



## **APPENDIX 2-2**

### ***SCOPING RESPONSES***

## Niamh McHugh

---

**From:** Tina Aughney <tinaa@batconservationireland.org>  
**Sent:** Wednesday 9 November 2022 11:37  
**To:** Niamh McHugh  
**Cc:** Órla Murphy  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi Niamh,  
BCIreland is a small wildlife charity and do not have the admin capacity to review planning documents.  
Please ensure that all bat surveys are completed according to survey guidance.  
Regards,  
Bat Conservation Ireland

---

**From:** Niamh McHugh <n timer@mkofireland.ie>  
**Sent:** Wednesday 9 November 2022 11:32  
**To:** Tina Aughney <tinaa@batconservationireland.org>  
**Cc:** Órla Murphy <omurphy@mkofireland.ie>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Dr. Aughney,

I am just catching up on whether you had had a chance to review the below and the attached documents as issued on 22<sup>nd</sup> July this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkofireland.ie](http://mkofireland.ie) | +353 (0)91 735 611



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---

**From:** Niamh McHugh  
**Sent:** Friday 22 July 2022 15:48



To: [tinaa@batconservationireland.org](mailto:tinaa@batconservationireland.org)

Subject: 211107 - Orsted Kilgarvan Wind Farm Repowering

Dr. Aughney,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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## Niamh McHugh

---

**From:** CorporateServices <CorporateServices@CorkCoCo.ie>  
**Sent:** Wednesday 9 November 2022 12:55  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering FAO Heritage Dept

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

Hi Niamh,

Many thanks for your email.

Your correspondence has been sent to the relevant department who will respond in due course.

Kind regards,

Deirdre

**Stiúrthóireacht na Seirbhísí Corparáideacha,  
Urlár 14,  
Halla an Chontae,  
Corcaigh**

**Corporate Services Directorate,  
Floor 14,  
County Hall,  
Cork**

---

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>  
**Sent:** Wednesday 9 November 2022 11:36  
**To:** CustomerCare <CustomerCare@CorkCoCo.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering FAO Heritage Dept

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

Sir/ Madam,

I am just catching up on whether you had had a chance to review the below and the attached documents as issued on 22<sup>nd</sup> July this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcome.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

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**From:** Niamh McHugh  
**Sent:** Friday 22 July 2022 15:56  
**To:** [customercare@corkcoco.ie](mailto:customercare@corkcoco.ie)  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering FAO Heritage Dept

Sir/Madam,

**Informal Scoping Request:**

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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## Niamh McHugh

**From:** James Dwyer <James.Dwyer@CorkCoCo.ie>  
**Sent:** Thursday 4 August 2022 16:10  
**To:** Niamh McHugh  
**Cc:** Michael Lynch (Planning); Ted O'Leary (Inniscarra)  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

You don't often get email from james.dwyer@corkcoco.ie. [Learn why this is important](#)

Niamh,

In this instance it appears that the developer can access this site through the existing wind farms roads to the north. Cork County Council insist that access to the proposed development for all traffic – construction or otherwise - shall be through the existing windfarm roads to the north directly accessed from the N22 at entrance near Loo Bridge. Access to all project related traffic should be prohibited through Coolea or the Top of Coom.

Regards

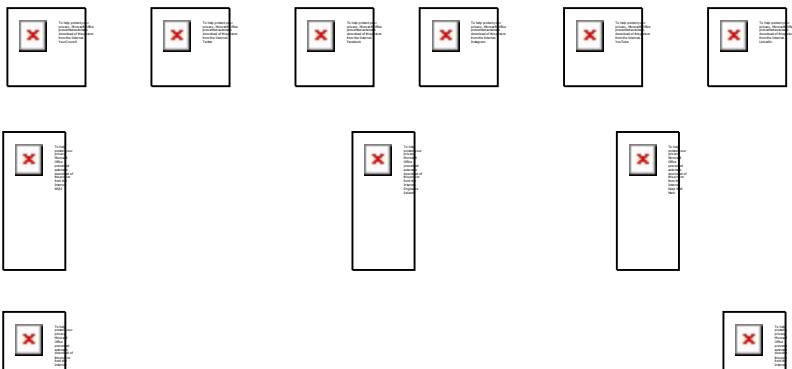
**Séamus O'Dhuibhir** | Innealtóir Feidhmiúcháin Sinsearach | **Bóithre agus Iompar**  
Comhairle Contae Chorcaí | Halla an Bhaile | Maigh Chromtha | Co. Chorcaí | P12 YX48 | Éire  
F +353-(0)26 – 41047  
[james.dwyer@corkcoco.ie](mailto:james.dwyer@corkcoco.ie) | [www.corkcoco.ie](http://www.corkcoco.ie)  
Tairseach na gcustaiméirí: [www.yourcouncil.ie](http://www.yourcouncil.ie)

**James Dwyer** | Senior Executive Engineer | **Roads & Transportation**  
Cork County Council | Town Hall | Macroom | Co Cork | P12 YX48 | Ireland  
T +353-(0)26 – 41047  
[james.dwyer@corkcoco.ie](mailto:james.dwyer@corkcoco.ie) | [www.corkcoco.ie](http://www.corkcoco.ie)  
Customer Portal: [www.yourcouncil.ie](http://www.yourcouncil.ie)



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

[www.corkcoco.ie](http://www.corkcoco.ie)



Ms Niamh McHugh  
MKO  
Tuam Road  
Galway  
Ireland  
H91 VW84

29/07/2022

**Re: Scoping Request for the proposed Wind Farm at Kilgarvan Co. Kerry**

Dear Sir/Madam,

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

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

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

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

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

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

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed.

Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: [gov.ie - Felling Licence Applications \(www.gov.ie\)](http://gov.ie - Felling Licence Applications (www.gov.ie))
3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at:  
[gov.ie - Felling Licence Decisions \(www.gov.ie\)](http://gov.ie - Felling Licence Decisions (www.gov.ie))

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
  - b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
  - c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;
- and
2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees,

deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species.

Yours sincerely,

---

Catherine Boyce  
Felling Section  
Department of Agriculture, Food and the Marine  
Johnstown Castle  
Co Wexford

## Niamh McHugh

---

**From:** Defence Property Management Planning  
<PropertyManagementPlanning@defence.ie>  
**Sent:** Tuesday 9 August 2022 12:32  
**To:** Niamh McHugh  
**Cc:** Gareth O'Flaherty (Defence); Sarah Zacharia (Defence)  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering  
**Attachments:** Kilgarvan Wind Farm Repowering - Scoping Document - F Reduced - 2022.07.21 - 211107.pdf; 211107 - Dept of Defence Scoping Letter - 2022.07.22.pdf

Dear Ms. McHugh,

I refer to your e-mail below, dated 22 July 2022, in relation to the proposed Orsted Windfarm development, located 5.5km northeast of the village of Kilgarvan, Co. Kerry.

I wish to advise at the outset that any determination in relation to a planning consent is solely a matter for the planning authorities and/or ABP, as appropriate. Therefore, the following observations are made on a non-prejudicial basis, and are not intended to be used to rely on for a prospective planning application, nor are these observations to be relied on in the event of any commercial transaction pertaining to such lands and they are not to be relied on in the event of any contract exchange pertaining to same.

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

Single turbines, structures, or turbines delineating the windfarm should be illuminated by Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candela to be visible in all directions of azimuth and to be operational H24/7 days a week. Obstacle lighting should be incandescent or of a type visible to Night Vision equipment. Obstacle lighting must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.

Nothing in the above observations shall be taken as a binding response by the Minister for Defence in the event that a planning application is made. The Minister reserves the right to comment on an actual planning application as and when it is submitted in accordance with the provisions of the planning regulatory code.

We would appreciate if you could keep us informed on any progress relating to this proposed development, in particular if this development was to progress to the pre-planning stage.

Please contact me if you have any queries in this regard.

Best regards  
Don

**Don Watchorn**

*Property Management Branch*

**An Roinn Cosanta**

*Department of Defence*

**Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.**



Station Road, Newbridge, Co.Kildare, W12 AD93.

T +353 (0)45 452199

E-mail [don.watchorn@defence.ie](mailto:don.watchorn@defence.ie)

---

**From:** Niamh McHugh <nhamchugh@mkoireland.ie>

**Sent:** Friday 22 July 2022 16:04

**To:** Defence Property Management Planning <PropertyManagementPlanning@defence.ie>; Sarah Zacharia (Defence) <Sarah.Zacharia@defence.ie>; Gareth O'Flaherty (Defence) <Gareth.OFlaherty@defence.ie>

**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

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Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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Fógra faoi Rúndacht: Tá an ríomhphost seo agus aon iatán a ghabhann

## Niamh McHugh

---

**From:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Sent:** Wednesday 12 October 2022 12:32  
**To:** Niamh McHugh  
**Subject:** RE: G Pre00192/2022 RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

Hi Niamh

Thanks for your below email which I have forwarded to the National Parks and Wildlife Service to check if they have any observations/recommendations for issue.

I can advise that neither our terrestrial or underwater archaeological staff have any observations/recommendations to issue at this time but no inference should be taken from this as they have observations/recommendations to make at a later stage in the process.

Kind Regards  
Sinéad

—  
**Sinéad O' Brien**  
Executive Officer

—  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90**  
Newtown Road, Wexford, County Wexford Y35 AP90  
—

---

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>  
**Sent:** Wednesday 12 October 2022 12:14  
**To:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** FW: G Pre00192/2022 RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

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Hi Sinead,

I'm just catching up on the below. Have you had a chance to examine the Scoping Document for the proposed Repowering of the Existing Kilgarvan Wind Farm as per the email I sent on the 22<sup>nd</sup> July 2022?

I have re-attached the same documents to this email for your convenience.

We would appreciate any feedback you may have.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
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**From:** Housing Manager DAU <[Manager.DAU@housing.gov.ie](mailto:Manager.DAU@housing.gov.ie)>  
**Sent:** Monday 25 July 2022 12:03  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Subject:** Ref: G Pre00192/2022 RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Our Ref: G Pre00192/2022 (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](mailto:manager.dau@housing.gov.ie).

Regards  
Sinéad

—  
**Sinéad O' Brien**  
Executive Officer

—  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90**  
Newtown Road, Wexford, County Wexford Y35 AP90  
—

## Niamh McHugh

---

**From:** GCU - Central Policy Co-Ordination and Reform Divisional Mailbox <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Sent:** Thursday 4 August 2022 10:37  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Good morning Niamh,

Thank you for bringing this notification to the attention of the Department of Transport.

The department has no observations to make at this point in time.

It would be appreciated if you could bring any further updates in relation to this project to the department's attention.

Kind regards  
Jacqui

**Jacqui Traynor**  
*Central Policy, Coordination and Reform*  
**An Roinn Iompair**  
*Department of Transport*

Lána Líosain, Baile Átha Cliath, D02 TR60  
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177  
[gcu@transport.gov.ie](mailto:gcu@transport.gov.ie) [www.gov.ie/transport](http://www.gov.ie/transport)

---

**From:** Niamh McHugh <nhamchugh@mkoireland.ie>  
**Sent:** Friday 22 July 2022 16:05  
**To:** GCU - Reform Communications and Emergency Planning Divisional Mailbox <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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## Niamh McHugh

---

**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Friday 29 July 2022 08:25  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering  
**Attachments:** Fáilte Ireland EIAR Guidelines.pdf

Hello Niamh,

Thank you for your email and EIA Scoping document regarding the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry.

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

Regards,

Yvonne

**Yvonne Jackson**

Product Development-Environment & Planning Support | Fáilte Ireland

88-95 Amiens Street, Dublin 1, D01 WR86

M +353 (0)86 0357590



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



---

**From:** Niamh McHugh <n timer>nhmchugh@mkoireland.ie>  
**Sent:** Friday 22 July 2022 16:08  
**To:** planning applications <planning.applications@failteireland.ie>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

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Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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**Fáilte Ireland**  
National Tourism Development Authority

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



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

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

Phone 1890 525 525  
or +353 1 884 7700  
Email [info@failteireland.ie](mailto:info@failteireland.ie)  
[www.failteireland.ie](http://www.failteireland.ie)



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## 1. Introduction

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

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

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

## 2. Background to this Document

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

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

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

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

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

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

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

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

### **3. Legislation and Statutory Guidance**

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

#### ***Legislation***

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

#### ***Statutory Guidance***

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

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

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

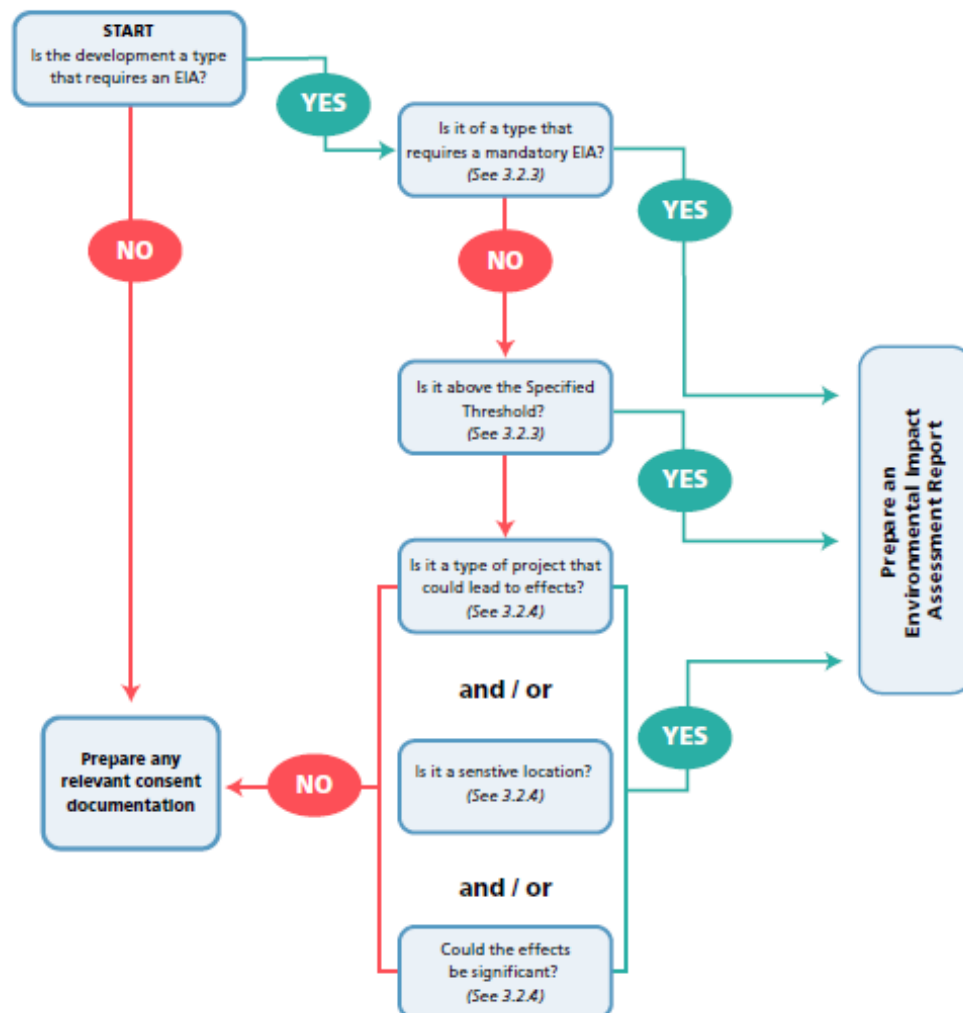
#### ***Screening***

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

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

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

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

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

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

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

## *EIAR Scoping*

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

### **4. Assessing Tourism**

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

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

#### ***Projects which involve a tourism element***

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

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

#### ***Projects which may have an impact upon tourism***

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

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

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

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

## **5. Guiding Principles of EIAR**

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

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

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

## **6. Consideration of Competency and Qualifications**

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

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

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

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

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

## **7. EIAR Requirements**

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

- project description;
- assessment of alternatives considered;

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

### ***Project Description***

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

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

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

### ***Assessment of Alternatives***

The assessment of alternatives is a requirement of EIAR

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

### ***Baseline Assessment***

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

For example, in a tourism context;

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

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

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

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

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

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

### ***Impact Assessment***

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

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

#### **Population and Human Health**

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

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

#### **Biodiversity**

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

#### **Land, Soils and Geology**

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



### Water

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

### Air Quality and Climate

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

### Noise and Vibration

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

### Material Assets; Traffic and Transport

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

### Cultural Heritage

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

### Archaeology

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

### Material Assets; Waste Management

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

### Material Assets

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

### Landscape

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

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

### ***Major Accident and Natural Disaster***

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

### ***Interaction of Effects***

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

### ***Mitigation***

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

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

*Reduce* the exposure of sensitive resources to excessive environmental impact

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

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

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

### ***Cumulative Impact***

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

### ***Transboundary Impact***

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

## **8. Sources of information on Tourism**

### ***Information available online***

#### ***Fáilte Ireland***

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

### *Tourism Ireland*

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

### *Local Authorities*

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

### *Regional Authorities*

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

### *Central Statistics Office*

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

## Niamh McHugh

---

**From:** GSI Planning <GSIPlanning@GSI.ie>  
**Sent:** Wednesday 7 September 2022 09:08  
**To:** Niamh McHugh  
**Cc:** Clare Glanville; GSI Planning  
**Subject:** RE: EIS 22/233 - Orsted Kilgarvan Wind Farm Repowering, Co Kerry  
**Attachments:** 22\_323 Orsted Kilgarvan Wind Farm Repowering Co Kerry.pdf; GSI datasets relevant to EIA & SEA\_20210421.pdf

Dear Niamh,

With reference to your email received on the 22 July 2022, concerning the EIA Scoping Document for the Proposed Repowering of the existing Kilgarvan Wind Farm, Kilgarvan Co. Kerry, please find attached response and dataset sheet from Geological Survey Ireland.

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

Yours sincerely,

Trish Smullen  
Geological Survey Ireland

---

**From:** John Butler <John.Butler@gsi.ie>  
**Sent:** Friday 22 July 2022 16:17  
**To:** Clare Glanville <Clare.Glanville@decc.gov.ie>; Sophie O'Connor <Sophie.OConnor@decc.gov.ie>; Brian McConnell <Brian.McConnell@gsi.ie>; Monica Lee <Monica.Lee@gsi.ie>; Taly Hunter Williams <Taly.HunterWilliams@gsi.ie>; Sean Cullen [Sean.Cullen@gsi.ie](mailto:Sean.Cullen@gsi.ie); Charise McKeon [Charise.McKeon@gsi.ie](mailto:Charise.McKeon@gsi.ie); Jim Hodgson [jim.hodgson@gsi.ie](mailto:jim.hodgson@gsi.ie); Eoin McGrath [Eoin.McGrath@gsi.ie](mailto:Eoin.McGrath@gsi.ie); Trish Smullen [Trish.Smullen@gsi.ie](mailto:Trish.Smullen@gsi.ie)  
**Cc:** GSI Planning [GSIPlanning@GSI.ie](mailto:GSIPlanning@GSI.ie)  
**Subject:** EIS 22/233 - Orsted Kilgarvan Wind Farm Repowering, Co Kerry

[EIS 22/233](#)

Orsted Kilgarvan Wind Farm Repowering, Co Kerry. Request for observations by MKO Ireland. Letter and Scoping Document are enclosed.

Regards,

John

---

**From:** Niamh McHugh [<mailto:nhmchugh@mkofireland.ie>]  
**Sent:** 22 July 2022 16:11  
**To:** John Butler  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

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Hi John,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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



Niamh McHugh  
MKO  
Tuam Road  
Galway

07 September 2022

**Re: EIA Scoping Document for the Proposed Repowering of the existing Kilgarvan Wind Farm, Kilgarvan Co. Kerry**  
**Your Ref: 211107**  
**Our Ref:22/323**

Dear Niamh,

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

With reference to your email received on the 22 July 2022, concerning the EIA Scoping Document for the Proposed Repowering of the existing Kilgarvan Wind Farm, Kilgarvan Co. Kerry, 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 CGSs for County Kerry remain unaudited and as such there is limited detailed information on each site available publicly. The sites are listed in a master list of unaudited sites and are presented on Geological Survey Ireland's Map Viewer as sites with buffer zones but no specific site boundary. **Our records show that there are no unaudited CGSs in the vicinity of the existing wind farm site boundary.**

### **Groundwater**

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

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

**The Groundwater Data Viewer indicates an aquifer classed as a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' underlies the existing wind farm site boundary.**



**The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas.**

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

Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. **The Kerry Groundwater Protection Response overview and link to the main reports is here:** <https://www.gsi.ie/en-ie/publications/Pages/Kerry-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 existing wind farm site boundary. **The Landslide Susceptibility Viewer indicates numerous areas of Moderately Low Susceptibility and some High Susceptibility within the existing wind farm site boundary.**

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

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

### **Natural Resources (Minerals/Aggregates)**

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

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

### **Guidelines**

The following guidelines may also be of assistance:

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



### **Other Comments**

Should development go ahead, all other factors considered, Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to Geological Survey Ireland's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to the Geological Mapping Unit, at <mailto:GeologicalMappingInfo@gsi.ie>, 01-678 2795.

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

Yours sincerely,

Dr. Clare Glanville  
**Senior Geologist**  
**Geological Survey Ireland**

Trish Smullen  
**Geoheritage and Planning Programme**  
**Geological Survey Ireland**

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



**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
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c</a>
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Radon Map	Land & Soils/Air	National		<a href="http://www.epa.ie/radiation/radonmap/">http://www.epa.ie/radiation/radonmap/</a>
Geohazards	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228</a>
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&amp;scale=0</a>
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a20fc54877843aca1bc075c62b</a>
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c16093beb2212a850ce6&amp;scale=0</a>
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c</a>
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	<a href="https://secure.dcaa.gov.ie/goldmine/index.html">https://secure.dcaa.gov.ie/goldmine/index.html</a>
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/rough water levels (gwlevel.ie)	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx</a>
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a9916dc0b9e">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a9916dc0b9e</a>
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		<a href="https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/">https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/</a>
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		<a href="http://www.cherishproject.eu/en/">http://www.cherishproject.eu/en/</a>
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx</a>
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Active quarries	Land & Soils	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	<a href="https://gis.epa.ie/EPAMaps/default?teasing=7&amp;nothing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities">https://gis.epa.ie/EPAMaps/default?teasing=7&amp;nothing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities</a>
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>

**Notes:**

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

## HSE EIA Scoping

### Environmental Health Service Submission Report

**Date:** 5 August 2022

**Our reference:** EHIS 2530

**Report to:** Niamh McHugh, MKO, Tuam Road, Galway, Ireland H91 VW84

**Type of Consultation:** EIA Scoping

**Proposed development:** Kilgarvan Windfarm

**Applicant:** Ørsted Onshore Ireland Midco Ltd

**Proposed Development:** Ørsted Onshore Ireland Midco Ltd is investigating the potential to repower the existing Kilgarvan Wind Farm at Inchee and Lettercannon, Kilgarvan Co. Kerry.

The Proposed Development will likely comprise up to 15 no. wind turbines to replace the 28 no. existing turbines at the site. The existing site roads and hardstanding areas will be utilised where possible with some road upgrade works. Borrow pit(s), internal electrical cabling, temporary construction compound(s), a met mast and some additional hardstanding areas will be constructed. Some felling may be required to facilitate the construction of the proposed turbines and associated infrastructure. Some new sections of site road will also be required which will facilitate the delivery of larger turbine components. The grid connection infrastructure is already in place and will be utilised by the proposed new turbines.

### General Introduction

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

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

[https://www.housing.gov.ie/sites/default/files/publications/files/guidelines\\_for\\_planning\\_authorities\\_and\\_an\\_bord\\_pleanála\\_on\\_carrying\\_out\\_eia\\_-\\_august\\_2018.pdf](https://www.housing.gov.ie/sites/default/files/publications/files/guidelines_for_planning_authorities_and_an_bord_pleanála_on_carrying_out_eia_-_august_2018.pdf)

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

[http://ec.europa.eu/environment/eia/pdf/EIA\\_guidance\\_EIA\\_report\\_final.pdf](http://ec.europa.eu/environment/eia/pdf/EIA_guidance_EIA_report_final.pdf)

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

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

The applicant should also consider the findings of the High Court judgement issued in the judicial review of the Derryadd Wind Farm. (2021 IEHC 390 [20202 No. 557 JR] P. Sweetman v An Bord Pleanála)

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

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

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

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

The HSE will consider the final EIAR accompanying the SID/Planning application and will make comments to An Bord Pleanála/Local Planning Authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 22<sup>nd</sup> July 2022

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

- Public Consultation
- Decommissioning phase of both the existing and proposed windfarms
- Siting and location of turbines
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality

- Geological Impacts
- Ancillary facilities
- Cumulative impacts

## **Public Consultation**

Although a wind farm has been in existence on this site for a number of years, it is strongly recommend that early and meaningful public consultation with the local community should be carried out to ensure all potentially significant impacts have been adequately addressed.

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

The EIAR should demonstrate that consent has been sought and received from all interested parties, particularly in respect of lands which may be shared. (commonage)

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

With the lifting of restrictions around public gatherings as a result of Covid 19 prevention measures there should be no barrier to holding public consultation events. The Environmental Health Service expects that meaningful public consultation, where the local community is fully informed of the proposed development, will be undertaken. Members of the public should be given sufficient opportunities to express their views on the proposal wind farm development.

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

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

The EIAR should state the period of planning permission sought, the length of time construction is estimated to take and if it is anticipated that the re-powered wind farm will be decommissioned and removed or will continue to operate (following any further planning consent) at the end of this period of planning permission (should permission be granted)

## **Decommissioning Of Existing Windfarm**

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

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

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

### **Siting, Location and details of Turbines**

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

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

Details of the foundations for the wind turbine including depth, quantity and material to be used should be included in the EIAR.

### **Assessment of Consideration of Alternatives**

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

### **Noise & Vibration**

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

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

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

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

[https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft\\_revised\\_wind\\_energy\\_development\\_guidelines\\_december\\_2019.pdf](https://www.housing.gov.ie/sites/default/files/public-consultation/files/draft_revised_wind_energy_development_guidelines_december_2019.pdf).

### **Shadow Flicker**

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

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

### **Air Quality**

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

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

### **Surface and Ground Water Quality**

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

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

Any impacts on surface water as a result of the construction of the underground cables should be identified and addressed in the EIAR.

### **Geotechnical and Peat Stability Assessment**

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

Information should be provided on the make and model of the turbines and on construction details for the turbine foundations, including the depth and volume of concrete required. An accurate assessment of the potential impacts of the foundations on water quality and peat stability cannot be undertaken without this information.

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

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

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

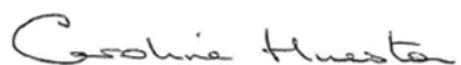
### **Ancillary Facilities**

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

### **Cumulative Impacts**

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

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



Environmental Health Officer  
Environment NSU  
Ennistymon Health Centre  
Ennistymon  
Co. Clare

Niall Roche  
Environmental Health Officer  
Environment NSU  
Yard 4, Promenade Road,  
Dublin Port, Dublin 3, D03 R9X3



## Niamh McHugh

---

**From:** Catherine Kerins <Catherine.Kerins@fisheriesireland.ie>  
**Sent:** Wednesday 27 July 2022 09:34  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello Niamh

I cover the Upper Shannon only, as previously advised please check which area you require on our website before sending and send it to the relevant office to avoid delays in responding and additional administration time. This area is covered by IFI, Macroom.

Regards

Catherine Kerins  
Senior Fisheries Environmental Officer  
Inland Fisheries Ireland - Drumsna

-----  
**Iascach Intíre Éireann**  
**Inland Fisheries Ireland**

Tel +353 (0)7196 24218  
Mob +353 (0) 87 2860942

Email [Catherine.kerins@fisheriesireland.ie](mailto:Catherine.kerins@fisheriesireland.ie)

Web [www.fisheriesireland.ie](http://www.fisheriesireland.ie)

Belmont, Drumsna, Carrick on Shannon, Co. Leitrim, N41 HD78, Ireland.  
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**Help Protect Ireland's Inland Fisheries**

**Call 0818 34 74 24 to report illegal fishing, water pollution or invasive species.**

---

**From:** Niamh McHugh <nhamchugh@mkoireland.ie>  
**Sent:** Friday 22 July 2022 16:13  
**To:** Catherine Kerins <Catherine.Kerins@fisheriesireland.ie>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

**\*\*\*CYBER SECURITY WARNING\*\*\*:** This email originated from outside of Inland Fisheries Ireland email system and contains an attachment(s). Do not open attachments from unknown sources.

Ms. Kerins,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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## Niamh McHugh

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**From:** Karen Griffin <Karen.Griffin@fisheriesireland.ie>  
**Sent:** Wednesday 14 September 2022 13:09  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

You don't often get email from karen.griffin@fisheriesireland.ie. [Learn why this is important](#)

Dear N. McHugh,

Thank you for your correspondence.

The proposed development is within the ROUGHTY\_030 catchment. The receiving waters are the Thureehouma stream and other unnamed tributaries of the Roughty river. All significant Salmonid fisheries, with the Roughty being of high status under the WFD.

In this context IFI would require high water quality to be maintained with no interference to the fisheries habitat, IFI ask that the following requirements should be taken into consideration.

There should be no drainage, crossing, bridging, culverting or other physical interference with the bed or bank of any watercourse, even those not on the OSi, without prior consultation with IFI.

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

1. Identifying and zoning the project for environmental impact should a peat slip occur.
2. Setting out contingency plan should a peat movement occur.
3. Setting out a plan for the control of silt in such a scenario, including measures to be put in place at the initial stages of construction.
3. Adequate mitigation measures in place to prevent siltation of any surface water.

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

1. The free passage of fish must not be obstructed.
2. Span watercourse crossings are the preferred option
3. Design details on any proposed crossing should be forwarded to IFI for consideration and incorporated at planning stage

4. Instream works should be carried out only in the July-September period.

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

Regards  
Karen Griffin

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Thursday 28 July 2022 11:07  
**To:** Macroom Info <[Macroom@fisheriesireland.ie](mailto:Macroom@fisheriesireland.ie)>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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## Niamh McHugh

---

**From:** IWT Info <info@iwt.ie>  
**Sent:** Wednesday 3 August 2022 16:56  
**To:** Niamh McHugh  
**Subject:** Re: 211107 - Orsted Kilgarvan Wind Farm Repowering

Dear Niamh,  
Apologies for the late reply.

Thank you for contacting us. We do not have the staff capacity to respond to this consultation at the moment but we will endeavour to respond if possible.

Kind regards,  
Fabiola Vieira

On Fri, 22 Jul 2022 at 16:18, Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)> wrote:

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

## Niamh McHugh

---

**From:** IWT Info <info@iwt.ie>  
**Sent:** Wednesday 9 November 2022 12:10  
**To:** Niamh McHugh  
**Subject:** Re: FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi Niamh,  
Unfortunately we do not have the staff capacity to respond to this consultation at the moment.

Kind regards,  
Fabiola Vieira

On Wed, 9 Nov 2022 at 11:53, Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)> wrote:

Hi Fabiola,

I am just catching up on whether you had had a chance to review the below and the attached documents as issued on 22<sup>nd</sup> July this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,

Niamh

**Niamh McHugh BSc. (Env)**

Environmental Scientist

---

## Niamh McHugh

---

**From:** Cathy Fisher <cathy.fisher@kerrycoco.ie>  
**Sent:** Friday 11 November 2022 15:43  
**To:** Niamh McHugh  
**Cc:** Stuart Roche  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

You don't often get email from cathy.fisher@kerrycoco.ie. [Learn why this is important](#)

Hello Niamh

Further to the email below from Stuart Roche, I would also add the following:

I have reviewed the information and location and note the information provided and make the following comments:

- I note the applicant is to submit an EIAR and AA Screening Report, and if required a NIS,
- Regarding likely significant effects on European sites, I note the application is outside of European Sites but is upstream/in proximity to European sites including those designated for birds of SCI,
- As the applicant is no doubt aware, any measures intended to avoid or reduce harmful effects on European sites should not be included at screening stage,
- The full suite of annexed habitats and species should be assessed for likely impacts (I note similar proposed developments in this area had possible impacts on the Kerry Slug)
- Regarding the EIAR - the applicant should include an ecological impact assessment on terrestrial and aquatic habitats and protected species, if applicable, identified. All supporting survey work should be undertaken to current best practices with competencies of staff outlined. Please consult with IFI and NPWS as applicable,
- Any ornithology surveys should be robust and supported by at least 1 year of winter and breeding survey undertaken to concurrent best practices,
- Likely impacts on White Tailed Sea Eagle should be specifically assessed, advisable to consult with NPWS in relation to same and note mitigation provided in the recently adopted Kerry County Development Plan 2022-2028 for mitigation of any likely impacts on the species.
- The application should include and assess all in-combination/accumulative effects of all elements of the project (grid connection, demolition/decommissioning works etc) and/or other projects in the environs of the proposed development, and

Finally I note:

- The Kerry County Development Plan 2022-2028 outlines specific policy in relation to re-powering. Since the plan was adopted early this year, elements of the plan, specifically those that relate to wind energy, are subject to a Ministerial Direction. The process of this Ministerial Direction is ongoing and can be reviewed at: <https://consult.kerrycoco.ie/en/browse>

Regards  
Cathy

Cathy Fisher  
Environmental Assessment Unit  
County Buildings, Kerry County Council, Rathass, Co Kerry, Eircode V92 NP2C  
E: [cathy.fisher@kerrycoco.ie](mailto:cathy.fisher@kerrycoco.ie) M: 087 1444593

---

**From:** Stuart Roche <[stuart.roche@kerrycoco.ie](mailto:stuart.roche@kerrycoco.ie)>  
**Sent:** Friday 11 November 2022 13:17  
**To:** nhmchugh@mkoireland.ie  
**Cc:** Cathy Fisher <[cathy.fisher@kerrycoco.ie](mailto:cathy.fisher@kerrycoco.ie)>; Michael Boyce <[mboyce@kerrycoco.ie](mailto:mboyce@kerrycoco.ie)>  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi Niamh

Just a quick query about the above scoping document. I see that it is proposed to use existing site roads and hardstanding areas on site, however are the old turbine concrete bases to be re-used or removed or will that be included as part of the environmental management plan for the site. Also is the cabling being removed and replaced?

Baseline surface water quality should be submitted with the EIA as part of the water quality assessments for the proposed development too.

If you have any queries you can contact me at 066 7162000 or email [stuart.roche@kerrycoco.ie](mailto:stuart.roche@kerrycoco.ie)

Thanks

Stuart

Stuart Roche  
Environmental Officer  
Environmental Services  
Kerry County Council  
Maine Street  
Tralee  
Co. Kerry  
Eircode V92 AP2W  
066 7162000  
[Stuart.roche@kerrycoco.ie](mailto:Stuart.roche@kerrycoco.ie)

---

**From:** Michael Boyce <[mboyce@kerrycoco.ie](mailto:mboyce@kerrycoco.ie)>  
**Sent:** 09 November 2022 13:46  
**To:** Stuart Roche <[stuart.roche@kerrycoco.ie](mailto:stuart.roche@kerrycoco.ie)>; Mark O'Sullivan <[mark.osullivan@kerrycoco.ie](mailto:mark.osullivan@kerrycoco.ie)>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi guys,

Could you have a look at the attached and come back to me.

Thanks,

Mick

---

**From:** environ <[environ@kerrycoco.ie](mailto:environ@kerrycoco.ie)>  
**Sent:** Wednesday 9 November 2022 13:07  
**To:** Michael Boyce <[mboyce@kerrycoco.ie](mailto:mboyce@kerrycoco.ie)>; Helen Burke <[HBURKE@kerrycoco.ie](mailto:HBURKE@kerrycoco.ie)>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hello Mick / Helen

Is this for your attention?

Pauline

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Wednesday 9 November 2022 12:04  
**To:** environ <[environ@kerrycoco.ie](mailto:environ@kerrycoco.ie)>



Cc: Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

Subject: FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

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Sir/ Madam,

I am just checking in on whether you had had a chance to review the below and attached information as issued to you on the 22<sup>nd</sup> July this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611



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**From:** Niamh McHugh

**Sent:** Friday 22 July 2022 16:19

**To:** [environ@kerrycoco.ie](mailto:environ@kerrycoco.ie)

**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

**Informal Scoping Request:**

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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*Cé gur féidir liom ríomhphoist a léamh agus a sheoladh lasmuigh de ghnáthuaireanta oibre, nílím ag súil le freagra ná gníomh uaitse lasmuigh de d'uaireanta oibre féin. While I may read and send emails outside normal working hours I do not expect a response or action outside your own working hours.*

## Niamh McHugh

---

**From:** roads <roads@kerrycoco.ie>  
**Sent:** Wednesday 9 November 2022 15:19  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Ms McHugh,

I wish to acknowledge your e-mail and wish to advise that I have forwarded to Kieran O'Halloran, Kenmare Area Engineer, Pádraic Teahan, Kenmare Municipal District Engineer, Fiona O'Neill, Senior Engineer and John Kennelly, A/Director of Services, Roads, Transportation and Marine, for their attention and direct reply.

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

---

**From:** Niamh McHugh <nhamchugh@mkoireland.ie>  
**Sent:** Wednesday 9 November 2022 12:10  
**To:** roads <roads@kerrycoco.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

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

Hi Ann-Marie,

I am just checking in the below, I haven't received a response from the Kenmare Municipal District office. Would you be able to chase this up for me, or pass me on the relevant contact details please?

Thank you.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611



---

**From:** roads <[roads@kerrycoco.ie](mailto:roads@kerrycoco.ie)>  
**Sent:** Friday 22 July 2022 16:39  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Dear Niamh,

I wish to acknowledge receipt of your e-mail and advise that I have forwarded same to the Kenmare Municipal District Engineers for their attention.

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

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Friday 22 July 2022 16:21  
**To:** roads <[roads@kerrycoco.ie](mailto:roads@kerrycoco.ie)>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

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

Sir/Madam,

**Informal Scoping Request:**

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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*Cé gur féidir liom ríomhphoist a léamh agus a sheoladh lasmuigh de ghnáthuaireanta oibre, nílím ag súil le freagra ná gníomh uaitse lasmuigh de d'uaireanta oibre féin. While I may read and send emails outside normal working hours I do not expect a response or action outside your own working hours.*

## Niamh McHugh

---

**From:** Howard Jones <howard.jones@kerryairport.ie>  
**Sent:** Monday 14 November 2022 10:13  
**To:** Niamh McHugh  
**Cc:** Órla Murphy; John Mulhern  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Good morning Niamh,

Based on the information provided the closest point to Kerry Airport is 30Km and the highest ground level is 447M AMSL.

With a maximum mast tip height of 200m this would convert to a maximum tip height of 2133ft AMSL.

If you can confirm that this is correct the development should not impact on the Airports operations.

Regards,

**Howard Jones**  
Chief Operating Officer

email: [howard.jones@kerryairport.ie](mailto:howard.jones@kerryairport.ie)

**KERRY AIRPORT IRELAND**

Farranfore, Killarney, Co. Kerry, Ireland. V93 KH7  
tel: (0)66 976 4644 | fax: (0)66 976 4134 | [www.kerryairport.ie](http://www.kerryairport.ie)

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**RYANAIR** **Aer Lingus** **WILD ATLANTIC WAY**

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Registered in Ireland under Registration Number: 26871

Registered Office: Farranfore, Killarney, Co. Kerry, Ireland. [www.kerryairport.ie](http://www.kerryairport.ie)

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**From:** Niamh McHugh <n timer> n timer> n timer>  
**Sent:** Thursday 10 November 2022 10:08  
**To:** Howard Jones <howard.jones@kerryairport.ie>  
**Cc:** Órla Murphy <omurphy@m timer> m timer>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

---

### EXTERNAL MAIL

This message originated from outside Kerry Airport.

Hi Howard,

In relation to the phone conversation we had earlier this morning, please see the following co-ordinate points relating to the Proposed Repowering of Kilgarvan Wind Farm:

- North-east point: 51.941167651, -9.304647337
- South-east point: 51.927494217, -9.302229612
- Westerly point: 51.931498073, -9.360731950

I can confirm that the proposed turbines would be of a **maximum** 200m tip height above ground. The existing 28 no. turbines on that site will be decommissioned before the proposed turbines are constructed.

Please get back to me if there is any further information you require from us in relation to this development.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

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[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611



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---

**From:** Niamh McHugh  
**Sent:** Wednesday 9 November 2022 12:14  
**To:** [info@kerryairport.ie](mailto:info@kerryairport.ie)  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

I am just catching up on whether you have had a chance to review the attached and below information as issued on 22<sup>nd</sup> July of this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84



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**From:** Niamh McHugh

**Sent:** Friday 22 July 2022 16:24

**To:** [info@kerryairport.ie](mailto:info@kerryairport.ie)

**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)

Graduate Environmental Scientist

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

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## Niamh McHugh

---

**From:** Sustainable Energy Authority of Ireland <info@seai.ie>  
**Sent:** Tuesday 26 July 2022 10:47  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering CRM:06700001262

Dear Niamh,

Thank you for contacting SEAI.

Please direct your email to [office@windenergyireland.com](mailto:office@windenergyireland.com).

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

Yours sincerely,

Andzelika



SEAI is funded by the Government of Ireland through the Department of Communications, Climate Action and Environment.

Tá SEAI maonithe ag Rialtas na hÉireann tríd an Rionn Cumarsáide, Gníomhaithe ar son na hAeráide agus Comhshaoil.

----- Original Message -----

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>;  
**Received:** Fri Jul 22 2022 16:26:33 GMT+0100 (Irish Standard Time)  
**To:** Reception . <info@seai.ie>; Reception <info@seai.ie>;  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

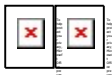
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**\*\* Please note, SEAI Dublin Office has relocated to 3 Park Place, Upper Hatch Street, Dublin 2\*\***



***The Sustainable Energy Authority of Ireland (SEAI) works with the public, businesses, government and communities to achieve a cleaner energy future. SEAI is funded by the Government of Ireland through the Department of the Environment, Climate and Communications.***

In line with current public health guidelines, many SEAI staff are working from home. In these circumstances, while it may suit us to send emails outside of normal business hours, we do not expect a response or action outside your own working hours.

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SEAI  
Tel: +353 (0) 1 8082100  
Web: [www.seai.ie](http://www.seai.ie)



## Niamh McHugh

---

**From:** Tracey Duffy <tduffy@lawaters.ie>  
**Sent:** Wednesday 9 November 2022 14:47  
**To:** Niamh McHugh  
**Cc:** Órla Murphy  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi Niamh,

Thank you for your email and apologies in the delay in getting back to you since the initial email in July. LAWPRO is a Local Authority Shared service and not a statutory body, thus, LAWPRO does not provide comment or make submissions on planning applications.

We would advise you to contact the relevant Local Authority with regards this matter which would be Kerry County Council, particularly their Environment Section.

Kind regards,  
Tracey

**Tracey Duffy | Acting Catchment Manager**  
**SouthWest Region**  
M 085 856 2840

**Local Authority Waters Programme**  
*Clár Uiscí na nÚdarás Áitiúil*  
Croom Community Enterprise Centre  
Croom Enterprise Park  
Hospital Road, Croom  
Co. Limerick V35 WF77

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**From:** Niamh McHugh <nhamchugh@mkoireland.ie>  
**Sent:** 09 November 2022 12:16  
**To:** Tracey Duffy <tduffy@lawaters.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi Tracy,

I am just catching up on whether you have had a chance to review the attached and below information as issued on 22<sup>nd</sup> July of this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

---

**MKO**

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**From:** Niamh McHugh  
**Sent:** Monday 25 July 2022 09:38  
**To:** [tduffy@lawaters.ie](mailto:tduffy@lawaters.ie)  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

Please see the below email which I had sent to your colleague Maeve Ryan. I received an auto reply notifying me that Maeve had since retired, and to forward the email to yourself instead.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
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---

**From:** Niamh McHugh  
**Sent:** Friday 22 July 2022 16:27  
**To:** [mryan@lawaters.ie](mailto:mryan@lawaters.ie)  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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## Niamh McHugh

---

**From:** INFO <Information@tii.ie>  
**Sent:** Tuesday 15 November 2022 16:38  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Dear Ms. McHugh,

Thank you for your email of 9 November 2022 regarding the above. The position in relation to your enquiry is as follows.

A response to the EIAR scoping request was outlined in our previous email of the 29 July 2022. As such, Transport Infrastructure Ireland (TII) has no further comment to make in relation to the EIAR scoping request for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry.

I hope that this information is of assistance to you.

Yours sincerely,

**Alban Mills**  
**Senior Regulatory & Administration Executive**  
**Ref No. TII22-119510**



---

**From:** Niamh McHugh <n timers> nhmchugh@mkoireland.ie>  
**Sent:** Wednesday 9 November 2022 12:33  
**To:** INFO <Information@tii.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Mr. Mills,

I am just catching up on the below. Have you had a chance to review the Scoping Document which we issued to you on the 22<sup>nd</sup> July this year?

If you have any specific comments or recommendations to make, they would be welcomed.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84

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**From:** Niamh McHugh  
**Sent:** Friday 29 July 2022 11:54  
**To:** INFO <[Information@tii.ie](mailto:Information@tii.ie)>  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Mr. Mills,

Many thanks for your correspondence on this matter, I look forward to hearing from you again on this matter.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
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Ireland, H91 VW84  
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---

**From:** INFO <[Information@tii.ie](mailto:Information@tii.ie)>  
**Sent:** Friday 29 July 2022 11:37  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

You don't often get email from [information@tii.ie](mailto:information@tii.ie). [Learn why this is important](#)

TII acknowledges receipt of your consultation correspondence (ref. 211107) and Environmental Impact Assessment Scoping Document by email on 25 July 2022 relating to the above EIAR Scoping exercise.

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

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

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

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

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

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



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

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

Any 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.

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

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

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

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

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

**Yours sincerely,**

**Alban Mills**  
**Senior Regulatory & Administration Executive**  
**Ref No. TII22-119510**



**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Friday 22 July 2022 16:29  
**To:** Landuse Planning <[LandUsePlanning@tii.ie](mailto:LandUsePlanning@tii.ie)>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

You don't often get email from [nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie). [Learn why this is important](#)

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Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkofireland.ie](http://www.mkofireland.ie)



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

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## Niamh McHugh

---

**From:** Matthew Craig <matthew.craig@2rn.ie>  
**Sent:** 27 January 2023 10:29  
**To:** Niamh McHugh  
**Cc:** Órla Murphy; 'windfarms@rte.ie'; Johnny Evans  
**Subject:** RE: 211107 - Telecoms Scoping Exercise  
**Attachments:** 2rn Protocol Agreement 2023 - V1 - 2023.01.19 - 211107 Signed.pdf

Hi Niamh,

Please find attached the signed protocol.  
The information below is great thanks.

Regards

**Matthew Craig**

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

---

**From:** Niamh McHugh <n timer> n timer>  
**Sent:** Thursday 26 January 2023 17:12  
**To:** Matthew Craig <matthew.craig@2rn.ie>  
**Cc:** Órla Murphy <omurphy@m timer> 'windfarms@rte.ie' <windfarms@rte.ie>; Johnny Evans <johnny.evans@2rn.ie>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Matthew,

Please see signed protocol agreement for the Proposed Kilgarvan Wind Farm attached here. Please see below some information about the proposed turbines:

- It is proposed to decommission the existing 28 no. turbines and to replace them with 11 no. turbines of a max tip height of 200m and a max blade length of 82m.
- The turbines are proposed to be located within the townlands of Inchee, Lettercannon and Inchincoosh.

I notice that the KMZ is outside our general site area, do you need anything further from us?

Thanks.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84



Offices in Galway and Dublin

[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611

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**From:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>

**Sent:** 06 January 2023 16:43

**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>

**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>; 'windfarms@rte.ie' <[windfarms@rte.ie](mailto:windfarms@rte.ie)>; Johnny Evans <[johnny.evans@2rn.ie](mailto:johnny.evans@2rn.ie)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

I have attached the Protocol.

The location of the windfarm is sufficient for the protocol.

We would appreciate more information on the location of the site and the number and location of the turbines, just in case there are any problems with the broadcast coverage.

Currently all the information that we have is a circle with a 5km diameter, that two of our off-air paths pass through. You have reassured us that that our off-air paths to our sites at Kilkeaveragh and Castletownbere, outlined in our earlier correspondence, are one kilometre away from any turbines planned at the site.

There is a risk of interference to viewers from Gorthloughera to Derreenamacken receiving from our site at Mullaghanish that we have been unable to assess with the information that has been provided so far. I have attached a kmz file showing the possible extent of the area that depending on the location and size of the turbines.

Regards

**Matthew Craig**

Project Engineer

Projects and Coverage Planning

2RN

Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland  
D24 WK28

Phone: + 353 (0) 1 2082261

Mobile: + 353 (0) 87 7509955

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>

**Sent:** Friday 6 January 2023 10:44

**To:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>

**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>; 'windfarms@rte.ie' <[windfarms@rte.ie](mailto:windfarms@rte.ie)>; Johnny Evans <[johnny.evans@2rn.ie](mailto:johnny.evans@2rn.ie)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Matthew,

I am contacting you in relation to the below project – the Repowering of Kilgarvan Wind Farm, Co. Kerry. You had previously requested that our client sign a Protocol with yourselves once the project was approaching its final stages. Would you be able to send this Protocol document across to me please?

Would you also be able to let me know whether you would require our specific turbine locations to be included within this document, or whether our general study area could be included instead?

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611



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**From:** Niamh McHugh  
**Sent:** 12 October 2022 12:27  
**To:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>; [windfarms@rte.ie](mailto:windfarms@rte.ie); Johnny Evans <[Johnny.Evans@2rn.ie](mailto:Johnny.Evans@2rn.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Matthew,

Thanks for that confirmation. We will revert back to you once the final design detail of the development is available and the protocol can be signed then.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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---

**From:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>  
**Sent:** Wednesday 12 October 2022 12:17  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>; [windfarms@rte.ie](mailto:windfarms@rte.ie); Johnny Evans <[Johnny.Evans@2rn.ie](mailto:Johnny.Evans@2rn.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

The Protocol covers if a turbine causes interference to one of our distribution links between our sites and any disturbance to the path between the sites and the viewers.

We ask that a protocol be signed even if it does not affect our distribution links as it may cause problems to viewers in the area that need to be remedied by the developer either best case by the viewers antenna being redirected to another site by a local installer or worst case where many viewers are affected the construction of a transposer site.

Regards

**Matthew Craig**

Project Engineer  
Projects and Coverage Planning  
2RN

Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland D24 WK28  
Phone: + 353 (0) 1 2082261 Mobile: + 353 (0) 87 7509955

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**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Wednesday 12 October 2022 11:48  
**To:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>; [windfarms@rte.ie](mailto:windfarms@rte.ie); Johnny Evans <[Johnny.Evans@2rn.ie](mailto:Johnny.Evans@2rn.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Matthew,

In relation to the below, I'm just informing you that the at its closest point, this link buffer is roughly 1km from the closest turbine.

Is it necessary in this case for us to sign a protocol with yourselves given the clearance distance achieved? If you require further detail from us on this clearance distance let me know.

Thanks.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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**From:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>  
**Sent:** Thursday 17 February 2022 10:32  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>; [windfarms@rte.ie](mailto:windfarms@rte.ie); Johnny Evans <[Johnny.Evans@2rn.ie](mailto:Johnny.Evans@2rn.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

Two of our off air links pass through the area that you have highlighted in your email.

Site	Lat.	Long.	Site Height AMSL (m)	Ant height AGL (m)	Ant height AMSL (m)	Freq (MHz)
Mullaghanish	51.983387	-9.14431	648	107	755	90
Castletownbere	51.641548	-9.99985	464	15	479	
Mullaghanish	51.983387	-9.14431	648	210	858	474
Castletownbere	51.641548	-9.99985	464	20	484	

Mullaghanish	51.983387	-9.14431	648	107	755	90
Kilkeaveragh	51.868064	-10.3337	364	17	381	
Mullaghanish	51.983387	-9.14431	648	210	858	474
Kilkeaveragh	51.868064	-10.3337	364	17	381	

I have attached a KMZ file with the 2<sup>nd</sup> Fresnel Zone displayed in Red for the VHF frequencies and yellow for the UHF frequencies. If you could let us know when you have more details of the turbines we may be able to reduce the size of the Fresnel zones.

There is also a risk of interference to broadcast services to the south west of the site for our customers receiving from Mullaghanish, we would therefore ask that a protocol be signed between the developer and 2rn should the site go ahead.

**Matthew Craig**

Project Engineer

Projects and Coverage Planning

2RN

Block B, Cookstown Court, Old Belgard Road, Tallaght, Dublin 24, Ireland D24 WK28

Phone: + 353 (0) 1 2082261 Mobile: + 353 (0) 87 7509955

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## Niamh McHugh

---

**From:** Roger Woods <rwoods@bai.ie>  
**Sent:** Wednesday 3 August 2022 11:03  
**To:** Niamh McHugh  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Niamh

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

Regards

Roger

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

Tel: 01 6441200  
Fax: 01 6441299

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Please consider the environment before printing this email

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**From:** Niamh McHugh <nhamchugh@mkoireland.ie>  
**Sent:** Friday 22 July 2022 15:52  
**To:** Roger Woods <rwoods@bai.ie>  
**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Hi Roger,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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## Niamh McHugh

---

**From:** padraig.condon@bt.com  
**Sent:** Tuesday 29 March 2022 10:04  
**To:** Niamh McHugh  
**Cc:** Órla Murphy  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,  
Apologies for the delay. I can confirm the planned development will have no impact on the BT Ireland microwave network.

Regards

**Padraig Condon**  
Core Network Operations

**Tel:** +353014326819  
**Mobile number:** +353 86 604 0636  
**BT Meetme:** + 353 1 6569053  
**E-mail** [padraig.condon@bt.com](mailto:padraig.condon@bt.com)  
<https://www.webjoin.com/>  
**Participant:** 40342233#  
**Web:** [www.btireland.com](http://www.btireland.com)



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---

**From:** Niamh McHugh <n timer> n timer>  
**Sent:** 28 March 2022 15:00  
**To:** Condon,PG,Padraig,NQE32E R <padraig.condon@bt.com>  
**Cc:** Órla Murphy <omurphy@m timer>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

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ring if you had had a chance to review this location?

We are currently compiling a constraints study and would be useful if we could receive this information from you as soon as possible in order to avoid any conflicts.

If there is anything else you need from me in order to carry out your investigation, please get back to me.

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>

**Sent:** Wednesday 16 February 2022 09:58

**To:** [padraig.condon@bt.com](mailto:padraig.condon@bt.com)

**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

**Subject:** 211107 - Telecoms Scoping Exercise

Hi Padraig,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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## Niamh McHugh

---

**From:** Cecilia Kirwan <Cecilia.Kirwan@comreg.ie>  
**Sent:** Friday 18 February 2022 11:24  
**To:** Niamh McHugh  
**Cc:** Sinead French  
**Subject:** RE: [Confidential] 211107 - Telecoms Scoping Exercise, Kilgarvan Windfarm  
**Attachments:** MKO-Kilgarvan, Co Kerry.xlsx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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Hi Niamh,

Please find attached a list of telecoms operators within a 15Km radius of the center point given. I have also included information on broadcasting services.  
I hope this meets your requirement.

Best Regards  
Cecilia Kirwan.

---

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>  
**Sent:** Thursday, February 17, 2022 4:48 PM  
**To:** Cecilia Kirwan <Cecilia.Kirwan@comreg.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: [Confidential] 211107 - Telecoms Scoping Exercise, Kilgarvan Windfarm

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Hi Cecilia,

Thanks for getting back to me. The national Grid reference for the approximate centre of the site is E106487 N106487.

Looking forward to hearing back from you.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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**From:** Cecilia Kirwan <[Cecilia.Kirwan@comreg.ie](mailto:Cecilia.Kirwan@comreg.ie)>  
**Sent:** Thursday 17 February 2022 16:15  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Subject:** [Confidential] 211107 - Telecoms Scoping Exercise, Kilgarvan Windfarm

You don't often get email from [cecilia.kirwan@comreg.ie](mailto:cecilia.kirwan@comreg.ie). [Learn why this is important](#)

Thank you for your query related to a proposed windfarm near Kilgarvan, Co Kerry. Could you send me the Irish Grid Easting/Northing for the center point of the proposed. I will then be able to give you a list of telecoms operators within a 15km of the center point.

Many thanks.

Best regards,

**Cecilia Kirwan**

Radio Spectrum Engineer

An Coimisiún um Rialáil Cumarsáide  
Commission for Communications Regulation

1 Lárcheantar na nDugaí, Sráid na nGildeanna, BÁC 1, Éire, D01 E4X0  
One Dockland Central, Guild Street, Dublin 1, Ireland, D01 E4X0

Tel: +35318049791  
Rphost | Email [cecilia.kirwan@comreg.ie](mailto:cecilia.kirwan@comreg.ie)  
Suíomh | Website [www.comreg.ie](http://www.comreg.ie)

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<https://www.comreg.ie/privacy/>

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Tá an ríomhphost seo, chomh maith le haon iatáin a bhaineann leis faoi rún agus d'fhéadfadh leis a bheith faoi phribhléid nó cosanta ó aon nochtadh. Is don seolaí(aithe) ainmnithe thuas amháin é. Níl sé ceadaithe go mbeidh rochtain ag éinne eile ar an ríomhphost seo. Más rud é nach tusa an faighteoir ainmnithe, ná cló amach, léigh, cóipeáil, nocht d'éinne nó bain úsáid as an eolas sa ríomhphost seo in aon tslí eile, le do thoil. Más rud é go bhfuair tú an ríomhphost seo trí earráid, dean teagmháil leis an seoltóir láithreach agus scríos an t-ábhar ina iomlán, bíodh sé i gcóip leictreonach nó chrua.

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<https://www.comreg.ie/privacy/>

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Tá an ríomhphost seo, chomh maith le haon iatáin a bhaineann leis faoi rún agus d'fhéadfadh leis a bheith faoi phribhléid nó cosanta ó aon nochtadh. Is don seolaí(aithe) ainmnithe thuas amháin é. Níl sé ceadaithe go mbeidh rochtain ag éinne eile ar an ríomhphost seo. Más rud é nach tusa an faighteoir ainmnithe, ná cló amach, léigh, cóipeáil, nocht d'éinne nó bain úsáid as an eolas sa ríomhphost seo in aon tslí eile, le do thoil. Más rud é go bhfuair tú an ríomhphost seo trí earráid, dean teagmháil leis an seoltóir láithreach agus scríos an t-ábhar ina iomlán, bíodh sé i gcóip leictreonach nó chrua.

## Niamh McHugh

---

**From:** John Bagnall <john.bagnall@eir.ie>  
**Sent:** Friday 13 May 2022 07:28  
**To:** Niamh McHugh  
**Cc:** Órla Murphy  
**Subject:** Re: 211107 - Telecoms Scoping Exercise

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Niamh,

With T6, we can tolerate the encroachment into the buffer zone to within 64.5m, however T7 distance to the link would impact the link and could not go ahead, if you could widen the distance to the same as T6 it could be agreeable.

With T10 we forecast that the CK\_4122-KY\_4140 should be unused by the end of the year 31/12/2022, if your T10 is erected after this time we wouldn't have an issue with it.

Regards,



**John Bagnall**  
Transmission Design & Engineering

E: [john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)  
Address: EirCode - D24 HX03

On Wed, 4 May 2022 at 10:28, Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)> wrote:

Hi John,

In relation to the below, we have carried out modelling based on the links and mast heights you provided to us alongside our current proposed turbine layout and have some queries:

- IHE – KGV:
  - Mapping and modelling shows 1 no. proposed turbine (T6) encroaching on the buffer that you supplied to us for this line, however the blade tip has a clearance of approx. 64.5m from the line itself. Could this be considered as sufficient? Again I would reiterate that there are existing turbines in the area and as far as I am aware these turbines have not caused any issues with your links in this area?
  - 1 no. turbine (T7) encroaches on the buffer you supplied for this turbine, but achieves approx. 17m clearance from the link itself. Could this be considered sufficient?
- CK\_4122 – KY4140:



- We are aware that proposed turbine (T10) falls effectively directly within the path of this link. We are proposing to engage with a telecoms consultant to resolve this issue, but if you have any suggestions or recommendations in relation to this issue, they would be welcomed.

I have attached the current turbine layout here for your reference, as well as the current proposed layout. Looking forward to hearing back from you.

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

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**From:** John Bagnall <[john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)>  
**Sent:** Thursday 7 April 2022 15:17  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** Re: 211107 - Telecoms Scoping Exercise

Niamh,

Yes the minimal clearance is the blade length from the turbine centre point 82m + the 100m buffer from the microwave path centre point. The mast heights are below.

The screen shot is your shape file over layer in Google maps with the paths of the two microwave links and the three turbines that infringe on the buffer and below is the same from your recent screenshot. I have loaded it on MapInfo and your shp file places your turbines in the same location. If this is not lining up with what you are seeing, maybe just give the ING references for now.

		Site ID	Lat	Long	Height AGL			Site ID	Lat	Long	Height AGL
Link1	A-end	CK_4122	51°58'58.29"N	9° 8'37.71"W	25m	<--->	B-end	KY_4140	51°53'56.58"N	9°34'59.98"W	24m
Link7	A-end	IHE	51°56'26.00"N	9°18'20.70"W	31m	<--->	B-end	KGV	51°54'23.34"N	9°26'26.50"W	12m



Regards,

John

On Wed, 6 Apr 2022 at 15:38, Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)> wrote:

John,

Thanks for getting back to me. Could I ask you to clarify a few things for me?

1. When you request a 100m buffer, is that 100m + 82m (blade length)?
2. Could you clarify the heights of these two towers for me? This could avoid an issue if the masts and turbines are much different in height.
3. Can you clarify what is being shown in the screenshotted image that you sent me in your previous email as it doesn't seem to correspond to the turbine layout I sent to you yesterday. I will attach the proposed turbine layout for you here again.

Thanks.

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

[www.mkofireland.ie](http://www.mkofireland.ie)



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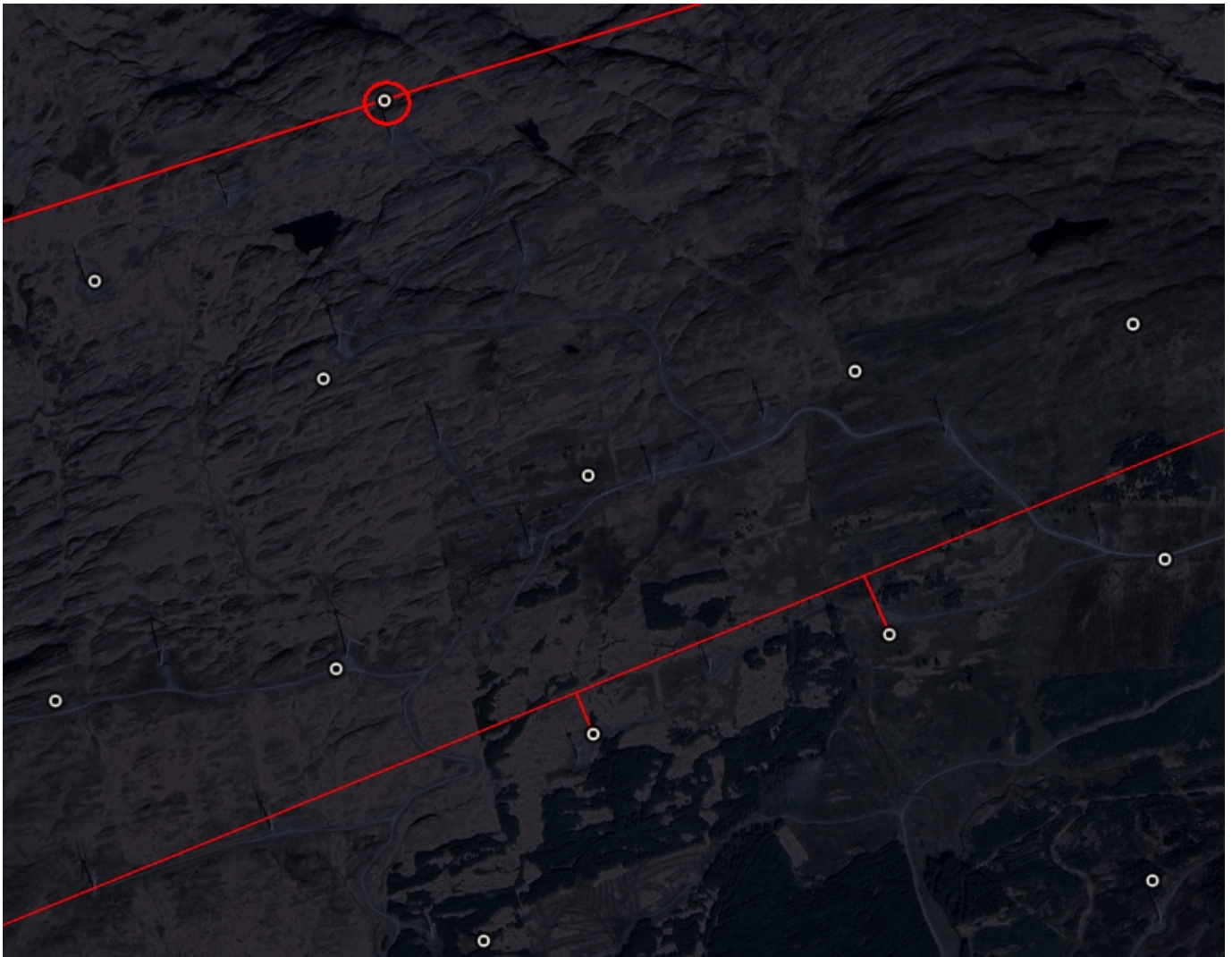
---

**From:** John Bagnall <[john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)>  
**Sent:** Wednesday 6 April 2022 07:20  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** Re: 211107 - Telecoms Scoping Exercise

Niamh,

Ignore the previous email it was meant for Tuam.

Of the 15 turbines in the Kilgarvan Wind Farm I see 3 turbines that are infringing into the 100m buffer T6, T7 + T10. I could accept the T6 position as it's clipping the buffer marginally. Could you re-evaluate the T7 & T10 positions?



Kind regards,



**John Bagnall**

Transmission Design & Engineering

M: +353 85 1053746

E: [john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)

Address: EirCode - D24 HX03

On Wed, 6 Apr 2022 at 07:12, John Bagnall <[john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)> wrote:

Hi Niamh,

The buffer call out below was 100meters, of the three links that were identified which one is restricting you; there is a 6km gap between them?

Kind regards,



**John Bagnall**

Transmission Design & Engineering

M: +353 85 1053746

E: [john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)

Address: EirCode - D24 HX03

On Tue, 5 Apr 2022 at 16:21, Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)> wrote:

Hi John,

Looking at the buffer you have sent on for Link 7 (IHE-KGV), this encompasses 9 no. of the proposed turbines.

I have attached a shapefile here of the current turbine layout we are working with. If you would prefer to view this file in another format please let me know as soon as possible.

The proposed turbine dimensions are as follows:

- Max tip height: 200 meters
- Max rotor diameter: 164 meters

Could I ask that you send me the height of the masts in question (IHE and KGV) so we can more effectively assess this issue? Can you review the max. dimensions alongside the height of the masts and see can you produce a more appropriate buffer based on the fact that there are existing turbines on the site. Currently there are 16 no. existing turbines within the buffer you issued to us.

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

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---

**From:** John Bagnall <[john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)>  
**Sent:** Friday 1 April 2022 15:50  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** [MobileNetworksTXN@eir.ie](mailto:MobileNetworksTXN@eir.ie); Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** Re: 211107 - Telecoms Scoping Exercise

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Hi Niamh,

I checked with operation and link 8 will be inactive next month so you can ignore that link, link 7 IHE-KGV is not seeing any affect by the turbine currently, it's an old link path I am surprised it unaffected at the moment. We use a few different equipment types: the link7 is an Ericsson microwave link using parabolic dishes, the buffer zone is calculated on frequency band, dish size, dish height and Fresnel zone. If the turbine blades close to link 7 were to increase they would certainly impact the traffic on it so these would to be avoided.

Regards,



**John Bagnall**

Transmission Design & Engineering

M: +353 85 1053746

E: [john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)

Address: EirCode - D24 HX03

On Thu, 31 Mar 2022 at 10:33, Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)> wrote:

Hi John,

In relation to the information you have sent me on (below), we are carrying out this telecoms scoping exercise in relation to the **existing Kilgarvan Wind Farm**, which we are currently planning to repower.

Currently, 2 no. of the links ( Link 7: IHE – KGV, and Link 8: IHE-KME) and associated buffers you have sent on encompass 19 no. of the existing turbines. Could you please tell me if the existing turbines have had any effect on these links?

Also, could I ask what type of equipment this is and what determines the buffer?

The planned repowering of this site will include the increasing of the current tip height of the turbines, but the inclusion of less turbines overall. Based on the current proposed turbine layout, the link buffers you have sent on will encompass 9 no. of the new turbines.

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Monday 28 February 2022 11:33  
**To:** John Bagnall <[john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)>  
**Cc:** [MobileNetworksTXN@eir.ie](mailto:MobileNetworksTXN@eir.ie); Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi John,

Thanks for sending those on.

Kind Regards,

Niamh.





Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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Ireland, H91 VW84

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**From:** John Bagnall <[john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)>  
**Sent:** Friday 25 February 2022 18:16  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** [MobileNetworksTXN@eir.ie](mailto:MobileNetworksTXN@eir.ie); Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** Re: 211107 - Telecoms Scoping Exercise

Hi Niamh,

We have a number of transmission links within the area that would be at risk, the end points of the transmission links are below, if you could keep a buffer of 100meters radius away from this transmission path when placing your turbines and send them on for further analysis.

		Site ID	Lat	Long			Site ID	Lat	Long
Link1	A-end	CK_4122	51°58'58.29"N	9° 8'37.71"W	<--->	B-end	KY_4140	51°53'56.58"N	9°34'59.98"W
Link2	A-end	CK_4122	51°58'58.29"N	9° 8'37.71"W	<--->	B-end	KY_4119	51°56'27.83"N	9°18'18.09"W
Link3	A-end	CK_4123	51°55'54.60"N	9° 6'23.30"W	<--->	B-end	KY_4119	51°56'27.83"N	9°18'18.09"W
Link4	A-end	KY_4118	52° 2'46.87"N	9°23'34.42"W	<--->	B-end	KY_4119	51°56'27.83"N	9°18'18.09"W
Link5	A-end	IHE	51°56'26.00"N	9°18'20.70"W	<--->	B-end	CHF	51°54'45.49"N	8°29'25.61"W
Link6	A-end	IHE	51°56'26.00"N	9°18'20.70"W	<--->	B-end	CSE	52° 8'11.45"N	9°27'53.15"W
Link7	A-end	IHE	51°56'26.00"N	9°18'20.70"W	<--->	B-end	KGV	51°54'23.34"N	9°26'26.50"W
Link8	A-end	IHE	51°56'26.00"N	9°18'20.70"W	<--->	B-end	KME	51°52'54.49"N	9°35'58.89"W

Kind regards,



**John Bagnall**

Transmission Design & Engineering

M: +353 85 1053746

E: [john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)

Address: EirCode - D24 HX03

On Wed, 16 Feb 2022 at 09:42, Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)> wrote:

Hi John,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway

## Niamh McHugh

**From:** Peter O'Brien <peter.obrien@enet.ie>  
**Sent:** Thursday 17 February 2022 14:14  
**To:** Niamh McHugh  
**Cc:** Órla Murphy  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

We have two links in this area:

A-End	A-End Antenna Height	B-End	B-End Antenna Height	Frequency	Set Back Distance
51°56'26.00"N 9°18'21.00"W	12m	51°56'18.02"N 9°18'37.58"W	6m	80GHz	50-70m
51°56'26.00"N 9°18'21.00"W	10.25m	51°58'58.37"N 9° 8'37.55"W	15m	18GHz	50-70m

Regards,  
Peter

---

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>  
**Sent:** Thursday, February 17, 2022 11:58 AM  
**To:** Peter O'Brien <peter.obrien@enet.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Peter,

Please see the attached kml file for the same as the below description.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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---

**From:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Sent:** Thursday 17 February 2022 08:55  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

Can you send the area in a Google Earth kml file please?

Regards,  
Peter

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Wednesday, February 16, 2022 9:55 AM  
**To:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** 211107 - Telecoms Scoping Exercise

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Hi Peter,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
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[www.mkoireland.ie](http://www.mkoireland.ie)





NETWORKS

---

# **WINDFARM IMPACT ANALYSIS REPORT**

## **NETWORKS TELECOMS – KILGARVAN WINDFARM IMPACT ANALYSIS**

---

WAN Team  
Network Telecoms  
Three Gateway  
Eastwall Road  
Dublin 3

---



**NETWORKS**

<b>Project Reference</b>	WINDFARM IMPACT ANALYSIS REPORT
<b>Document Title</b>	NETWORKS TELECOMS – KILGARVAN WINDFARM IMPACT ANALYSIS
<b>Prepared By</b>	Myles Redmond

<b>Approved By</b>	
<b>Title</b>	
<b>Date</b>	<a href="#">Click here to enter a date.</a>

#### Version Control

Date	Rev Num	Author	Summary of Change
16/03/2022	Rev 1	Myles Redmond	Initial Document

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## 1 Preliminaries

### 1.1 Purpose of Document

ESB Networks Telecoms has been asked to carry out a Windfarm Impact Analysis by MKO Ireland on a proposed windfarm development near Kilgarvan Co.Kerry. This impact analysis was carried out using the ICS Telecoms Radio planning tool to check the impact that may be caused by the Windfarm on the existing Point to Point and Point to Multipoint Radio network. These radio networks carry critical Operational SCADA traffic for ESB Group and its customers. Impact Analysis

### 1.2 Proposed Kilgarvan Windfarm Boundary

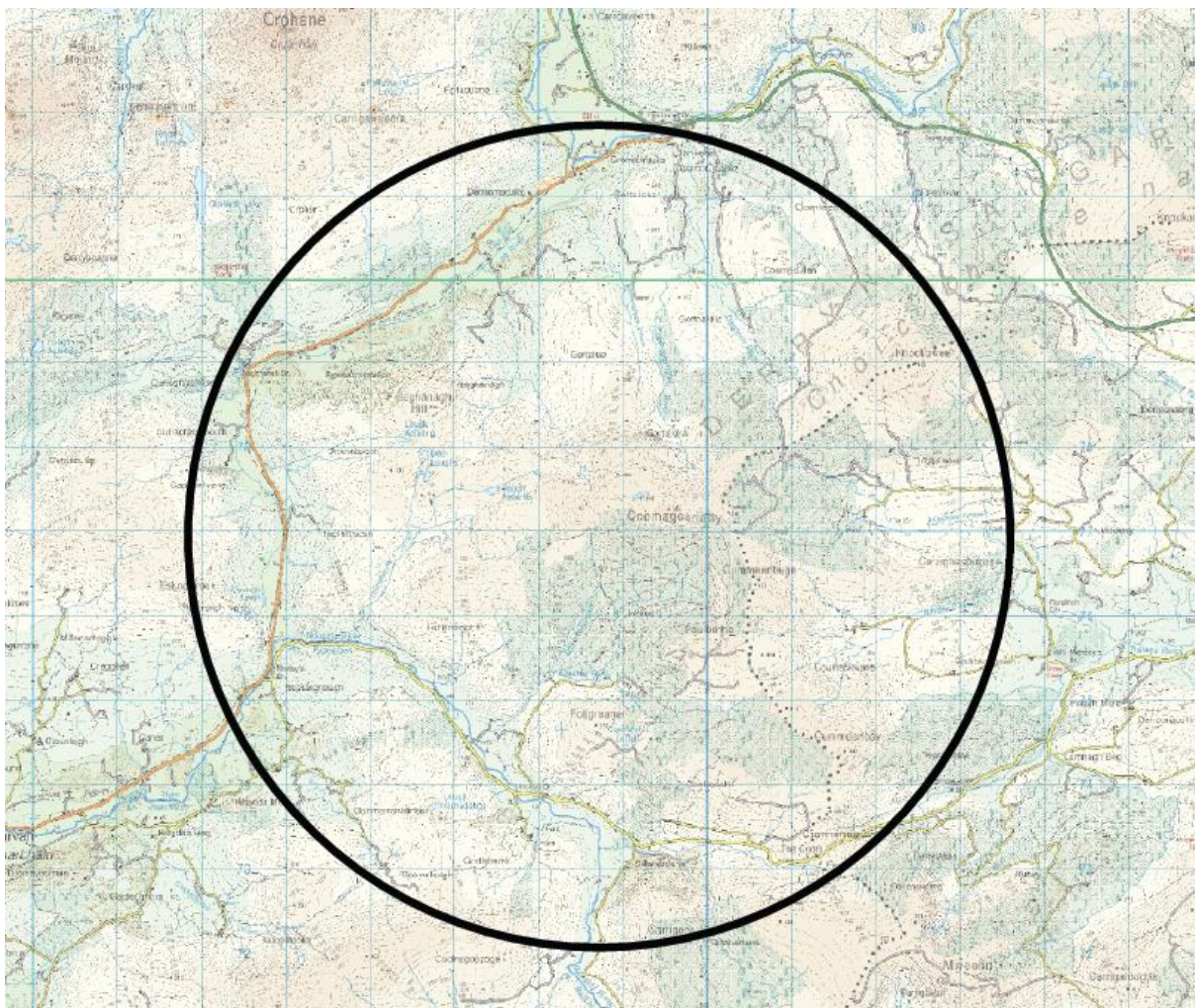


Figure 1 – Outlined KilgarvanWF Boundary



### 1.3 ESB Networks Radio Networks in Operation in the Area

These is a mixture of Point to Point and Point to Multipoint radio links which carry critical Operational SCADA traffic for ESB Networks and Eirgrid passing through the outline area around the proposed Kilgarvan Windfarm.

#### 1.3.1 Point to Point Radio links

There is one radio links that originates within the site boundary which is likely to be impacted by the wind turbines.

##### Link 1: Glanlee 110kV to Mullaghanish

Site A: Glanlee 110kV / 18m AGL / 51.92528374868433, -9.30685967873768/ TX 1371MHz

Site B: Mullaghanish / 8m AGL / 51.98361559417753, -9.143314411262896 / TX 1513MHz

#### 1.3.2 Point to Multipoint Radio links

There are 2 point to multipoint radio link that will be impacted by the planned development:

##### Link 1: Kilgarvan 38kV to Coomagearlaghy 110kV

Site A: Kilgarvan 38kV / 12m AGL / 51.9036932795159, -9.435519882278788 / TX 458MHz

Site B: Coomagearlaghy 110kV / 10m AGL / 51.93837542056511, -9.311313328516553 / TX 458MHz

##### Link 1: Kilgarvan 38kV to Coomagearlaghy 110kV

Site A: Kenmare 38kV / 18m AGL / 51.89088682712732, -9.574585246697408/ TX 458MHz

Site B: Coomagearlaghy 110kV / 10m AGL / 51.93837542056511, -9.311313328516553 / TX 458MHz

### 1.4 Recommended Buffer Clearance Zones

As per the Calculation of the Clearance Zone 3.1.doc by JRC, the buffer clearance zone recommended is the 2nd Fresnel zone clearance plus 150m, a buffer zone to allow for location accuracy of the link ends, turbine construction and ellipsoid conversion anomalies, plus 100m for Turbine micro siting.

The 2nd Fresnel Zone Clearance zone varies with the Frequency but also the link length and the distance of the turbine from Site A and to Site B.

As an example, the link length for Kenmare is 10km, with the turbines approx. at 5km from site A and 5km to site B. For the Point to Multipoint Polling radio link which operate at ~458MHz, This would be 57 (57.2286m) + 150 + 100 = approx. 307m outside the blade tips on both sides of the links.

## 2 Conclusions

Please email ESB Network Telecoms if there is further information required. Once the turbine locations have been identified, can you please contact [myles.redmond2@esb.ie](mailto:myles.redmond2@esb.ie) and [jonathan.walsh@esb.ie](mailto:jonathan.walsh@esb.ie) with the following:

- The turbine locations in Decimal degrees or Irish National Grid Reference
- The turbine dimensions including height of rotor, the blade length, and the maximum tip height
- The guaranteed maximum micro siting of the turbine.

## Niamh McHugh

---

**From:** Ronnie O'Neill <Ronnie.ONeill@imaginegroup.ie>  
**Sent:** Wednesday 16 February 2022 09:51  
**To:** Niamh McHugh  
**Cc:** Órla Murphy; Paul Brunel  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh ,

Imagine have no MW links in this area .

Please send to Paul Brunel ( copied ) going forward and copy me please .  
Can you also include .kml/.kmz files instead of shape files in the future ?

Rgds,  
Ronnie .

---

**From:** Niamh McHugh <n timer> nhamchugh@mkoireland.ie>  
**Sent:** Wednesday 16 February 2022 09:41  
**To:** Ronnie O'Neill <Ronnie.ONeill@imaginegroup.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** 211107 - Telecoms Scoping Exercise

This email originated outside of the organisation - please exercise caution when opening attachments or clicking links.

Hi Ronnie,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)

## Niamh McHugh

---

**From:** Gerard O'Sullivan <gosullivan@ivertec.ie>  
**Sent:** Monday 28 March 2022 15:52  
**To:** Niamh McHugh  
**Cc:** Jimmy Sugrue  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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

Hi Niamh

The proposed development will not impact our network. Thank you for your email.

Kind Regards,

**Gerard O Sullivan**  
Business Development Manager  
Provincial House, Main Street, Caherciveen, Co. Kerry, V23 EH70



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**From:** Jimmy Sugrue <jsugrue@ivertec.ie>  
**Sent:** Monday, March 28, 2022 2:03 PM  
**To:** Gerard O'Sullivan <gosullivan@ivertec.ie>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

Ger,

Can you look after this ?

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Monday 28 March 2022 13:58  
**To:** Jimmy Sugrue <[jsugrue@ivertec.ie](mailto:jsugrue@ivertec.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

Hi Jimmy,

In relation to the below, I was wondering if you had had a chance to review this location?

We are currently compiling a constraints study and would be useful if we could receive this information from you as soon as possible in order to avoid any conflicts.

If there is anything else you need from me in order to carry out your investigation, please get back to me.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>

**Sent:** Monday 21 February 2022 14:27

**To:** [jsugrue@ivertec.ie](mailto:jsugrue@ivertec.ie)

**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

**Subject:** 211107 - Telecoms Scoping Exercise

Hi Jimmy,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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## Niamh McHugh

---

**From:** Niamh McHugh  
**Sent:** Monday 21 February 2022 15:34  
**To:** Arnaud Goulois  
**Cc:** Órla Murphy  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Arnaud,

Thanks for passing on my email.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
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Ireland, H91 VW84  
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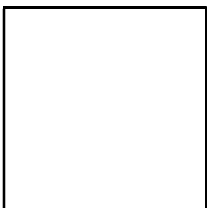
---

**From:** Arnaud Goulois <arnaud.goulois@eir.ie>  
**Sent:** Monday 21 February 2022 15:29  
**To:** Niamh McHugh <n timer>  
**Cc:** Órla Murphy <omurphy@m timer>  
**Subject:** Re: 211107 - Telecoms Scoping Exercise

Hi Niamh,

I forwarded your request to John Bagnall who studies those requests usually.

Regards,  
Arnaud



**Arnaud Goulois**  
Mobile Transmission Design & Engineering | **Eir**

**M:** +33 6 98 57 44 85  
**E:** [arnaud.goulois@eir.ie](mailto:arnaud.goulois@eir.ie)

On Mon, 21 Feb 2022 at 15:30, Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)> wrote:

Hi Arnaud,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

[www.mkoireland.ie](http://www.mkoireland.ie)



## Niamh McHugh

---

**From:** Thomas Barry <Tom.Barry@TETRAIRELAND.IE>  
**Sent:** Monday 28 March 2022 07:20  
**To:** Niamh McHugh  
**Cc:** Colin Fennessy; Órla Murphy  
**Subject:** RE: FROM QUARANTINE: EXTERNAL MAIL:- 211107 - Telecoms Scoping Exercise

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Niamh,

The equipment is Tetra radio services for emergency users including Gardaí, National Ambulance etc.  
If the turbine is moving further away it should reduce the impact.

Regards,  
Tom

---

**From:** Niamh McHugh [mailto:[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)]  
**Sent:** Friday 25 March 2022 15:27  
**To:** Thomas Barry  
**Cc:** Colin Fennessy; Órla Murphy  
**Subject:** RE: FROM QUARANTINE: EXTERNAL MAIL:- 211107 - Telecoms Scoping Exercise

Hi Thomas,

In relation to the below, I was wondering if you had had a chance to investigate this situation?

Looking forward to hearing back from you, thanks.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
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---

**From:** Niamh McHugh  
**Sent:** Monday 28 February 2022 11:23  
**To:** 'Thomas Barry' <Tom.Barry@TETRAIRELAND.IE>



**Cc:** Colin Fennessy <Colin.Fennessy@TETRAIRELAND.IE>; Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: FROM QUARANTINE: EXTERNAL MAIL:- 211107 - Telecoms Scoping Exercise

Hi Thomas,

Thanks for getting back to me on this. From our maps we can see that there is an existing turbine within the Kilgarvan Wind Farm within 500m of your equipment.

Could I ask what type of equipment this is and what determines the buffer?

The project we are scoping for is a repowering of the existing Kilgarvan Wind Farm, there is an **existing turbine** within 315m (approx.) and the replacement turbine will be located approximately 407m from your equipment.

Let me know your thoughts on this please, thanks.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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---

**From:** Thomas Barry <[Tom.Barry@TETRAIRELAND.IE](mailto:Tom.Barry@TETRAIRELAND.IE)>  
**Sent:** Thursday 24 February 2022 15:18  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Colin Fennessy <[Colin.Fennessy@TETRAIRELAND.IE](mailto:Colin.Fennessy@TETRAIRELAND.IE)>  
**Subject:** FW: FROM QUARANTINE: EXTERNAL MAIL:- 211107 - Telecoms Scoping Exercise

Niamh,

We have equipment at E110226/N077230 which may be impacted by this proposal. Can you provide proposed turbine details so that we can fully assess please.

Our standard exclusion zone for this type of development is 500m from the equipment location.

Regards,  
Tom

---

**From:** Derek Rosarius  
**Sent:** Wednesday 16 February 2022 11:38  
**To:** Thomas Barry  
**Subject:** FROM QUARANTINE: EXTERNAL MAIL:- 211107 - Telecoms Scoping Exercise

Didn't scan the attachment

---

**From:** Niamh McHugh [<mailto:nhmchugh@mkoireland.ie>]  
**Sent:** Wednesday 16 February 2022 10:07  
**To:** Thomas Barry  
**Cc:** Órla Murphy  
**Subject:** EXTERNAL MAIL:- 211107 - Telecoms Scoping Exercise

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Hi Tom,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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[www.mkoireland.ie](http://www.mkoireland.ie)



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## Niamh McHugh

---

**From:** Alister Cole <Alister.Cole1@three.ie>  
**Sent:** Thursday 20 October 2022 11:47  
**To:** Niamh McHugh  
**Cc:** Órla Murphy; Sean Kelly; DL Estates ROI  
**Subject:** RE: 211107 - Telecoms Scoping Exercise  
**Attachments:** 3Ireland Potentially affected MW links - Kilgarvan WF.xlsx

Hi Niamh,

I have reviewed the location for the proposed Kilgarvan wind farm and 3Ireland have 2 microwave transmission links that traverse the area and could potentially be affected. I have attached a spreadsheet with the link details. Also below is a GE view. We would require 30m buffer.



Best regards,

Alister



Alister Cole  
Transmission Engineer

**Mobile:** 086 6024556  
**Email:** Alister.Cole1@three.ie

---

**From:** Niamh McHugh <nhamchugh@mkoireland.ie>  
**Sent:** 17 October 2022 16:03  
**To:** Alister Cole <Alister.Cole1@three.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

**CAUTION!** External Email.

Hi Alister,

Thanks for getting back to me. Please see KML of the site location attached here.

Kind regards,  
Niamh

**Niamh McHugh**  
Environmental Scientist

---

**MKO**  
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735 611



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---

**From:** Alister Cole <[Alister.Cole1@three.ie](mailto:Alister.Cole1@three.ie)>  
**Sent:** Monday 17 October 2022 15:39  
**To:** Niamh McHugh <[nhamchugh@mkoireland.ie](mailto:nhamchugh@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

Would you have a google earth kml/kmz available?

Best regards,

Alister



Alister Cole  
Transmission Engineer

Mobile: 086 6024556  
Email: [Alister.Cole1@three.ie](mailto:Alister.Cole1@three.ie)

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** 13 October 2022 17:30  
**To:** Alister Cole <[Alister.Cole1@three.ie](mailto:Alister.Cole1@three.ie)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

**CAUTION!** External Email.

Hi Alister,

I am forwarding this correspondence to you as this I haven't had a reply from the original person I contacted.

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind regards,  
Niamh

**Niamh McHugh**  
Environmental Scientist

---

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---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Wednesday 16 February 2022 09:48  
**To:** [Gerry.Callan@three.ie](mailto:Gerry.Callan@three.ie)

Cc: Órla Murphy <[omurphy@mkofireland.ie](mailto:omurphy@mkofireland.ie)>

Subject: 211107 - Telecoms Scoping Exercise

Hi Gerry,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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### Three Ireland

28/29 Sir John Rogerson's Quay, Dublin 2, Ireland.

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## Niamh McHugh

---

**From:** Keiran Butler <Keiran.Butler@virginmedia.ie>  
**Sent:** Monday 28 March 2022 15:22  
**To:** Niamh McHugh; Mark Nolan  
**Cc:** Cathal O Donnell  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh

This area looks to be west of RTE Mullaghanish and Virgin Media Ireland  
Do NOT have any radio links crossing this area

Can you send a KML/KMZ file for any other inquires  
Liam is no longer working on these projects you can send them on to me

Regards  
Keiran Butler

---

**From:** Mark Nolan <Mark.Nolan@virginmedia.ie>  
**Sent:** Monday 28 March 2022 15:08  
**To:** Keiran Butler <Keiran.Butler@virginmedia.ie>  
**Cc:** Cathal O Donnell <Cathal.ODonnell@virginmedia.ie>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

Hi Keiran,

Can you review over the coming week when time allows?

Thanks

Mark

---

**From:** Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)>  
**Sent:** Monday 28 March 2022 14:56  
**To:** Mark Nolan <[Mark.Nolan@virginmedia.ie](mailto:Mark.Nolan@virginmedia.ie)>; Cathal O Donnell <[Cathal.ODonnell@virginmedia.ie](mailto:Cathal.ODonnell@virginmedia.ie)>; Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Cc:** Órla Murphy <[omurphy@mkofireland.ie](mailto:omurphy@mkofireland.ie)>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

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Hi All,

In relation to the below, I was wondering if you had had a chance to review this location?

We are currently compiling a constraints study and would be useful if we could receive this information from you as soon as possible in order to avoid any conflicts.

If there is anything else you need from me in order to carry out your investigation, please get back to me.



Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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**From:** Niamh McHugh  
**Sent:** Monday 21 February 2022 14:31  
**To:** [mark.nolan@virginmedia.ie](mailto:mark.nolan@virginmedia.ie)  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** 211107 - Telecoms Scoping Exercise

Hi Mark,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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## Niamh McHugh

---

**From:** Lyons, Sean, Vodafone (External) <sean.lyons@vodafone.com>  
**Sent:** Tuesday 10 May 2022 14:43  
**To:** Niamh McHugh; Stephenson, Chris, Vodafone (External)  
**Cc:** Byrne, Gavin, Vodafone; Órla Murphy  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Niamh,

In order to stand the required turbines, you would need to move them to a position that allows for them to be minimum of 30m outside of the Fresnel zones of the links in question.

As the links are existing infrastructure, they will not be moving, or being redirected.

Thanks,

### Seán Lyons

Transmission Program Manager  
Converged Transmission  
Technology- NET  
+353877758117  
[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)



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---

C2 General

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>  
**Sent:** Tuesday 10 May 2022 12:10  
**To:** Stephenson, Chris, Vodafone (External) <chris.stephenson2@vodafone.com>  
**Cc:** Byrne, Gavin, Vodafone <gavin.byrne@vodafone.com>; Lyons, Sean, Vodafone (External) <sean.lyons@vodafone.com>; Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

82m is the correct blade length.

Noted re T2.

Regarding the other turbines which are still within the Fresnel and buffer zones provided, are there any further mitigation or avoidance strategies you could suggest on your end? Would it be possible to bounce these links off other existing masts?

If not, we will have to engage with a telecoms consultant in order to rectify this issue.

Looking forward to hearing back from you on this.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Sent:** Tuesday 10 May 2022 10:33  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,  
Thanks for the co-ordinates.  
T13,T14 & T15 does not clear the 1<sup>st</sup> Fresnel zone + buffer zone.  
T2 is fine.  
The calculations were done using blade radius of 82m, can you confirm if this is the correct radius.

Kind Regards  
Chris

C2 General

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Tuesday 10 May 2022 09:01  
**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

The max. possible blade length we will be working with is 82m.

The turbine co-ordinates (ITM) are as follows:

- T13: X507483.967, Y576521.347
- T14: X506825.103, Y576458.247
- T5: X509410.836, Y576744.266
- T2: 509943.713, Y576565.924

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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---

**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Sent:** Tuesday 10 May 2022 08:02  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,  
Can you provide actual coordinates for T13,T14,T5 and T2 also the blade length for each of these.

Kind regards  
Chris

C2 General

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Monday 9 May 2022 11:53  
**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

Thanks for coming back to me on this. Please see attached a .kml file of the proposed and current turbine locations in Kilgarvan, as well as the max. blade radius (buffer) we will be working with on this project.

If there is anything else you need, please let me know.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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Ireland, H91 VW84  
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**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Sent:** Monday 9 May 2022 10:57  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,  
Can you please provide the blade radius for these locations.  
Also can you send us the KML/KMZ files for the proposed and current locations of the turbines.

Kind Regards  
Chris

C2 General

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Wednesday 4 May 2022 10:24  
**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

In relation to the below, we have carried out modelling of the masts and links you provided along with our current turbine layout and have produced some conclusions:

- KYIHE – KY037:
  - 1 no. proposed turbine (T13) is located very close to the link, but there is currently an operational turbine in the same location (T7). Can I ask has there been any issues recorded or reported

regarding these turbines to date? If not would, would you consider negating the need to avoid this link?

- 1 no. turbine (T14) blade minimally encroaches on the Fresnel zone you provided to us, but has a clearance of 4.5m from the link itself. Would you consider this clearance distance of 4.5m from the link to be sufficient? As with the previous point, there are two existing turbines (T8 and T9) immediately adjacent to this proposed turbine which have very similar clearance distances from the link and encroachment on the buffer. Have there been any issues reported in the past with turbines on this link?
- KYIHE – KY085:
  - We note that proposed turbine (T5) is currently located effectively directly in the path of this link. We are proposing to consult with a telecoms consultant to find a solution for this issue, however, if you have any solutions you could suggest that would be appreciated also.
- KYIHE – KY016:
  - As with the above point, there is a proposed turbine (T2) within close proximity to this line, but it is worth mentioning that there is an existing turbine (T14) in the same location as the proposed new turbine. Have there been any issues reported regarding this to date?

I have also attached here our current proposed turbine layout and the existing turbine layout for your reference. We are proposing to engage with a telecoms consultant regarding some turbines which are particularly close to links, but again, if you have any suggestions as to how we could avoid these issues, please let us know.

Looking forward to hearing back from you.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

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**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Sent:** Tuesday 12 April 2022 09:47  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,  
Please see below.

Kind regards  
Chris

Site	Height M
KYIHE	40
KY037	30
KY085	11
KY016	31

C2 General

**From:** Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)>

**Sent:** Tuesday 12 April 2022 08:40

**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>

**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkofireland.ie](mailto:omurphy@mkofireland.ie)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

Thanks for clarifying that for me.

Could I request that you send me on the heights of the masts listed below please?

- KYIHE
- KY037
- KY085
- KY016

Many thanks.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkofireland.ie](http://www.mkofireland.ie)



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**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>

**Sent:** Wednesday 6 April 2022 11:21

**To:** Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)>

**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External)

<[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,

The Fresnel zone is calculated in meters plus a buffer zone of 30m.

If a turbine blade infringes the 30m buffer zone then further analysis is required to assess the impact.

Kind regards

Chris

C2 General

---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>

**Sent:** Tuesday 5 April 2022 17:06

**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>

**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

In relation to the below, is the Fresnel zone calculated as Xm from the end of the blade? Or from the centre of the turbine? The current blade length we are looking at is 82m.

Could you also please let me know if there is a possibility of reducing any of these buffers?

Thanks.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**

Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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---

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>

**Sent:** Friday 1 April 2022 09:50

**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>

**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise



Hi Chris,

Many thanks for sending that on.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
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**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Sent:** Friday 1 April 2022 09:42  
**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>  
**Subject:** RE: 211107 - Telecoms Scoping Exercise

Hi Niamh,  
Please see below.

Kind regards  
Chris

Link	Fresnel Radius
KYIHE-CKMGH	17.01
Inchee-Cashelmore	17.01
KYIHE-KY085	4.32
KYIHE-KY037	13.18
KYIHE-KY016	12.27
Inchee-Curra Ross	12.89

C2 General

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Wednesday 30 March 2022 14:17  
**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

Cc: Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>

Subject: RE: 211107 - Telecoms Scoping Exercise

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Hi Chris,

In relation to the information you have sent me on (below), would you also be able to provide me with a buffer/Freznel zone for these links?

Many thanks

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
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**From:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>

**Sent:** Tuesday 29 March 2022 10:17

**To:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>; Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>

**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>; Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>

**Subject:** RE: 211107 - Telecoms Scoping Exercise

You don't often get email from [chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com). [Learn why this is important](#)

Hi Niamh,  
Please find below response.

Kind regards  
Chris

Link Name / ID	Band MHz\GHz	Link Length Km	Site A			
			Lat	Long	Easting	North
KYIHE-CKMGH	18Ghz	12.12	051-56-26.02 N	009-18-21.09 W	110246	7724
Inchee - Cashelmore	11Ghz	42.73	051-56-26.02 N	009-18-21.09 W	110246	7724
KYIHE-KY085	26Ghz	6.5	051-56-26.02 N	009-18-21.09 W	110246	7724
KYIHE-KY037	13Ghz	30.3	051-56-26.02 N	009-18-21.09 W	110246	7724

KYIHE-KY016	15Ghz	19.76	051-56-26.02 N	009-18-21.09 W	110246	772
Inchee-Curraross	11Ghz	24.38	051-56-26.02 N	009-18-21.09 W	110246	772

C2 General

**From:** Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>  
**Sent:** Monday 28 March 2022 15:25  
**To:** Stephenson, Chris, Vodafone (External) <[chris.stephenson2@vodafone.com](mailto:chris.stephenson2@vodafone.com)>  
**Cc:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

Hi Chris,

Can you please look into this proposed windfarm and send you findings to Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)> & Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>?

Thanks,

**Seán Lyons**

Transmission Program Manager  
 Converged Transmission  
 Technology- NET  
 +353877758117  
[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)



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C2 General

**From:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>  
**Sent:** Monday 28 March 2022 15:20  
**To:** Lyons, Sean, Vodafone (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>  
**Cc:** Neill o', Shane, Vodafone <[shane.oneill2@vodafone.com](mailto:shane.oneill2@vodafone.com)>; Cassidy, Emma, Vodafone <[emma.cassidy@vodafone.com](mailto:emma.cassidy@vodafone.com)>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

Hi Sean,

Can you ask one of the team to look at the attached windfarm please?



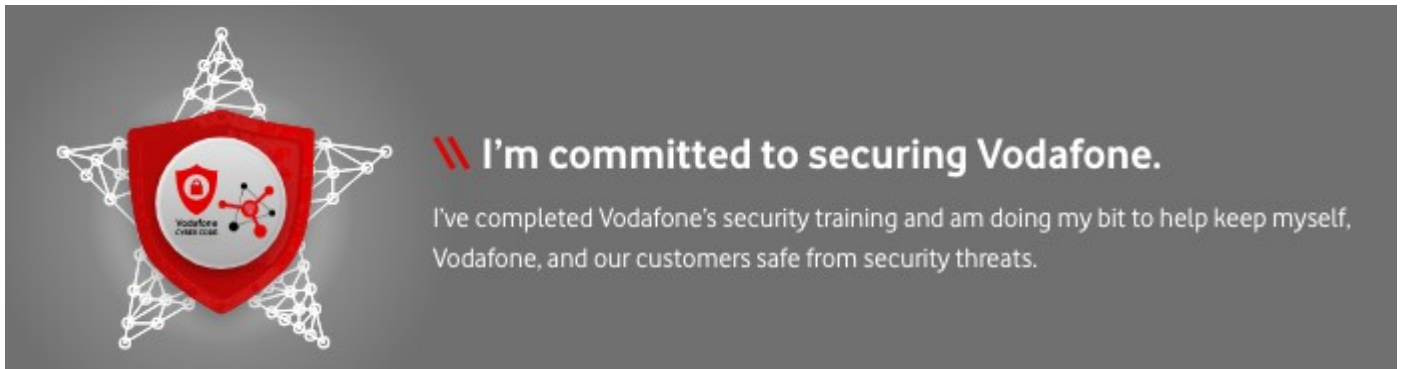
**Gavin Byrne**

Senior TX Planning & Design Engineer  
 Converged Transmission  
 +353 876448159  
[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)

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C2 General

**From:** Niamh McHugh <[nhmchugh@mkoireland.ie](mailto:nhmchugh@mkoireland.ie)>  
**Sent:** Monday 28 March 2022 14:59  
**To:** Byrne, Gavin, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** FW: 211107 - Telecoms Scoping Exercise

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Hi Gavin,

In relation to the below, I was wondering if you had had a chance to review this location?

We are currently compiling a constraints study and would be useful if we could receive this information from you as soon as possible in order to avoid any conflicts.

If there is anything else you need from me in order to carry out your investigation, please get back to me.

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



**From:** Niamh McHugh <[nhmchugh@mkofireland.ie](mailto:nhmchugh@mkofireland.ie)>

**Sent:** Wednesday 16 February 2022 09:53

**To:** [gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)

**Cc:** Órla Murphy <[omurphy@mkofireland.ie](mailto:omurphy@mkofireland.ie)>

**Subject:** 211107 - Telecoms Scoping Exercise

Hi Gavin,

We are currently working on a constraints study for the Kilgarvan Wind Farm Co. Kerry, located approximately 23km northeast of Kenmare and approximately 12km northeast of Kilgarvan Village. The approximate centre of the site is X506446, Y576363.

The site location can be seen in the Figure attached, and I have also attached the relevant shapefiles for your convenience.

Could you let me know if you have any links in this area, and we will incorporate these into our constraints mapping process. If any such links are in place, could you also please send me on their associated buffers.

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

Kind Regards,  
Niamh.



Niamh McHugh B.Sc (Env)  
Graduate Environmental Scientist

**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
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## Niamh McHugh

---

**From:** Howard Jones <howard.jones@kerryairport.ie>  
**Sent:** Monday 14 November 2022 10:13  
**To:** Niamh McHugh  
**Cc:** Órla Murphy; John Mulhern  
**Subject:** RE: 211107 - Orsted Kilgarvan Wind Farm Repowering

Good morning Niamh,

Based on the information provided the closest point to Kerry Airport is 30Km and the highest ground level is 447M AMSL.

With a maximum mast tip height of 200m this would convert to a maximum tip height of 2133ft AMSL.

If you can confirm that this is correct the development should not impact on the Airports operations.

Regards,

**Howard Jones**  
Chief Operating Officer

email: [howard.jones@kerryairport.ie](mailto:howard.jones@kerryairport.ie)

**KERRY AIRPORT IRELAND**

Farranfore, Killarney, Co. Kerry, Ireland. V93 KH7  
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---

**From:** Niamh McHugh <n timer> nhmchugh@mkoireland.ie>  
**Sent:** Thursday 10 November 2022 10:08  
**To:** Howard Jones <howard.jones@kerryairport.ie>  
**Cc:** Órla Murphy <omurphy@mkoireland.ie>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

---

### EXTERNAL MAIL

This message originated from outside Kerry Airport.

---

Hi Howard,

In relation to the phone conversation we had earlier this morning, please see the following co-ordinate points relating to the Proposed Repowering of Kilgarvan Wind Farm:

- North-east point: 51.941167651, -9.304647337
- South-east point: 51.927494217, -9.302229612
- Westerly point: 51.931498073, -9.360731950

I can confirm that the proposed turbines would be of a **maximum** 200m tip height above ground. The existing 28 no. turbines on that site will be decommissioned before the proposed turbines are constructed.

Please get back to me if there is any further information you require from us in relation to this development.

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84

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---

**From:** Niamh McHugh  
**Sent:** Wednesday 9 November 2022 12:14  
**To:** [info@kerryairport.ie](mailto:info@kerryairport.ie)  
**Cc:** Órla Murphy <[omurphy@mkoireland.ie](mailto:omurphy@mkoireland.ie)>  
**Subject:** FW: 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

I am just catching up on whether you have had a chance to review the attached and below information as issued on 22<sup>nd</sup> July of this year.

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind regards,  
Niamh

**Niamh McHugh BSc. (Env)**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84



Offices in Galway and Dublin

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**From:** Niamh McHugh

**Sent:** Friday 22 July 2022 16:24

**To:** [info@kerryairport.ie](mailto:info@kerryairport.ie)

**Subject:** 211107 - Orsted Kilgarvan Wind Farm Repowering

Sir/Madam,

MKO has been engaged to carry out an Environmental Impact Assessment Report for the proposed Repowering of turbines in Orsted Kilgarvan Wind Farm, Co. Kerry. The proposed Development is located approximately 5.5km northeast of the village of Kilgarvan, Co. Kerry.

Orsted intends to apply for the decommissioning of 28 no. existing turbines and replace them with up to 15 no. wind turbines. The details of the Proposed Development are outlined in the attached scoping document and cover letter.

If you have any questions, queries or comments in relation to the attached, please do not hesitate to get back to me. Any comments would be welcomed

Kind Regards,

Niamh.



Niamh McHugh B.Sc (Env)

Graduate Environmental Scientist

**MKO**

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Ireland, H91 VW84

+353 (0) 91 735611

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