered and given due consideration; in the content and the extent of the information contained in the EIAR; and in the methodology employed to examine all factors in the EIAR.

The public are informed early in the decision-making process through public notice at the site, in print media and on the EIA Portal hosted by the Department of Housing, Planning and Local Government before the application is lodged with Waterford City & County Council. Also, the planning application is available for inspection on the Waterford City and County Council website and on the Local Government Ireland Planning Portal.

#### 3.1 Consultation with the Grid System Operators

The grid connection method and route examined in Knocknamona Windfarm Revised EIS 2015 was a connection point to Dungarvan Substation, c.8km to the northeast of the windfarm substation which would require a grid connection route of at least 11.5km along a combination of public roads and under lands, cross country. However, since 2015 a possible new grid connection point was commissioned—Woodhouse Substation. The grid connection point for Woodhouse Windfarm at Woodhouse Substation is just c.2km from Knocknamona Windfarm. This presents a possible alternative grid connection option for Knocknamona. Therefore, in May 2017, Ecopower contacted ESB Networks, who are the operators of Woodhouse Substation, to ascertain if there was spare electrical capacity at the newly commissioned and operational Woodhouse Substation that could accommodate the electricity to be produced from Knocknamona Windfarm and if there was room at the substation to accommodate the extra equipment required. ESB Networks in consultation with Eirgrid, confirmed that there was adequate spare capacity and space to accommodate a grid connection from Knocknamona Windfarm.

Technical and environmental exploratory investigations were carried out on a possible grid connection method and route from Knocknamona Windfarm to Woodhouse Substation. These investigations informed the consideration of alternatives – Chapter 4: Section 4.4 Alternative Grid Connection Location Point.

This grid connection method (Knocknamona Windfarm to Woodhouse Substation) was ultimately chosen as the preferred alternative method. This is the 2<sup>nd</sup> application for this grid connection method and route which is required because the planning grant for the 1<sup>st</sup> application in 2019, was overturned on procedural issues in February 2023 prior to a Judicial Review hearing. This 2<sup>nd</sup> application grid connection method is the same as the 2019 method.

# 3.2 Consultation with Waterford City & County Council (WCCC) and DAUS

On 23<sup>rd</sup> May 2022, Knocknamona Windfarm submitted a Pre-Planning consultation request to the Planning Department of Waterford City & County Council (WCCC). No written or phone reply has been received to the May 2022 request. A follow-up request was made on 16<sup>th</sup> August, 2023 – acknowledged on 18.08.23 WCCC Ref. PQ2023324. See consultation on pdf Page 14-18 of Appendix 3.1 for the August 2023 consultation request and acknowledgement.

However this is the 2<sup>nd</sup> KWF Grid Connection application and is similar to the previous application in 2019 and therefore earlier comprehensive consultations with WCCC planning & roads departments and the Developments Application Unit (DAU) re heritage - both pre-application and in relation to a Request for Further Information in 2019, remain relevant and informed this 2023 EIAR chapter descriptions, evaluations and appendices. See consultation on pdf Page 20 - 24 of Appendix 3.1 for full text of the consultations which are also summarised below;

A pre-application meeting was held on the 16<sup>th</sup> January 2018 between Olive Slattery of Waterford City & County Council (WCCC) and Pat Brett of Knocknamona Windfarm to discuss the 2019 KWF Grid Connection application. WCCC advised that "in addition to the environmental impacts of the proposed works and the proposed revisions [to the grid connection and haul route proposed in the Knocknamona Windfarm 2015 Application], the EIAR which will accompany the application, must also consider the environmental impacts of the approved wind turbines.". This meeting informed the scoping for EIAR 2023. Throughout the EIAR consideration is given to the environmental impacts of the approved wind turbines in the evaluation of cumulative and whole Knocknamona Windfarm project impacts. See consultation on pdf Page 15 of Appendix 3.1

On 28<sup>th</sup> August 2019, during the planning process for the 2019 KWF Grid Connection application, a meeting was held between Josephine McGrath, WCCC Area Roads Engineer and Jack Brett, Knocknamona Windfarm to discuss the WCCC Request for Further Information (RFI). Discussed at the meeting was the form of the response to RFI in particular with regard to the haul route involved in the development and whether a Road Safety Audit is required in the absence of works on the public road; and the form of a precondition survey of the local roads, a structural inspection of bridges and culverts along the regional and local roads, and a Traffic & Transport Assessment Report (TTAR) of existing and increased traffic along the haul route. This discussion informed the technical appendices to EIAR 2023 Chapter 12: Material Assets. See consultation on pdf Page 16-19 of Appendix 3.1

Also in August 2019, consultation was held between Rosemary Ryall, Conservation Officer of WCCC and James Powell BSc MIEI CEng, Chartered Engineer (specialist in Applied Building Repair and Conservation) representing Knocknamona Windfarm, about the content of an Architectural Heritage Impact Assessment (AHIA) to be submitted as part of a response to RFI on the 2019 application. It was advised that an AHIA should include assessment of all historic bridges, culverts, gateways and entrance screens, rubblestone boundary walls and any other features of vernacular interest which are either of architectural heritage merit in their own right or contribute to the character of an area. It was advised that the study area to be included in the AHIA shall include the haul routes on R671, L2019, L6074 and L60741 where impact may occur by reason of the

construction traffic and abnormal loads. This discussion informed the evaluation and Appendix 13.2 of EIAR 2023 Chapter 13: Cultural Heritage.

In addition, in August 2019 Cóilín Ó Drisceoil MA MIAI of Kilkenny Archaeology (who prepared the Cultural Heritage Chapter and Appendices for the 2019 application), contacted the Underwater Archaeology section of the Department of Culture, Heritage and the Gaeltacht regarding the requirements or otherwise of an Archaeological Impact Assessment AIA /Underwater Archaeological Impact Assessment UAIA for this development site. Dr Connie Ní Chéilleachair of the Underwater Archaeology Unit confirmed that 'if there are no watercourses then the UAIA will not be required'. In compliance with the requirement for assessment of Cultural Heritage under the EIA Directive, an AIA was carried out in EIAR 2023 - Chapter 13: Cultural Heritage. There are no watercourses on site and therefore an UAIA was not required in EIAR 2023. See consultation on pdf Page 20 - 24 of Appendix 3.1.

#### Appendix (at the end of this chapter)

Appendix 3.1: Consultation with WCCC Planning and Roads departments and with the DAU.

# 3.3 Consultation with Statutory Bodies and Other Parties

Scoping consultations were carried out with statutory bodies including the environmental authorities and local and regional authorities, NGOs and other parties who were likely to have either or both, a thematically specific or area specific concerns in relation to KWF Grid Connection.

Consultations were in the form of a written scoping document and mapping. The list of consultees and any feedback is set out in Table 3-1 below. A sample consultation letter and any replies received are submitted in full in Appendix 3.2: Consultation with Statutory Bodies and Other Parties at the end of this chapter.

Table 3-1: Statutory Consultees, Other Agencies or Bodies Contacted

Consultee	Type of Consultation	Summary of Feedback
Transport Infrastructure Ireland (TII)	Written Consultation 08/02/2022	Reply email 18/02/2022 comprising general guidance with respect to EIAR scoping issues, which may affect the National Roads Network. TII best practice publications including <i>Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes</i> and <i>Guidelines for the Treatment of Noise and Vibration in National Road Schemes</i> are also recommended. The TII advice where relevant to the project has informed Chapter 12: Material Assets.  See Reply from Tii in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Developments Application Unit (DAU)	Written Consultation 08/02/2022	DAU responded by email on 9 <sup>th</sup> February 2022 to say that In the event of observations, Knocknamona Windfarm will receive a coordinated heritage-related response by email from Development Applications Unit (DAU).  No observations have been received to date.  See Reply from DAU in Appendix 3.2: Consultation with Statutory

	Type of	
Consultee	Consultation	Summary of Feedback
		Bodies & Other Parties
Irish Aviation Authority – Safety Regulation Division	Written Consultation 08/02/2022	Reply email 15/02/2022 stating that IAA's Safety Regulation Division - Aerodromes has no requirements for incorporation into the Planning and Environmental Considerations Report and that the Knocknamona Windfarm scoping letter has been forwarded to other domains within the Authority who may have further comments, i.e. IAA's Air Navigation Service Provider (ANSD), En-
		route Engineering et.  See Reply from IAA in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Irish Aviation Authority - Air Navigation Services Division (ANSD)	Written Consultation 08/02/2022	Email 15/02/2022 stating that ANSD does not get involved in the planning process and sets out general post permission requirements which are not relevant to the structures in the subject KWF Grid Connection application.  See Reply from ANSD in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Health and Safety Authority	Written Consultation 08/02/2022	Reply letter dated 11/02/2022 stating that the application seems to be outside the scope of the Authority's responsibilities on technical advice and therefore the Authority has no observations. See Reply from HSA in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Uisce Eireann	Written Consultation 08/02/2022	Reply letter dated 16/02/2022 stating that it does not have the capacity to advise on scoping of individual projects but advised that certain aspects of Water Services would be considered in the scope of an EIAR where relevant. The issues mentioned have been fully addressed in Chapter 12: Material Assets.  See reply from IW in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Fáilte Ireland	Written Consultation 08/02/2022	No reply.  In response to previous consultation on 11/07/2018 Fáilte Ireland recommended that their 2011 "Guidelines for the treatment of tourism in an Environmental Impact Statement" should be taken into account. The guidelines mentioned have informed the evaluation of tourism in Chapter 6: Population & Human Health.  See Reply from GSI in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Geological Survey of Ireland	Written Consultation 08/02/2022	Reply dated 09/03/2022 attaching GSI Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes. The dataset and supporting information provided informed the evaluation in the EIAR and in particular in chapters covering Land & Soil, Water, Climate, Landscape, Air, Material Assets and Cultural Heritage.

Consultee	Type of Consultation	Summary of Feedback
		See Reply from GSI in Appendix 3.2: Consultation with Statutory Bodies & Other Parties
Department of the Environment, Climate & Communications,	Written Consultation 08/02/2022	Bodies & Other Parties  No reply
Environmental Protection Agency, Office of Climate, Licensing & Resource Use.	Written Consultation 08/02/2022	No reply
Health Services Executive - Naas	Written Consultation 08/02/2022	No reply
Department of Agriculture, Food and the Marine	Written Consultation 08/02/2022	09/02/2022 acknowledgement of consultation. No reply to date.
Southern Regional Assembly	Written Consultation 08/02/2022	No reply
The Heritage Council	Written Consultation 08/02/2022	No reply
Sustainable Energy Authority of Ireland (SEAI)	Written Consultation 08/02/2022	No reply
Arts Council of Ireland	Written Consultation 08/02/2022	No reply
Friends of the Irish Environment	Written Consultation 08/02/2022	No reply
Commission for Energy Regulation	Written	No reply
An Taisce	Written	No reply
Office of Public Works	Written	No reply

#### Appendix (at the end of this chapter)

Appendix 3.2: Consultation with Statutory Bodies & Other Parties

# PRICEINED: OS OO SO.

#### 3.4 Consultation with the Public

Provision of notice to the general public on projects subject to EIA, is through the EIA Portal hosted by the Department of Housing, Planning and Local Government prior to the lodging of the application with the Local Authority. The EIA Portal is an online map-based website that provides users with information on current applications for development consent which are accompanied by an Environmental Impact Assessment Report. Access through

http://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1 Portal ID Number 2023153

Public Site Notices will be erected in the locality and a Notice will be placed in a local newspaper as prescribed by Waterford City & County Council, prior to the application being submitted.

Once the planning application is validated, the planning application documents will be available to view at the offices of Waterford City & County Council and on the Council's website

http://www.waterfordcouncil.ie/departments/planning/planning-enquiries/online-planning-enquiries.htm
The planning application and accompanying documents can also be accessed and viewed through registering on the Local Government Ireland Planning Portal https://planning.localgov.ie/

The public can then make their views known to Waterford City & County Council, during the statutory consultation period of 5 weeks from the planning application validation date - in writing to The Planning Department, Waterford City & County Council, Menapia Building, The Mall, Waterford. The public can also participate online by registering on the Local Government Ireland Planning Portal <a href="https://planning.localgov.ie/en/submission/create">https://planning.localgov.ie/en/submission/create</a>. Any submissions received are taken into account by the planning authority when making their decision, thus ensuring effective public participation in the decision-making process.

In addition all residents within 500m of the civil and electrical works were contacted prior to the submission of the planning application.

Appendix 3.1: Consultation with WCCC Planning and Roads departments and with the DAU

PROPRIES OF THE PROPRIES

# WATERFORD CITY AND COUNTY COUNCIL,

## PLANNING DEPARTMENT, MENAPIA BUILDING, THE MALL, WATERFORD.

Email: planning@waterfordcouncil.ie Telephone: 0818 102020

PRE-PLANNING APPLICATION FORM

## PLEASE ENSURE ALL QUESTIONS ARE ANSWERED

## APPLICANT(S) DETAILS

- 1. Name of Applicant: KNOCKNAMONA WINDFARM LIMITED
- 2. **Address of Applicant:**

ZETEC HOUSE, IDA PURCELLSINCH BUSINESS PARK, KILKENNY R95 PX5X

3. Telephone No.

Office; 056 7750140 (EXT. 201): Mobile Phil Kenealy 086 8399193

**Email Address** 

pk@ecopower.ie

4... I confirm that I am the legal owner of the site

YES — LEASE HOLDER

(If NO, written consent from the landowner must be submitted with this application)

# **AGENT'S DETAILS**

N/A

5.	Name of Agent: 6.	Address		of	Agent:
7.	Business Telephone:		Email:		

NB The majority of Pre-Planning Enquiries are responded to by EMAIL and/or TELECHONE CALL at date and time that is provided in acknowledgement EMAIL.

#### PROPOSED DEVELOPMENT DETAILS

# 8. Brief Description of Proposed Development - KWF GRID CONNECTION

KWF Grid Connection is proposed for a location 8km west of Dungarvan, County Waterford and just east of the existing operational ESB Woodhouse Substation and Woodhouse Windfarm. The development is the grid connection element required to connect the authorised but not yet constructed Knocknamona Windfarm to the National Grid. The KWF Grid Connection proposal comprises 1940m of underground cabling, additional electrical plant and apparatus in the operational Woodhouse Substation; the use of the existing main entrance and windfarm road network at Woodhouse Windfarm; the construction of a new 190m long Link Road joining the Woodhouse Windfarm road network to the Knocknamona Windfarm road network and widening of c.960m of existing forestry road to facilitate deliveries of turbine components to Knocknamona Windfarm.

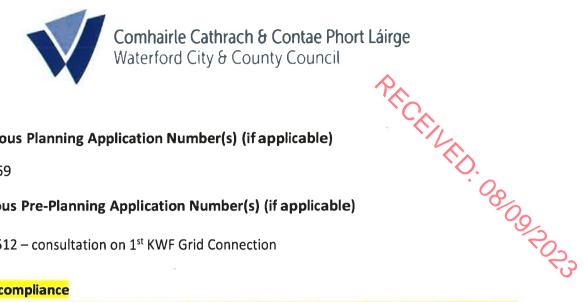
The forthcoming Application is the 2<sup>nd</sup> planning application for grid connection works for Knocknamona Windfarm. The previous KWF Grid Connection application was made in 2019 and was authorised firstly by Waterford City & County Council (WCCC File Ref. 19/369) on 18 December 2019 and subsequently on appeal by An Bord Pleanála (ABP Ref. 306497-20) on 18 February 2021. This decision was challenged through Judicial Review to the High Court by 3<sup>rd</sup> Parties who are opposed to the proposed development (proceedings titled Reynolds & Ors v An Bord Pleanála High Court Record Number 2021 302 JR). Finally, in December 2022 and prior to the High Court hearing on the matter, the Board decided not to oppose the challenge to their decision because they accepted that the Board meeting held on 22 April 2020, at which the Board decided whether an oral hearing should be held, did not have the requisite quorum. The Board therefore decided that it's Decision of 18 February 2021 granting KWF Grid Connection ought to be quashed on that basis. Subsequently, a Final Order quashing the Board's Grant of Permission for the KWF Grid Connection application of 2019, was made by the High Court and perfected on 28<sup>th</sup> February 2023.

Therefore, as a consequence Knocknamona Windfarm Limited must now apply for the KWF Grid Connection anew. The proposed development KWF Grid Connection 2023 is the same as KWF Grid Connection 2019. A new EIA Report 2023 and Appropriate Assessment Reporting 2023 will be presented in order to account for the passage of time in relation to legislation, guidelines, conditions on site and in the surrounding area and any other Environmental Impact Assessment and Appropriate Assessment related matters that ought to be considered under the EIA Directive and Habitats Directive at this point.

A pre-planning consultation with Oonagh Labros on KWF Grid Connection 2019 was emailed to <a href="mailto:pbrett@ecopower.ie">pbrett@ecopower.ie</a> on 8/02/2018. Ref. 2017/512. The contents of the proposed KWF Grid Connection 2023 application is the same as the KWF Gird Connection 2019 application. Should Waterford City & County Council have additional comments or requirements to the 2018 consultation, please advise. The February 2018 consultation is attached FYI along with the site location map.

#### 9. Location/Townland of proposed development

Knocknamona and Keereen Upper townlands, 8km west of Dungarvan, County Waterford



10. **Previous Planning Application Number(s) (if applicable)** 

19/369

11. Previous Pre-Planning Application Number(s) (if applicable)

2017/512 - consultation on 1st KWF Grid Connection

#### 12. GDPR compliance

In the event that a planning application is made following this pre-planning application, the contents of this pre-planning application will be placed on the planning file for public inspection and displayed on our website www.waterfordcouncil.ie. I hereby consent to this data being processed in this manner.

Please do not include any documents or information with this application that you do not wish to be made public

Signature of Applicant/Agent: 13.

N.B. It is essential that you attach an appropriate map which clearly outlines the location and extent of the proposal site. Failure to do so will result in your pre-planning consultation application being returned to you.

Maps can be printed from www.waterfordcouncil.ie - Planning.

Please complete and return this form to: Planning Department

Waterford City and County Council

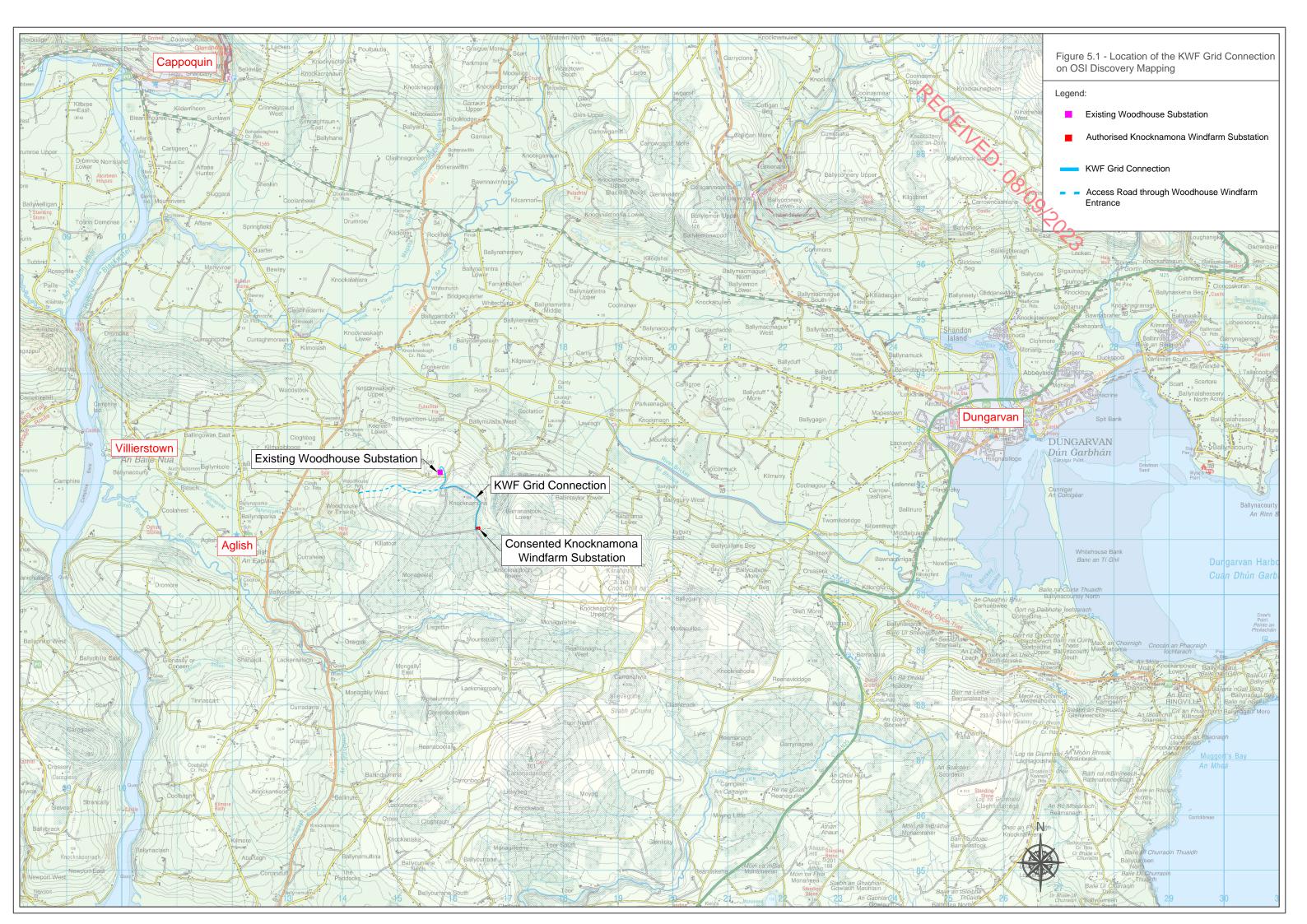
1<sup>st</sup> Floor, Menapia Building, The Mall, Waterford

OR email to: planning@waterfordcouncil.ie

On receipt of this completed application form a time/date will be allocated to you for your pre- planning response. In submitting this application form you are advised to furnish the Planning Department with any additional information that may be of benefit to the pre-planning consultation.

#### Qualification

Please note that any advice is given in good faith and without prejudice to the formal consideration of any subsequent planning application. Article 247(3) of the Planning and Development Act 2000 states that 'the carrying out of consultations shall not prejudice the performance by a planning authority of any other of its functions under this act, or any regulation made under this act and cannot be relied upon in the formal planning process or in legal proceedings.' Formal consideration of an application is necessarily more extensive than consideration at the pre-application stage because of the consideration of internal reports, e.g. from environment, roads or sanitary services section and submissions from a third party or prescribed bodies.



# **Phil Kenealy**

From: Lee-Ann McGrath < Imcgrath@waterfordcouncil.ie>

Sent: Friday 18 August 2023 12:12

Phil Kenealy To:

PQ2023324 - PRE PLANNING-KNOCKNAMONA WINDFARM LTD. Subject:



PRE PLANNING ENQUIRY REF. NO. PQ2023/324, Keereen RE: Upper/Woodhouse or, Tinakilly/Knocknamona, CO. WATERFORD.



Dear Sir/Madam,

I wish to acknowledge receipt of your pre planning application relating to the above. The assigned planner will contact you in due course.

Regards,

L. McGrath, Clerical Officer, The Planning Dept.

# **Phil Kenealy**

From: Olive Slattery <oslattery@waterfordcouncil.ie>

**Sent:** 08 February 2018 09:18

To: Pat Brett
Cc: Oonagh Labros

**Subject:** 2017/512 pre planning summary

Follow Up Flag: Follow up Flag Status: Flagged

Hello Pat,

I hope you are well.

Apologies for the delay in issuing the following written summary of our discussions held on 16th January relating to Knocknamona windfarm.

PECENED: OSOOROS

#### Background:

Planning permission was refused by the Council for the erection of 12 wind turbines (ref: 14/600109). Importantly, the application did not include a grid connection and haul route. The Council's decision was appealed and ABP granted Planning permission for 8 wind turbines.

Local residents brought judicial review proceedings in relation to this decision and had their application for an order quashing this decision refused in the High Court. Mr Justice Robert Houghton was satisfied that assessments were made in line with *O'Grianna*, and that all arguments in relation to the grid connection and haul route were not sustainable due to the fact that planning permission did not include these works. Importantly, the EIS considered the environmental impacts of the grid connection and haul route but did not grant planning permission for these works.

#### Discussions held:

At our meeting, you advised that you intend to apply for planning permission for the proposed Grid connection and haul route. The following will also be sought:

- 1) Revised route for Grid connection, which was not considered in the EIS but would be considerably closer to the turbines.
- 2) Revised haul route, which was not considered in the EIS.
- 3) Revised (larger) layout of the substation compound

You are advised that in addition to the environmental impacts of the proposed works and the proposed revisions, the EIAR (which will accompany the application) must also consider the environmental impacts of the approved wind turbines. A full assessment of the proposal will be undertaken once an application has been submitted for consideration.

Kind regards,

Olive Slattery
Assistant Planner

# ----- Email message Start -----

From: Jack Brett (Knocknamona Windfarm Limited)

**Sent:** Tuesday 6 August 2019 07:40

To: Josephine McGrath (Waterford City & County Council Area Roads Engineer)

PRICENED: OBJOD PORS Subject: Knocknamona Windfarm Grid Connection - Further Information Request

Dear Josephine

I trust you are well and busy.

In the last 2 months we submitted a planning application to Waterford City and County Council for Knocknamona Windfarm Grid Connection, planning reference 19/369. The KWF Grid Connection development consists of underground cabling, additional electrical plant and apparatus in an existing substation, the construction a new link road (on private lands) and the widening of an existing forestry road. Waterford City and County Council have requested Further Information and have requested a Road Safety Audit for the subject haul routes (RFI Question 1C below) and a precondition survey of public roadways, including bridge crossings, affected by proposed development works and associated traffic movements (RFI Question 1D below). Before I commission this work, I wish to confirm with you which public roads are within the scope of these surveys. Can you please confirm if you are satisfied with the public roads listed for each survey below:

#### **Road Safety Audit**

From Cappagh Quarry to N72: L2018 and L2019

From R671 junction to Site Entrances: L6074 and L60741

Please note, as stated in Chapter 12: Material Assets and Appendix 12.1 of the planning application submitted reports, No works to road boundaries or widening of roads are required for either the installation of the underground cabling, or site access, or delivery of materials or abnormal loads as this route has already been used to deliver turbines of similar size to Woodhouse Windfarm.

## **Precondition Survey – Public Roadways**

From Cappagh Quarry to N72: L2018 and L2019

From R671 junction to Site Entrances: L6074 and L60741

## **Precondition Survey – Bridges**

From Cappagh Quarry to N72: L2018 and L2019

From the N72 Junction to Site Entrances: R671, L6074 and L60741

Regarding the Precondition Survey – Bridges, I propose surveys along the regional road and local road networks of the turbine component haul route. The Turbines will be delivered to Belview Port and will be transported c.60km along the National Roads N29, N25, and N72 to the junction of the Regional Road R671. In addition I propose including the local roads L2018 and L2019 from Cappagh quarry, stone and concrete supplier, in the scope of the bridge survey.

For reference, see attached figures which accompanied the grid connection planning application which show the material deliveries haul route and turbine component haul route and the location of the roads list above. Also see below relevant extract from the Request for Further information, planning reference 19/369.

#### Questions 1

- c) The applicant is requested to prepare a Road Safety Audit for the subject haul routes associated with the current application (both construction traffic and extraordinary loads). Same shall also Audit the previously carried out junction improvements and works along the subject haul route.
- d) The applicant is requested to prepare and submit a precondition survey of public roadways, including bridge crossings, affected by proposed development works and associated traffic movements.

Thank you for your time in confirming the above.

Kind regards Jack Brett

## **Jack Brett - Ecopower Developments Limited**

Zetec House - Purcellsinch IDA Business Park - Dublin Road - Kilkenny - R95 WKK6

T: 056-7750140 (Ext 203) - M: 086-3575310

----- Email message Start -----

From: Jack Brett (Knocknamona Windfarm Limited)

Sent: Thursday 29 August 2019 08:02

To: Josephine McGrath (Waterford City & County Council Area Roads Engineer)

Subject: RE: Knocknamona Windfarm Grid Connection - Further Information Request planning

reference 19/369

Hi Josephine,

Thank you for facilitating a meeting yesterday. It was very helpful and I appreciate the time you provided.

See below in relation to Knocknamona Windfarm Grid Connection response to Further Information Request, planning reference 19/369 – Question 1C and 1D. See also attached map of delivery routes and Further Information Request letter for reference.

As discussed please confirm you are satisfied with the below survey routes and that a road safety audit is no longer required. See below details:

Question 1 C): Road Safety Audit.

A Road Safety Audit is no longer required as there is no modifications to the public road junctions proposed under the subject development. However, the Keereen Upper section of the L6074 (from the junction with the L60741 to the Woodhouse Substation) is a single lane road and an assessment needs to be carried out of HGV deliveries on this road with respect to HGVs and cars passing each other. Looking at laybys and inter-visibility of traffic.

Route to survey: Keereen Upper section of L6074 – A Road Safety Assessment, including laybys as part of a Traffic Impact Assessment, as requested in RFI Question 1A.

Question 1 D): Precondition Survey of Public Roadways and Bridges

A video survey and pavement condition index survey of road pavements and a survey of the condition of bridges will be carried out on the below regional road and local roads:

Route to survey: L2018 (form Cappagh Quarry), L2019, R671, L6074 (to Woodhouse Substation) and L60741 (to Woodhouse Windfarm Site Entrance).

Regards

Jack Brett

**Jack Brett - Ecopower Developments Limited** 

Zetec House - Purcellsinch IDA Business Park - Dublin Road - Kilkenny - R95 WKK6

T: 056-7750140 (Ext 203) - M: 086-3575310

Email message Start
From: Josephine McGrath (Waterford City & County Council Roads Engineer)
From: Josephine McGrath (Waterford City & County Council Roads Engineer)  Date: 9 October 2019 at 15:45:54 IST  To: Jack Brett (Knocknamona Windfarm Limited)  Subject: RE: Knocknamona Windfarm Grid Connection - Further Information Request planning reference 19/369
Jack,
I sent email to Aidan Walsh - planner - confirming that we met and agreed the road survey as outlined below.
Regards
Josephine
Email message End

------ Email message Start -----
From: Cóilín Ó Drisceoil (Kilkenny Archaeology)

Sent: Thursday, August 08, 2019 11:19 AM

To: Connie Kelleher (Department of Culture, Heritage and the Gaeltacht)

Subject: 18600913 Ecopower - Knocknamona Windfarm Grid Connection Request for Further Information

Our client Ecopower Developments have requested clarification on Item 6 of Waterford City & County Council's Further Information request for the Knocknamona windfarm grid connection project. Item 6 requests an UAIA but as you can see from the attached map there are no watercourses along the grid connection route. Can you clarify whether this is still required and if so what the scope of the assessment should be?

Further Information Reguest – Question 6

Development Applications Unit (DAU), Department of Culture, Heritage and the Gaeltacht has considered the proposal. The area that is to be the subject of investigation/works is large in scale. There is therefore a high potential that cultural heritage, including underwater cultural heritage in rivers and streams, could be impacted by the proposed works. The applicant is therefore requested to prepare and submit an Archaeological Impact Assessment (AIA) that includes an Underwater Archaeological Impact Assessment (UAIA) and same should be carried out as per the following:

- a) The applicants shall engage the services of a suitably qualified and suitably expe rienced
- archaeologist to carry out the AIA and an archaeologist with underwater/rive
- experience to assess via an UAIA any watercourses within the footprint of the prop
- works, including any plant and machinery provisions(haul roads, trackways, acce ss routes, works compounds, etc.).
- b) The AIA/UAIA shall be carried out in advance of any physical investigations, such as gra b sampling/bore hole or site investigation operations.
  - c) The AIA/UAIA shall include a detailed desktop study that assesses all available so urces to
  - inform on the cultural heritage of the landscape and environment of the area.
- d) The AIA/UAIA shall be licenced by the Department of Culture, Heritage and th e Gaeltacht and a detailed method statement shall accompany the application.
  - e) The AIA/UAIA shall comprise walkover survey accompanied by metal detection s urvey of any riverine or stream locations.
- f) Recommendations in the resultant AIA/UAIA report shall include an informed Impa

ct

Statement, including putting forward archaeological recommendations to mitigate any identified impact to known/recorded or potential cultural heritage.

g) UAIA Report should be forwarded to the Underwater Archaeology section of the Department of Culture, Heritage and the Gaeltacht for consideration and further comment 36/09/2013

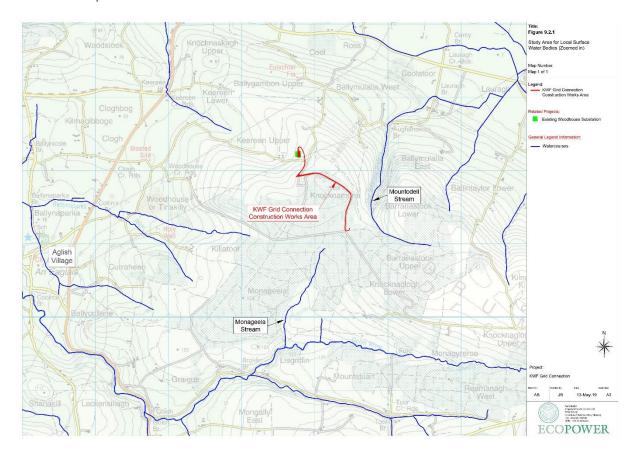
Should you require any additional information please do not hesitate to contact me.

All the best,

Cóilín

CÓILÍN Ó DRISCEOIL MA MIAI Managing Director KILKENNY ARCHAEOLOGY

#### Attached map:



----- Email message Start -----

From: Connie Kelleher (Department of Culture, Heritage and the Gaeltacht)

Date: Thu, 8 Aug 2019 at 17:01

Subject: RE: 18600913 Ecopower - Knocknamona Windfarm Grid Connection Request for Further

Information

To: Cóilín Ó Drisceoil (Kilkenny Archaeology)

Hi Cóilín,

If there are no watercourses, then the UAIA will not be required. It is standard to request this as part of the appropriate cultural heritage assessment for windfarms but if it is not necessary, then we are fine with just the AIA being done, and it can state that there were no watercourses within the footprint of the works for the windfarm.

Let me know if you need anything else.
Connie

Dr Connie Ní Chéilleachair - Dr Connie Kelleher

Aonad Seandálaíochta Faoi Uisce - *Underwater Archaeology Unit* Seirbhís Séadchomharthaí Náisiúnta - *National Monuments Service* 

An Roinn Cultúir, Oidhreachta agus Gaeltachta Department of Culture, Heritage and the Gaeltacht Office of Public Works National Monuments Depot, Carrigfreaghane, Muckross Road, Killarney, Co. Kerry.

------ Email message Start -----From: Cóilín Ó Drisceoil (Kilkenny Archaeology)
Date: Thu, 8 Aug 2019 at 17:04
Subject: RE: 18600913 Ecopower - Knocknamona Windfarm Grid Connection Request for Further Information

See below re Underwater AIA for Knocknamona.

Since the standard AIA has already been done I presume this means that item of the FI request is covered off now.

All the best

Cóilín

CÓILÍN Ó DRISCEOIL MA MIAI **Managing Director** KILKENNY ARCHAEOLOGY

# **Appendix 3.2: Consultation with Statutory Bodies and Other Parties**

# Appendix 3.2 Consultation with Statutory Bodies and Other Parties

Scoping consultations were carried out with statutory bodies including the environmental authorities and local and regional authorities, NGOs and other parties who were likely to have either or both, a thematically specific or area specific concerns in relation to KWF Grid Connection.

Consultations were in the form of a written scoping document and mapping. The list of consultation letter and any replies received copied below.

Transport Infrastructure Ireland Parkgate Business Centre, Parkgate Street, Dublin 8 D08 DK10	The Manager, Development Applications Unit Department of Housing, Local Government & Heritage Custom House Dublin D01 W6X0
Irish Aviation Authority, The Times Building, 11-12 D'Olier Street, Dublin 2 D02 T449	Workplace Contact Unit Health and Safety Authority Metropolitan Building, James Joyce Street, Dublin 1 D01 K0Y8
Planning Department Uisce Éireann, PO Box 860, South City Delivery Office Cork City	Fáilte Ireland, 88 - 95 Amiens Street, Dublin 1 D01 WR86
Geological Survey of Ireland Block 1 Booterstown Hall Booterstown, Blackrock, County Dublin A94 N2R6	Department of Communications, Climate Action & the Environment, 29-31 Adelaide Road Dublin 2 D02 X285
Environmental Protection Agency, Office of Climate, Licensing & Resource Use PO Box 3000, Johnstown Castle Estate, Wexford Y35 W821	Health Services Executive Oak House, Limetree Avenue, Millennium Park, Naas, Co. Kildare

The Minister Department of Agriculture, Food and the Marine Agriculture House, Kildare St. Dublin 2 D02 WK12	Southern Regional Assembly Assembly House, O'Connell Street, Waterford City X91 F8PC
The Heritage Council Church Lane Kilkenny RX95 X264	Sustainable Energy Authority of Ireland (SEAI) 3 Park Place Hatch Street Upper Dublin 2 D02 FX65
Arts Council of Ireland 70 Merrion Square South, Dublin 2 D02 NY52	Oisin Coughlan Friends of the Irish Environment Kilcatherine, Eyeries, Co. Cork
Commission for Regulation of Utilities The Exchange, Belgard Square North, Tallaght, Dublin 24 D24 PXW0	An Taisce, Tailors Hall, Back Lane, Dublin 8 D08 X2A3
Office of Public Works Head Office, Jonathon Swift Street, Trim, Co Meath C15 NX36	

Zetec House IDA Purcellsinch Business Park Kilkenny Ireland RN5 PX X Tel: +353 (0)56 7750140

The Manager,
Development Applications Unit
Department of Housing, Local Government & Heritage
Newtown Road
Wexford Y35 AP90

8<sup>th</sup> February, 2022

**Re: Scoping for KWF Grid Connection 2022** 

A chara,

Knocknamona Windfarm Limited (KWFL) is consulting on the potential environmental effects of a proposed grid connection development for Knocknamona Windfarm, to be called KWF Grid Connection. Ecopower Developments previously consulted on KWF Grid Connection by letter dated 11th July, 2018 and the development was subsequently submitted by KWFL for planning to Waterford City & County Council in May 2019 (LA Ref. 19/369). Planning was granted in December 2019 and appealed to An Bord Pleanála (ABP Ref. 306497-20). Planning was granted by Board Order in February 2021, which decision is currently subject to Judicial Review proceedings taken by 3<sup>rd</sup> Parties.

Without prejudice to these Judicial Review proceedings or to the extant grant of permission for KWF Grid Connection, the applicant KWFL has decided to submit a new KWF Grid Connection application to Waterford City & County Council. The now proposed KWF Grid Connection 2022 application is similar in principle details to the authorised KWF Grid Connection. Your response to our previous consultation in July 2018 will be taken into account in the new EIA Report. However you may have new observations in the context of the passage of time since the previous consultation.

I enclose a summary description of KWF Grid Connection 2022 along with the expected activities, resources, emissions & wastes and the potential effects on the environment, of the construction and operation of the development. I also include site location mapping at the end of the document.



# 1. Description of the proposed KWF Grid Connection

KWF Grid Connection is proposed for a location 8km west of Dungarvan, County Waterford and just east of the existing operational ESB Woodhouse Substation and Woodhouse Windfarm. The development is the grid connection element required to connect the authorised but not constructed Knocknamona Windfarm to the National Grid Knocknamona Windfarm was granted planning permission in December 2016 by An Bord Pleanála (ABP Ref. PL93.244006).

The KWF Grid Connection 2022 proposal comprises underground cabling, additional electrical plant and apparatus in the operational ESB Woodhouse Substation, the construction of 190m of new road, widening of existing forestry roads and change in layout of the plant and equipment in the previously authorised Knocknamona Windfarm Substation.

The underground cabling (1940m in length) will be made up of cables, ducts and other apparatus installed in a trench. The cables will be routed mainly through the authorised Knocknamona Windfarm roads and existing forestry roads. The cable starts in Knocknamona Windfarm substation and ends in Woodhouse Substation thus connecting Knocknamona Windfarm Substation when constructed, to the National Grid at the existing Woodhouse Substation.

The proposed additional electrical plant and apparatus in Woodhouse Substation is made up of a new control building; a new main transformer and transformer bay; two new lightening masts; and ancillary electrical equipment. Civil works within the Woodhouse Substation compound will include concrete plinths, a new access track and a new internal palisade fence and gateway and two new gateways in the existing perimeter fence of the substation compound and other ancillary works.

The proposal also includes the use of the existing main entrance and windfarm road network at Woodhouse Windfarm; the construction of a new 190m long Link Road joining the Woodhouse Windfarm road network to the Knocknamona Windfarm road network and widening of c.960m of existing forestry road to facilitate construction deliveries for Knocknamona Windfarm.

Revisions to the authorised Knocknamona Windfarm Substation may involve revisions to the layout for some substation apparatus; an extension of the permitted control building; the additional of a second control building and the expansion of the substation compound perimeter fence.

See mapping showing the **Location of the Proposed KWF Grid Connection** in context of the whole Knocknamona Windfarm project, at the end of this document.



# 2. Activities, Resources, Emissions & Wastes

Construction works for the underground cabling, link road and widening of existing forestry road will be completed within a period of approximately 2 months, and will involve two works crews, each made up of 3 – 4 personnel. During underground cabling works and road works machinery to be used during construction will include a large excavatory dump truck and cable pulling machines. Soil excavated for the trench and new road will be temporarily stored, before being used to reinstate the trench and road. A semi-dry mix concrete may be required in the trench to surround the cable ducts. The land over the cabling and road will be reinstated, with the only surface expression being two joint bay, man-hole type covers on the cable route.

The installation works and commissioning of the electrical plant in Woodhouse Substation will take approximately 4 months, and will be carried out by one work crew, made up of 8-10 personnel and one electrical commissioning team of 4-5 personnel.

Construction access will be through the existing Woodhouse Substation entrance on the L6074 at Keereen Upper and through the existing Woodhouse Windfarm main entrance on the L60741 Local Road. Construction vehicles will also use the authorised Knocknamona Windfarm entrance to the east of the site.

The Knocknamona Windfarm Substation (revised layout) will be constructed during the Knocknamona Windfarm construction works and the Knocknamona Windfarm construction resources and facilities will be utilised. There will be no requirement for additional lands; or changes of land use; or land cover because the revised layout will not exceed the permitted hard-core footprint of Knocknamona Windfarm Substation.

The construction waste streams for KWF Grid Connection 2022 will be managed under the authorised Knocknamona Windfarm Environmental Management Plan.

#### 3. Potential Effects on the Environment

<u>Population and Human Health</u>: The immediate area around the works is sparsely populated, the nearest house is c.320m away from the site location. A waymarked way (St Declan's Way) is 1km to the west.

<u>Biodiversity:</u> The nearest European Sites are Dungarvan Harbour SPA, 7km to the east and the Blackwater River (Cork/Waterford) SAC, 3km to the northwest. The nearest National Site is the Blackwater River and Estuary pNHA, 5km to the east.

The permitted Knocknamona Windfarm and Substation is located in commercial forestry plantation and the majority of the proposed underground cabling is routed under existing forestry roads. The proposed new access road is mainly located in cleared forestry with a very small portion on rough grassland.



There will be no permanent land-use change. There are no stream crossings required. There is potential for temporary disturbance and displacement effects to animals and birds, during construction works.

<u>Land & Soils:</u> There will be no permanent change of land-use: some soil will be excavated from the trench and new access road during construction works, however all of this soil will be used to reinstate the cabling works area and cover the new access road.

<u>Water:</u> No stream crossings will be required: the nearest watercourse is Roaring Waters, c.300m to the east.

<u>Air:</u> Minimal dust and noise can be expected during construction works. Very low levels of EMF, from the operating electrical components, can also be expected. The nearest house is c.320m distant in Keereen Upper.

<u>Climate:</u> The emissions from construction vehicles and excavations will be minimal. However, the development will facilitate the connection of Knocknamona Windfarm and thereby export renewable electricity (RE-E) to the national grid, contributing to government targets of 70% of RE-E on the National Grid by 2030.

<u>Material Assets:</u> There will be trenching works across/along one public road in Keereen Upper. Construction traffic will access the works areas through the permitted Knocknamona Windfarm Site Entrance.

<u>Cultural Heritage:</u> The nearest RMP (WA030054) is an Earthwork in Keereen Upper, c.180m to the west of the proposed development.

<u>Landscape</u>: the appearance of the revised layout to the permitted Knocknamona Windfarm substation will be consistent with the character of the permitted structures. The cabling will be undergrounded, and all lands will be reinstated over the cables. The additional plant, building and apparatus proposed for Woodhouse substation will be consistent with the existing use.

#### 4. Consultation Period

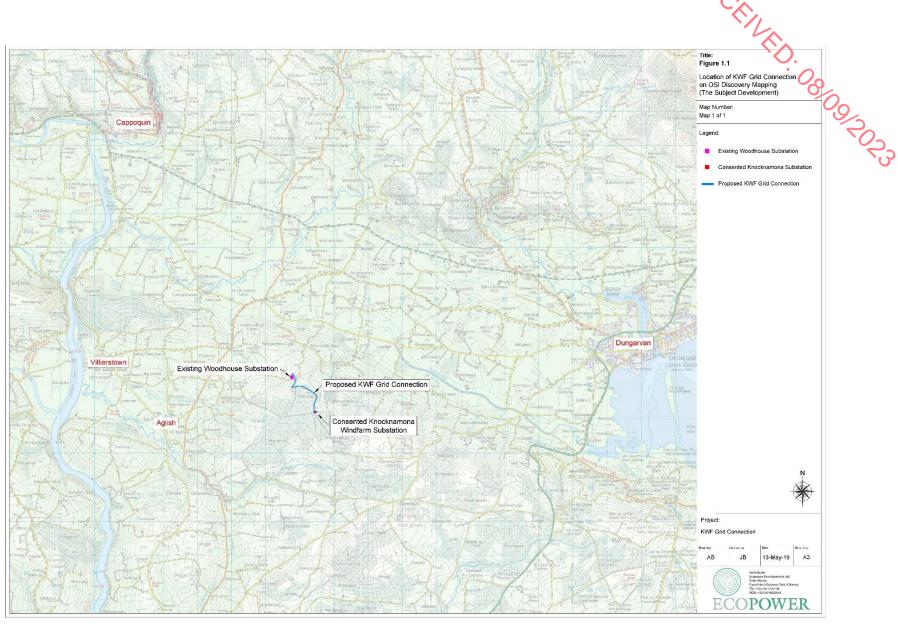
I would be obliged if you would respond to this scoping consultation, advising us of any particular concerns or matters you would like examined at this time. The consultation period is open for 30 days i.e. **until 10th March, 2022**.

Please reply to me, Julie Brett at jb@ecopower.ie or my at 086 831 2014.

Yours Sincerely,

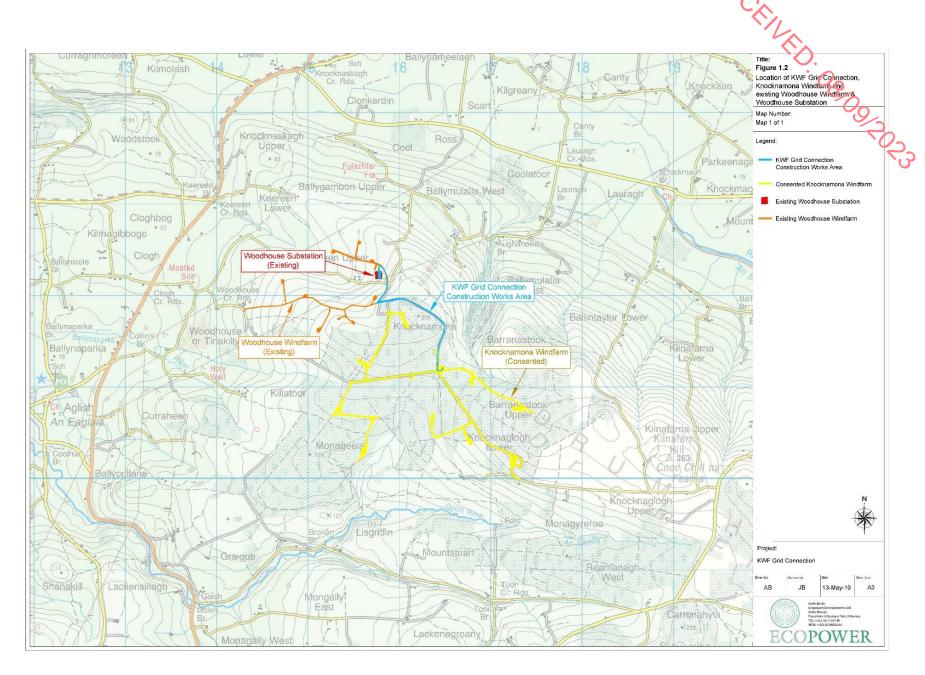
Julie Brett, KWF Grid Connection 2022 EIAR Co-Ordinator





Consultation on KWF Grid Connection 2022





# Phil Kenealy

From: Julie Brett

Sent: Tuesday 7 June 2022 15:43

To: Phil Kenealy

FW: Scoping for KWF GRID Connection 2022 - Knocknamona Windfarm Limited. Subject:

From: INFO <Information@tii.ie> **Sent:** Friday 18 February 2022 12:28 To: Julie Brett <jb@ecopower.ie>

Subject: Scoping for KWF GRID Connection 2022 - Knocknamona Windfarm Limited.

#### Dear Ms Brett,

I refer to your letter of 8 February 2022 in connection with 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.Tll.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 Roads Network.

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

- It appears that the proposed windfarm site accesses the local and regional road network prior to access to the national road network. Access to the road network shall be developed in accordance with official policy and road safety considerations, as outlined above. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to 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 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,
- 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 (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.

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

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

In the context of the existing national 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 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 interurban 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 the extensive existing local road network, or alternatives, as opposed to the strategic national road network contrary to the provisions of official policy.

Other consents or licences may be required from the road authority for any trenching or cabling proposals crossing the national road. 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, 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 practise.

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

Raymond Foley
Regulatory & Administration Unit



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 <a href="https://www.tii.ie/about/about-tii/Data-Protection/">https://www.tii.ie/about/about-tii/Data-Protection/</a>

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

# Phil Kenealy

From:

Sent:

To:

Housing Manager DAU <Manager.DAU@housing.gov.ie>
Tuesday 8 February 2022 16:19
Phil Kenealy
RE: Pre-Application Consultation Knocknamona Windfarm Grid Connection Subject:

**Follow Up Flag:** Flag Status:

Our Ref: G Pre00024/2022 (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: Phil Kenealy <pk@ecopower.ie> Sent: Tuesday 8 February 2022 13:23

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

Subject: Pre-Application Consultation Knocknamona Windfarm Grid Connection

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk at help.it@per.gov.ie

I attach pre-application consultation for your consideration.

Kind regards

Philomena Kenealy

Ecopower Limited

Zetec House, Purcellsinch IDA Business Park

Dublin Road, Kilkenny, R95 PX5X

Tel: 056-7750140 (Ext 201)

Mob: 086-8399193

PRCRINED: OBJODIZO23

# **Phil Kenealy**

From: Julie Brett Sent: Tuesday 7 June 2022 15:47 To: Phil Kenealy FW: Scoping for Knocknamona Windfarm Limited - Scoping for KWF Grid Connection 2022 Subject: From: O'LEARY Geraldine < Geraldine. O'LEARY@IAA.ie> Sent: Tuesday 15 February 2022 12:19 To: Julie Brett <jb@ecopower.ie> Subject: Scoping for Knocknamona Windfarm Limited - Scoping for KWF Grid Connection 2022 Re: Scoping for KWF Grid Connection 2022. F.A.O. Julie Brett Dear Ms. Brett, Thank you for your email and associated attachment regarding the Knocknamona Windfarm Limited Grid connection proposed for a location 8km West of Dungarvan, Co. Waterford and East of the operational ESB Woodhouse substation and Woodhouse Windfarm. Based on the information provided, IAA's Safety Regulation Division -Aerodromes has no requirements for incorporation into the Planning and Environmental Considerations Report. Your email and scoping report has been forwarded to other domains within the Authority who may have further comments, i.e. IAA's Air Navigation Service Provider, En-route Engineering etc. Yours sincerely, **Deirdre Forrest Planning Department** ×

========== PLEASE consider the environment; PRINT ONLY when necessary! DISCLAIMER: This message contains information that is confidential, may be privileged and is the property of The Irish Aviation

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# **Phil Kenealy**

From: Julie Brett

**Sent:** Tuesday 7 June 2022 15:46

**To:** Phil Kenealy

Subject: FW: Scoping for Knocknamona Windfarm Limited - Scoping for KWF Grid Connection 2022

From: O'LEARY Geraldine < Geraldine. O'LEARY@IAA.ie>

Sent: Wednesday 16 February 2022 14:21

To: Julie Brett <jb@ecopower.ie>

Subject: Scoping for Knocknamona Windfarm Limited - Scoping for KWF Grid Connection 2022

Re: Scoping for KWF Grid Connection 2022.

#### F.A.O. Julie Brett

Dear Ms. Brett,

I refer to the above proposed development details, of which were forwarded to the Irish Aviation Authority.

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 <u>S.I. 215 of 2005</u>, <u>Irish Aviation Authority</u> (<u>Obstacles to Aircraft in Flight</u>), the IAA ANSD requires any person who seeks to erect a manmade object to notify the aerodrome operator of the intended operation <u>at least thirty days</u> 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 <u>IAA AIP AD 1.3 INDEX TO AERODROMES AND HELIPORTS</u>, 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 <u>at least thirty</u> <u>days</u> 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 <u>airspace@iaa.ie</u>.

The State requires electronic terrain and obstacle data (eTOD) in accordance with International Civil Aviation Organisation (ICAO) <u>Annex 15</u> requirements which shall be surveyed by <u>Ordnance Survey Ireland (OSi)</u>. 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 <u>airspace@iaa.ie</u>:

- 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

PRICEINED.
OBOO 2000

If you have any questions, please don't hesitate to contact the airspace team at <a href="mailto:airspace@iaa.ie">airspace@iaa.ie</a>.

Your sincerely

Deirdre Forrest Corporate Affairs

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#### An tÚdarás Sláinte agus Sábháilteachta Health and Safety Authority

**♦**0818 289 389 **♦** landuseplanning@hsa.ie **♦** 

PRORINGO OBOOROS

Ms Julie Brett Knocknamona Windfarm Limited By email jb@ecopower.ie

Our Ref: PAR3674

11th February 2022

Re: Knocknamona Windfarm Limited; KWF Grid Connection

Dear Ms Brett,

The Health and Safety Authority (the Authority), acting as the Central Competent Authority under the Chemicals Act (Control of Major Accident Hazards Involving Dangerous Substances) Regulations 2015 (S.I. 209 of 2015) gives technical advice to the Planning Authority when requested, under regulation 24(2) in relation to:

- (a) the siting and development of new establishments;
- (b) modifications to establishments of the type described in Regulation 12(1);
- (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting, modifications or developments may be the source of, or increase the risk or consequences of, a major accident.

Since the above-referenced application appears to be outside the scope of the Regulations, the Authority has no observations to forward.

If you have any queries please contact the undersigned.

Yours sincerely

Ita Daly Inspector,

COMAH, Chemical Production & Storage (CCPS)



Eco Power. Zetec House. IDA Purcellsinch Business Park, Kilkenny,

RN5 PX5X.

16th February 2022

Bai. D01 W. Éire

Instrument Po Box 600

Publin 1

WA07 Uisce Éireann Bosca OP 6000 Baile Átha Cliath 1 POBox 6000

Ireland

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

Re: EIAR Scoping Request - Knocknamona Windfarm Grid Connection

Dear Ms Brett,

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

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

Queries relating to the terms and EIAR response below should be directed to planning@water.ie

Yours sincerely,

Signed on behalf of Irish Water:

PP: Ali Robinson

**Yvonne Harris** 

Connections and Development Services

# **Response to EIAR Scoping Report Requests**

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

- a) Where the development proposal has the potential to impact an IW Drinking Water Source(s) the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to IWs Drinking Water Source during construction and operational phases of the development. Hydrological/hydrogeological pathways between your site and receiving waters should be identified.
- b) Where the development proposal includes backfilling of materials, the waste sampling strategy for the proposed development to ensure the material is inert.
- c) Mitigation proposed for any potential negative impacts on any water source(s), in proximity including the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) is assessed, including any impact on hydrogeology and any groundwater/surface water interactions.
- e) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from https://www.water.ie/connections/get-connected/
- f) Any up grading of water services infrastructure that would be required to accommodate the development.
- g) In relation to a development that would discharge trade effluent any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers.
- i) Any physical impact on IW assets reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) If you are considering a development proposal, you are advised to determine the location of public water services assets, possible connection points from your site/lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of your intended development to <a href="mailto:datarequests@water.ie">datarequests@water.ie</a> Other indicators or methodologies for identifying infrastructure located within your lands

are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.

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

This is not an exhaustive list.

# Please note;

- Where connection(s) to the public network is required as part of your development proposal, applicants are advised to complete the Pre Connection Enquiry process and have received a Confirmation of feasibility letter from Irish Water ahead of any planning application.
- Irish Water will not accept new surface water discharges to combined sewer networks



Guidelines on the treatment of tourism in are are Environmental Impact Statement

### 1. Introduction

Tourism is a significant component of the Irish Economy – estimated to employ approximately 205,000 people – and contributing €6.6 billion in spending to the economy in 2014. The environment is one of the main resources upon which this activity depends – so it is important that the EIS evaluates whether and how the interacting impacts of a project are likely to affect tourism resources.

The purpose of this short note is to provide guidance on how these impacts can be assessed through the existing EIA process. Undertaking an EIA is governed by the EIA Advice Notes published by the EPA. These Advice Notes contain detailed guidance on how to describe and evaluate the effects arising from a range of projects, including tourism projects.

These guidelines were written with the assistance of Conor Skehan, Head of Department of Environment and Planning, Dublin Institute of Technology.

# 2. Tourism and the Environment

There are two interactions between tourism and the environment.

- 1. Impacts caused by Tourism Projects
- 2. Impacts affecting Tourism (e.g. the quality of a destination or a tourism activity)

#### **Impacts caused by Tourism Projects**

Tourism projects can give rise to effects on the environment. These are specifically dealt with under a number of Project Types in the Advice Notes, specifically:

### 12 TOURISM AND LEISURE

- a. Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments. Project Type 20
- b. Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100. Project Type 10

- c. Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms. Project Type 28
- d. Permanent camp sites and caravan sites where the number of pitches would be greater than 100. Project Type 28
- e. Theme parks occupying an area greater than 5 hectares. Project Type 29

Figure 1 The Advice Notes contain detailed descriptions on how to describe and evaluate the effects arising from a range of tourism projects.

# **Impacts affecting Tourism**

Environmental effects of other projects on tourism are not specifically addressed in the Advice Notes. Taking account of the significance of tourism to the Irish economy a specialist topic of 'Tourism' has been prepared to facilitate a systematic evaluation of effects on this sector within the format laid down for other parts of the Environmental Impact Statement.

It is not intended that the assessment of effects on tourism should become a separate section of the Impact Statement, instead it is intended to become a specialist sub-section of the topic 'Human Beings' which is currently described in Section 2 of the Advice Notes

# 3. Tourism in the Existing Environment

#### Introduction

Visitor attitude surveys reveal that the following factors – in order of priority – are the reasons that tourists visit and enjoy Ireland:

- Beautiful scenery
- Friendly & hospitable people
- Safe & Secure
- Easy, relaxed pace of life
- Unspoilt environment
- Nature, wildlife, flora
- Interesting history & culture
- Plenty of things to see and do
- Good range of natural attractions

It is noteworthy that over half of the factors listed are environmental and that all others are related to the way of life of the people. The following describes how these factors are considered within an EIS, set out under EIA topic headings, and how they interact with tourism.

## Beautiful scenery

This is covered in the 'Landscape' Section. Particular attention needs to be paid to effects on views from existing purpose-built tourism facilities, especially hotels, as well as views from touring routes and walking trails. It is important to note that there appears to be evidence that the visitor's expectations of 'beautiful' scenery does not exclude an admiration of new modern developments – such as windfarms – which appear to be seen as indicative of an modern, informed and responsible attitude to the environment.

## Friendly & hospitable people

This is not an environmental factor though it is indirectly covered under the 'Human Beings' section of the EIS. The principal factor is the ratio of visitors to residents. This is of less significance in areas with long-established patterns of tourism.

#### Safe & Secure

This is not an environmental issue – though some of the factors that are sometimes covered under the heading of 'Human Beings' – such as social inclusion or poverty – can point to likely effects and interactions.

## Easy, relaxed pace of life

This is not an environmental issue though it is partially covered under 'Human Beings' – see comments above.

# Unspoilt environment

This is covered under the sections dealing with 'Landscape', 'Flora' and 'Fauna' and to a lesser extent under emissions to 'Water' and 'Air'. In some instances traffic congestion, especially in rural areas, can be an issue, this is usually covered within 'Material Assets'.

# Nature, wildlife, flora

This is principally covered under the headings of 'Flora' and 'Fauna' and to a lesser extent by 'Landscape', 'Water' and 'Air'. The principal issues being to avoid any effects that might reduce the health or extent of the habitats. This can occur either directly, by impinging on the site, or indirectly, through emission, that can affect the natural resources, like clean water, which the habitat depends on. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the disturbance or wear and tear of visitor numbers to such sites.

#### Interesting history & culture

This is principally covered under 'Cultural Heritage' and, to a lesser extent, under 'Human Beings'. The principal issues being to avoid damage to sites and structures of cultural, historical, archaeological or architectural significance – and to their contexts or settings. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the wear and tear of visitor numbers to such sites.

Plenty of things to see and do.

This is not an environmental issue though it is partially covered by the 'Human Beings' section, where the tourism resources of an area are described and assessed.

Good range of natural attractions

This is covered by the 'Landscape', 'Flora', 'Fauna', and 'Cultural Heritage' sections of the EIS.

# 4. Project factors affecting Tourism

#### Introduction

Tourism can be affected both by the structures or emissions of new developments as well as by interactions between new activities and tourism activities – for example the effects of high volumes of heavy goods vehicles passing through hitherto quiet, scenic, rural areas. Tourism can be affected by a number of the characteristics of the new project such as:

- New Developments
- Social Considerations
- Land-uses and Activities
- New Developments will the development stimulate or suppress demand for additional tourism development in the area? If so, what type, how much and where? Marinas, golf courses, other major sporting facilities as well as theme parks and larger conference facilities can all stimulate the emergence of new accommodation, catering and leisure facilities often within an extensive area around a new primary visitor facility. Extensive urbanisation and large scale infrastructure as well as certain processing and extractive industries all have the potential to suppress demand for additional tourism but usually only in the immediate locality of the new development. It should be noted however, that some types of new or improved large scale infrastructure such as roads can improve the visitor experience by increasing safety and comfort or can convey a sense of environmental responsibility such as wind turbines.
- Social Consideration will the development change patterns and types of activity and land use? Will it affect the demographics, economy or social dynamics of the locality?
- Land-use will there be severance, loss of rights of way or amenities, conflicts, or other changes likely to ultimately alter the character and use of the tourism resources in the surrounding area?

## **Existing Tourism**

In the area likely to be affected by the proposed development, the following attributes of tourism, or the resources that sustain tourism, should be described under the following headings.

Note that the detailed description and analysis will usually be covered in the section dealing with the relevant environmental topic – such as 'Landscape'. Only the relevant finding as to the likely significance to, or effect on, tourism needs to be summarised in this section.

#### Context

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

- Hotels, conference centres, holiday accommodation including holiday villages, holiday homes, and caravan parks.
- Visitor centres, Interpretive centres and theme parks
- Golf courses, adventure sport centres and other visitor sporting facilities
- Marinas and boating facilities
- Angling facilities
- Equestrian facilities
- Tourism-related specialist retailers and visitor facilities
- Historic and Cultural Sites
- Pedestrian, cycling, equestrian, vehicular and coach touring routes

Indicate the numbers of premises and visitors likely to be directly affected directly and indirectly.

Identify and quantify, where possible, their potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.

Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.

Indicate any commercial tourism activity which likely to be directly affected, with resultant environmental impacts.

## Character

Indicate the occupations, activities or interests of principal types of tourism in the area. – Where relevant, describe the specific environmental resources or attributes in the existing environment which each group uses or values; where relevant, indicate the time, duration or seasonality of any of those activities. For example describe the number of guides, boats and anglers who use a salmon fishery and the duration of the salmon season as well as the quantity and type of local accommodation that is believed to be used by the anglers.

## **Significance**

Indicate the significance of the principal tourism assets or activities likely to be affected. Refer to any existing formal or published designation or recognition of such significance. Where possible provide an estimate of the contribution of such

tourism activities to the local economy. For instance refer to the number of annual visitors to a tourism attraction or to the grading of a hotel.

# Sensitivity

Describe any significant concerns, fears or opposition to the development known to exist among tourism interests. 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. For instance describe the extent of a potential visual intrusion onto a site of historic significance which is the main local tourist attraction.

# 5. Impacts on Tourism

# "Do Nothing" Impact;

Describe how trends evident in the existing environment will continue and how these trends will affect tourism.

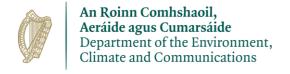
# Predicted impact;

- Describe the location, type, significance, magnitude/extent of the tourism activities or assets that are likely to be affected.
- Describe how the new development will affect the balance between longestablished and new dwellers in an area and it's affect on the cultural or linguistic distinctiveness of an area. For example describe the effect of a new multi-national population required for an international call-centre located in a Gaeltacht area.
- Describe how changes in patterns of employment, land use and economic activity arising from the proposed development will affect tourism, for example, illustrating how a new industrial development will diversify local employment opportunities thereby reducing the area's unsustainable overreliance on seasonal tourism.
- Describe the consequences of change, referring to indirect, secondary and cumulative impacts on tourism; Examples can include describing how the new development may lead to a reduced assimilative capacity for traffic or water during the peak of the tourism season or how new urbanism combined with existing patterns of tourism may lead to unsustainable levels of pedestrian traffic through a sensitive habitat.
- Describe the potential for interaction between changes induced in tourism and other uses that may affect the environment – for instance increasing new tourism-related housing affecting water resources or structures
- Describe the worst case for tourism if all mitigation measures fail.

# 6. Mitigating adverse impact on Tourism

Describe the mitigation measures proposed to:

- 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 burdens arising from the development's emissions or volumes of traffic [pedestrian and vehicular], and/or losses of amenity arising from visually conspicuous elements of the development – for example by prioritizing visual screening of views from a hotel towards a quarry.
- 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 for example by
  separating traffic routes for industrial and tourism traffic.
- remedy any unavoidable significant residual adverse effects on tourism resources or activities, for example by providing alternative access to tourism amenities – such as waterways or monuments.





Julie Brett Knocknamona Windfarm Ltd. Zetec House IDA Purcellsinch Business Park Kilkenny RN5 PX5X

Re: Scoping for Knocknamona Windfarm Grid Connection

Your Ref: n/a
Our Ref: 22/63

Dear Julie,

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 <a href="website">website</a> for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your letter received on the 07 March 2022, concerning the scoping for Knocknamona Windfarm Grid Connection, 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. Waterford was carried out in 2011. The full report details can be found at <a href="here">here</a>. Our records show that there are no CGSs in the vicinity of the proposed.

#### **Groundwater**

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

Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our <u>Map viewer</u> 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 grid connection.





The Groundwater Vulnerability map indicates 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 EIAR to assess potential impacts to groundwater.

The Groundwater Protection Response overview and link to the main report is here: https://www.gsi.ie/enie/publications/Pages/Waterford-Groundwater-Protection-Scheme-Reports.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.

#### 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.

Landslides are common in areas of peat, rock near surface and in fine to coarse range materials (such as glacial tills), areas which are found within the proposed area. 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 <a href="Map Viewer">Map Viewer</a>. 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 <u>Minerals section</u> of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our <u>Map Viewer</u>.

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area of the wind farm grid connection. 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 wind farm grid connection 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 <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx</a>.

#### **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 the Geological Mapping Unit, at <a href="mailto:GeologicalMappingInfo@gsi.ie">mailto:GeologicalMappingInfo@gsi.ie</a>, 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 <a href="mailto:GSIPlanning@gsi.ie">GSIPlanning@gsi.ie</a>.

Yours sincerely,

Clare Glanville

Senior Geologist

Clarefulls

**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 / Limitations	Link to Geological Survey Ireland map viewer
				Associated guidance documentation relating to the National Landslide	
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index/html?id=b68cf1e4a9044a5981f950e9b9c5625c
				Provide information of historic flooding, both surface water and	• 6
				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	
Geohazards	Groundwater Flooding (Historic)	Water	Regional	future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f8_c85_99436b808652f9c735b1cc
				Provides information on the probability of future karst groundwater	
				flooding (where available). [The maps do not, and are not intended to,	9-
				constitute advice. Professional or specialist advice should be sought	
				before taking, or refraining from, any action on the basis of the flood	
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436bt 086f 2f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
				All geological heritage sites identified by Geological Survey Ireland are	
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Pl	al Land & Soils/Landscape	Regional	categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228
-					
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
acological Mapping	Quaternary geology, ocomorphology	Lond & Sons	rational	1.50,000 3carc	maps, feetinings diegs, conjuggs, wedgesterrindex.nam.ne-de/ozeassatz-adeas zode/eezzonodastatut-o
				Broad-scale physical landscape units mapped at 1:100,000 scale in order	
Geological Mapping	Physiographic units:	Land & Soils	National	to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420fc54877843aca1bc075c62b
acological Mapping	Thysographic ands.	Lond & Sons	rational	to be represented as a cartograpme digital map at 1.250,000 scale	megay faceti iningali ega-cony appa wedappiewery indexintini. id-dia/ da/Edres-id/ / observation/
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=9768f4818b79416093b6b2212a850ce6&scale=0
Geological Wapping	Geoorban. Spatial geological data for the greater bubin and cork areas	Land & John	regional	Digitised geotechnical and Site Investigation Reports and boreholes which	intps://dcem.maps.arcgis.com/apps/webappviewer/maex.ntm:/d=5700/401007541005500022128050ce0d3care=0
Geological Mapping	Geotechnical database	Land & Soils	National	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.dccae.gov.ie/goldmine/index.html
Goldillile	Historical data sets including geological memons and 6 to 1 mile geological mapping records	iailu & solis/ Water	INALIONAL	available offilite	intps://secure.accae.gov.ie/golunime/index.intmi
Groundwater & Geothermal	Consideration of the state of t	Water	National	Date limited to 1:100 000 and a site of the site of th	https://documents.com/outs/subspirites/finder.html/2id-7-0-2022045045045045045045045
Groundwater & Geotherman	Groundwater resources (aquifers)	water	INALIUITAI	Data limited to 1:100,000 scale; sites should be investigated at local scale  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	Groundwater recharge.	Water	National	long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Groundwater recharge.	water	INALIONAL	long term annual average recharge	Inters.//ucem.maps.arcgis.com/apps/webappviewer/index.ntmi:ru=/eaaz02501594067a014029a100740ei
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/webappyiewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Groundwater vulnerability.	water	INALIONAL	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for	Incuss// dcelli.inaps.arcgis.com/apps/webappylewer/index.ntml:id=7e8az02501354087a014025a100748e1
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Group scrieme and public supply source protection areas.	water	National	Data is limited to scale of 1:40,000. Data does not include all of the source	https://dcenr.maps.arcgis.com/apps/webappviewer/index.ntml?id=7e8a2023015940874014629410b748ef
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	protections areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal		Water	National	protections areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geottlefffal	Catchinent and Wi D management units.	water	ivaciUlidi	For areas underlain by limestone, includes karst features, tracer test	mcps.//ocem.maps.aregis.com/apps/webappviewei/index.numinu=/eoazozoo135400/ab14029d100/48e1
Groundwater & Geothermal	karst specific data layers	water	National	database; turlough water levels (gwlevel.ie).	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal		Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	wens and optings	water	ivaciOffdl	Not comprehensive, there may be unrecorded wells and springs	mttps://ucem.maps.arcgis.com/apps/webappviewer/index.ntmi:rid=7e8az0z301554087ab14b29a10b748eF
		I		Not autoustive only those in designated SACs, sould be	https://www.gsi.jo/op.jo/orggrammos.and.projects/groundwater.and.goothormal.unit/activities/ved-activities
C	Country to the de Donnelstine		Madagal	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-
Groundwater & Geothermal	Groundwater body Descriptions	Water	National		ireland-groundwater/Pages/Groundwater-bodies.aspx
Groundwater & Geothermal	Geothermal Suitability maps	land & Soils/Water	National	Also, Roadmap for a Policy and Regulatory Framework for Geothermal	http://de-commons.com/com/com/com/com/com/com/com/com/com/
				Energy, November 2020	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a991d60c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland'		National		https://secure.dccae.gov.ie/GSI/INFOMAR_VIEWER/ http://www.cherishproject.eu/en/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Head	ia water	Regional	Compatibility and the section of the	
Marriage O. Constall Unit	Constal Vision and Utaria de COVIII		Desired	Currently the project is being carried out on the east coast and will be	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water /Land & Soils	Regional	rolled out nationally	<u>Index.aspx</u>
		I		Consideration of mineral resources and potential resources as a material	
l.,				asset which should be explicitly recognised within the environmental	//
Minerals	Aggregate potential	Land & Soils/Material Assets	National	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
1		1			L
L., .				Inventory and Risk Classification 2009. Environmental Protection Agency,	https://gis.epa.ie/EPAMaps/default?easting=?&northing=?&lid=EPA:LEMA_Facilties_Extractive_Facilities
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Economic Minerals Division and Geological Survey Ireland (DECC).	https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707ff72f754
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=6304e122b733498b99642707ff72f754
Tellus	urban geochemistry mapping (Dublin SURGE project),	Land & Soils	Regional		https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707ff72f754

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

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