

Environmental Impact Assessment

Cummeennabuddoge Wind Farm

Technical Appendix 2-2: Scoping Responses

Cummeennabuddoge Wind DAC

October 2022



From: BCI Info <info@batconservationireland.org>
Sent: 26 September 2021 07:49
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Morning Richard,
Bat Conservation Ireland is a small wildlife charity and does not have the administrative capacity to provide comments. All wind farm projects require a full bat survey according to best practice guidelines.

Regards,
Bat Conservation Ireland

From: Richard Newsham
Sent: Friday 24 September 2021 15:23
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Good afternoon,

I am referring to an email that we sent on or around the 25 August 2021 where we requested your views to the scope of various assessments. This was to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

This email is a reminder that comments can be submitted by email to _____ by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Kind regards,

Richard Newsham
Project Manager



From: Roger Woods
Sent: 27 September 2021 14:52
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Richard

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

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

From: Richard Newsham
Sent: Friday 24 September 2021 14:38
To: Roger Woods
Cc: Reception BAI <reception@bai.ie>
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Good afternoon Roger,

We have previously discussed the Cummeennabuddoge Wind Farm project previous (correspondence from 15 March – 16 March).

We are at the consultation stage of the project and have issued a Scope of Works report with an indicative layout for consultee comments. I issued this request to you but as you can see a failed delivery receipt (attached) has been received. I anticipate this is due to file size and therefore I have reduced the report to text only and shared with you turbine coordinates and dimensions via an excel table.

This email and enclosed letter and report are being issued to you as part of the consultation process for the EIAR.

This does not represent a formal Request for a Scoping Opinion, but an informal request for seeking your views to the scope of the various assessments.

We would be interested in receiving any comments or observations you may have on the proposed development relevant to your area of expertise.

I would be grateful if you could confirm receipt of this email.

Kind Regards,

Richard Newsham
Project Manager



From:
Sent: 27 August 2021 10:44
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Richard,
I can confirm the planned development will have no impact on the BT Ireland microwave network.

Regards

Padraig Condon
Core Network Operations



This email contains information from [insert appropriate legal entity name, e.g British Telecommunications plc, BT Nederland NV, BT Americas Inc, BT Australasia Pty Ltd] which may be privileged or confidential. It's meant only for the individual(s) or entity named above. If you're not the intended recipient, note that disclosing, copying, distributing or using this information is prohibited. If you've received this email in error, please let me know immediately on the email address above. Thank you. We monitor our email system, and may record your emails.

From: Richard Newsham
Sent: 25 August 2021 17:04
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Atmos Consulting Ltd ('Atmos'), acting as agent on behalf of Cummeennabuddoge Wind Designated Activity Company (DAC) (for and on behalf of Coillte CGA and SSE Renewables) ('the Applicant') has prepared a Scope of Works Report to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

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Yours sincerely

Richard Newsham
Project Manager



From: Greg Simpson
Sent: 20 September 2021 15:00
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Categories: Red Category

Richard

With regard to the above I would comment as follows.

A request for informal comments on the scope of the various assessments for the proposed EIAR for a 19 turbine wind farm and associated development at Clydaroe, Cummeennabuddoe, Clonkeen (It is noted that most of the proposed development is within Kerry County Councils jurisdiction while the proposed grid connection is within Cork).

- 925 hectare site (commercial forestry)
- Max of 19 turbines (up to 114 MW)
- Tip height – up to 200m (possibly highest in country)
- Rotor diameter of up to 162m
- Possible underground connection to existing 220/110kV Ballyvouskill substation (Cork)

It is considered that the approach proposed is appropriate and addresses the normal key requirements.

The proposed Grid connection does not appear to involve any public roads. It is considered that underground is preferable. Full detailed proposals shall be included in EIAR.

Any such proposal needs to be mindful of recent Judicial Review overturning permission for Derryadd Windfarm (SID - APB) [2020 No. 557 JR Peter Sweetman applicant, An Bord Pleanála, Attorney General respondents, Bord na Móna Powergen Limited] in June 2021.

Please do not hesitate to contact me if you need to discuss the proposal further

Regards

Greg

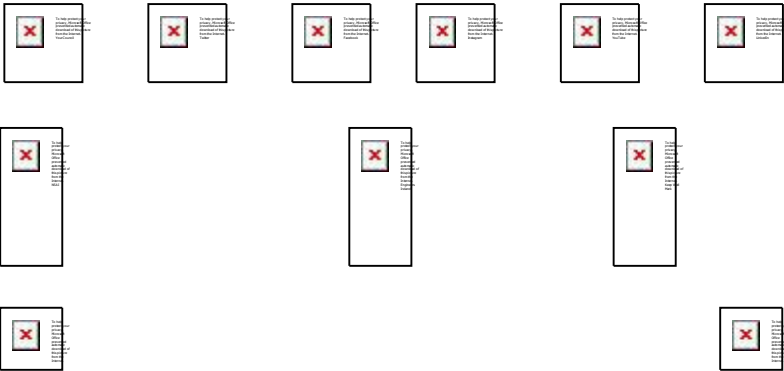
Greg Simpson | Pleanálaí Feidhmiúcháin Sinsearach | Pleanáil agus Forbairt
Comhairle Contae Chorcaí | Halla an Chontae | Corcaigh | T12 R2NC | Éire

Tairseach na gcustaiméirí: www.yourcouncil.ie

Customer Portal: www.yourcouncil.ie

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

www.corkcoco.ie



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

Tá an t-eolas sa ríomhphost seo (agus in aon chomhad a ghabhann leis) rúnda agus ceaptha i gcomhair úsáide don seolaí amháin. Mura seolaí tú, níl tú údaraithe an ríomhphost nó aon cheangaltán a léamh, a chóipeáil nó a úsáid. Má bhfuair tú an ríomhphost seo trí bhotún, ar mhiste leat é sin a chur in iúl don seoltóir trí r-phost ar ais agus ansin é a scriosadh.

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27/08/2021

Atmos Consulting,
CBC House,
24 Canning Street,
Edinburgh,
EH3 8EG.

Re: **E.I.A.R. Scoping Request for the proposed Cummennabuddoge Wind Farm located at Clydaghroe and Cummeenabuddoge, Clonkeen, 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**. Tel: 076-1064459, Web <https://www.agriculture.gov.ie/forestservice/treefelling/treefelling/>

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

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

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

Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

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

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

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and
- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees,

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

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

and

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

Yours sincerely,

Tara Hendley
Felling Section
Department of Agriculture, Food and the Marine
Johnstown Castle
Co Wexford

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: 08 September 2021 13:22
To: Richard Newsham
Cc: Gareth O'Flaherty (Defence); Sarah Zacharia (Defence)
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation
Attachments: FW: Cummeenabuddoge Wind Farm Development, Co Kerry

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Newsham,

I refer to your e-mail below and to your letter dated 25 August, in relation to a proposed windfarm development located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry.

As a matter of practice, the Department of Defence does not provide any observations or advice in the Pre-planning process, except where the relevant parties have been directed by a planning authority to seek the Department's views.

The Minister for Defence 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.

However, please be advised, we have already provided observations/feedback on this same proposed windfarm to Mr. David McGrath of Ai Bridges back on 22 June 2021.
(see attached observations)

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.

From: Richard Newsham
Sent: Wednesday 25 August 2021 17:04
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Dear Sir/Madam

Atmos Consulting Ltd ('Atmos'), acting as agent on behalf of Cummeennabuddoge Wind Designated Activity Company (DAC) (for and on behalf of Coillte CGA and SSE Renewables) ('the Applicant') has prepared a Scope of Works Report to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

This email and enclosed letter and report are being issued to you as part of the consultation process for the EIAR.

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We would be interested in receiving any comments or observations you may have on the proposed development relevant to your area of expertise.

Comments can be submitted by email to _____ by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Yours sincerely

Richard Newsham
Project Manager



From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Subject: FW: Cummeenabuddoge Wind Farm Development, Co Kerry

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Tuesday 22 June 2021 10:44
To: [REDACTED]
Cc: Gareth O'Flaherty (Defence)

Subject: FW: Cummeenabuddoge Wind Farm Development, Co Kerry

Dear Mr. McGrath,

In response to your e-mail below re. proposed Wind Farm development at Cummeenabuddoge, 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 An Bord Pleanála, as appropriate.

Based on the information supplied and having consulted with our Air Corps colleagues, The Department of Defence would like to make the following observations:

1. All turbines should be illuminated by high intensity obstacle lights that will allow the hazard be identified and avoided by aircraft in flight.
2. Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum specifically at or near 850nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.
3. Due to the nature of flight operations by the Irish Air Corps the above lighting requirements are separate to ICAO and IAA lighting requirements.

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.

Furthermore, we would appreciate if you could keep us informed on all developments relating to this proposed development, especially in regards the observations made by the Minister for Defence/Department of Defence.

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.

From: Defence Property Management Planning

Sent: Friday 11 June 2021 16:16

To:

Cc: Jason Kearney (Defence)

Sarah Zacharia (Defence)

Gareth O'Flaherty (Defence)

Subject: FW: Cummeenabuddoge Wind Farm Development, Co Kerry

Dear Mr. McGrath,

The Department of Defence wishes to acknowledge receipt of your e-mail.

We will take this e-mail under consideration and revert in due course.

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.

From: [REDACTED] >

Sent: Wednesday 9 June 2021 16:05

To: Defence Info <info@defence.ie>

Cc: [REDACTED] >

Subject: RE: Cummeenabuddoge Wind Farm Development, Co Kerry

Dear Sir/Madam,

Apologies for the short notice, but we are looking to conclude our Telecommunications Impact Assessment Statement for the proposed Wind Farm development at Cummeenabuddoge.

If you have any concerns regarding this development, we would be grateful if you could let us know by this week.

Best Regards,
David McGrath.

Ai Bridges



From: O'Buachain. Feargal (Customer Solutions)
Sent: 27 September 2021 09:59
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Richard,

I work for ESB Telecoms Limited and the only site of ours near Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry is Mullaganish MW and the only customer on this mast is ESB Telecoms Services.

Feargal O' Buachain | Site Consultant | ESB Telecoms Ltd | T: +353 1 702 6622 / +353 87 687 3775

Website www.esbtelecoms.ie
Join us on [LinkedIn](#)

From: Richard Newsham
Sent: Monday 27 September 2021 09:48
To: O'Buachain. Feargal (Customer Solutions)
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Feargal,

Thank you for your response. Would it be possible to confirm the customers that you are referring to?

May you also confirm which part of ESB you are contacting from as your email signature refers to ESB Telecoms. As you say we are talking to them also so do not want to duplicate responses.

Thanks,

Richard Newsham
Project Manager

From: O'Buachain. Feargal (Customer Solutions)
Sent: 27 September 2021 09:35
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Richard,

Your proposed location does not have any impact on our customers.

I see that you are talking to ESB Telecoms Services, they could be impacted

Feargal O' Buachain | Site Consultant | ESB Telecoms Ltd |

Website www.esbtelecoms.ie

Join us on [Linkedin](#)

From: Richard Newsham

Sent: Friday 24 September 2021 15:23

To: Richard Newsham

nsultation

Good afternoon,

I am referring to an email that we sent on or around the 25 August 2021 where we requested your views to the scope of various assessments. This was to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

This email is a reminder that comments can be submitted by email to _____ by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Kind regards,

Richard Newsham
Project Manager

From: GSI Planning <GSIPlanning@GSI.ie>
Sent: 28 September 2021 10:44
To: Richard Newsham
Cc: Clare Glanville; GSI Planning
Subject: RE: EIS 21/312 Cummeennabuddoge Wind Farm Co Kerry
Attachments: 21_312_Cummeennabuddoge_Wind_Farm_Co_Kerry_Final.pdf; GSI datasets relevant to EIA & SEA_20210421.pdf

Dear Richard,

With reference to your letter dated 25 August 2021, concerning the Cummeennabuddoge Wind Farm – Environmental Impact Assessment Proposed Scope of Work, please find attached response and dataset sheet from Geological Survey Ireland.

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

Yours sincerely,

Trish Smullen
Geological Survey Ireland

From: GSI Planning
Sent: 26 August 2021 14:19
To: Clare Glanville; Sophie O'Connor; Brian McConnell; Monica Lee; Taly Hunter Williams; Sean Cullen; Charise McKeon; Jim Hodgson; Eoin McGrath
Cc: GSI Planning
Subject: EIS 21/312 Cummeennabuddoge Wind Farm Co Kerry

EIS 21/312

Cummeennabuddoge Wind Farm Co Kerry.

Request for observations by Atmos Consulting before Wednesday 20 October.

Scoping document attached.

Regards,
Trish

From: Richard Newsham
Sent: 25 August 2021 17:03
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Dear Sir/Madam

Atmos Consulting Ltd ('Atmos'), acting as agent on behalf of Cummeennabuddoge Wind Designated Activity Company (DAC) (for and on behalf of Coillte CGA and SSE Renewables) ('the Applicant') has prepared a Scope of Works Report to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

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Yours sincerely

Richard Newsham
Project Manager





Richard Newsham
Atmos Consulting

28 September 2021

Re: Cummennabuddoge Wind Farm – Environmental Impact Assessment Proposed Scope of Work

Your Ref: 61253-01-C3-V1

Our Ref: 21/312

Dear Richard,

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, useful when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

With reference to your letter dated 25 August 2021, concerning the Cummennabuddoge Wind Farm – Environmental Impact Assessment Proposed Scope of Work, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

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

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

The CGSs for 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 within the site boundary of the proposed windfarm.**

Groundwater

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



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 Resources (Aquifer) Data Viewer indicates a “Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones” underlies the site boundary of the proposed windfarm. The Groundwater Vulnerability map indicates groundwater vulnerability is variable within the site boundary. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability in your assessments, as any groundwater-surface water interactions that might occur would be greater in these areas.

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

Geological Mapping

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

Geotechnical Database Resources

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

Geohazards

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

Landslides are common in areas of peat, rock near surface and in fine to coarse range materials (such as glacial tills). **The Landslide Susceptibility map indicates variable landslide susceptibility along the preferred route option, including areas of ‘Moderately High’ to ‘High’ susceptibility.** Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated [Map Viewer](#). Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.

Natural Resources (Minerals/Aggregates)

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



In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used in the proposed wind farm are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Other Comments

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

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

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

Yours sincerely,

Clare Glanville
Senior Geologist
Geological Survey Ireland

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



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

ENVIRONMENTAL HEALTH SERVICE
Health Service Executive South
Unit 4, Liber House
Monavalley Business Park
Tralee
Co. Kerry V92 EE6K
Tel: (066) 7184992/064

Date: 13th October 2021

Name: Mr Richard Newsham, Atmos Consulting, Linden House, Mold
Business Park, Wrexham Road, Mold, Flintshire, Wales CH71XP

Consultant's reference: 61253-01-C3-V1

Re: Scoping Report

Proposed development: Proposed Cummeennabuddoge Wind Farm, Clonkeen, Co. Kerry

Applicant: Cummeennabuddoge Wind (DAC)

EHIS Reference: 1939

Dear Mr Newsham

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 03 September 2021

- Emergency Planning – David O'Sullivan
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher/ Helen Mulcahy
- CHO – Michael Fitzgerald

If you have any queries regarding this report the initial point of contact is Mr John Moynihan, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours sincerely

John Moynihan
Principal Environmental Health Officer



HSE South Emergency Management Consultation Report

Report to	John Moynihan, PEHO, Kerry	Date	6 th Sept., 2021
Type of consultation: EIS <input type="checkbox"/> Scoping X Screening <input type="checkbox"/> EIAR <input type="checkbox"/> EPA <input type="checkbox"/>			
Other (please specify):			
Authority	Health Service Executive		
Consultants Ref. Number	61253-01-C3-V1 EHIS 1939		
EM Reference Number	EMENV097		
Applicant	Atmos Consulting Ltd.on behalf of Cummeenabuddoge Wind Farm / Coillte & SSE Renewables		
Proposal	Development of wind farm at Cummeenabuddoge, Clonkeen, Co. Kerry		

HSE South Emergency Management Observations:

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

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

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

HSE EIA Scoping

Environmental Health Service Submission Report

Date: 13.10.21

Our reference: EHIS 1939

Report to: Mr Richard Newsham, Project Manager, Atmos Consulting, Linden House, Mold Business Park, Wrexham Road, Mold, Flintshire, Wales CH71XP

Consultant's Reference: 61253-01-C3-V1

Type of Consultation: EIA Scoping

Proposed development: Proposed Cummennabuddoge Wind Farm, Clonkeen, Co. Kerry

Applicant: Cummeennabuddoge Wind Designated Activity Company (DAC)

Proposed Development: The Cummeennabuddoge Wind Designated Activity Company (for and on behalf of Coillte CGA and SSE Renewables Ltd.) intends to apply planning permission for the construction of a wind farm of up to 19 No. wind turbines with a combined proposed output of approximately 114MW. The site of the proposed windfarm is on land at Clydaghroe and Cummeennabuddoge, Clonkeen, predominately in Co Kerry with some grid connection infrastructure proposed within Co Cork between the village of Ballyvourney and the town of Millstreet. The development will also include associated infrastructure including electrical transformers, hardstandings, access roads, borrow pits, 110kV grid connection and a 100kV air insulated substation.

General Introduction

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

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

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

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

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

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

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

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

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

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

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

The HSE will consider the final EIAR accompanying the planning application and will make comments to Kerry County Council and/or Cork County Council on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 26 August 2021

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

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

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

Public Consultation

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

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

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

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

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

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

Decommissioning Phase

It is noted on page 15 of the Technical Report that the proposed operational lifetime of the wind farm is 30 years.

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

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

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

Siting, Location and details of Turbines

The EIAR should include a map and a description of the proposed location of each of the proposed wind turbines within the 925 hectare site.

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

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

Opportunity for Health Gain

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

Assessment of Consideration of Alternatives

The EIAR should consider an assessment of alternatives. In addition to the 'Reasonable Alternatives' indicated in Chapter 3 of the Technical Report, 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. Impacts during both the proposed 18 month construction phase and the operational phase should be addressed. 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 background levels.

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

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

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

Shadow Flicker

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

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

Air Quality

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

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

- Truck inspection and maintenance plan
- Details of a road maintenance agreement between the wind farm operator and the Local Roads Authority to clarify responsibility for the upkeep and repair of access roads during the construction phase of the project.

Surface and Ground Water Quality

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

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

Geological impacts

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

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

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

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

Ancillary Facilities

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

Cumulative Impacts

The Technical Report indicates that there are a number of existing wind farms within the vicinity of the proposed development. 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 other wind farm developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed renewable energy development.

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

Tom Sugrue
Environmental Health Officer,
Environmental Health Service,
HSE South,
Unit 4, Liber House,
Monavalley Industrial Estate,
Monavalley,
Tralee,
Co. Kerry

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

From: Karen Griffin
Sent: 07 October 2021 15:37
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Richard Newsham
Project Manager

RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Dear Richard,

I refer to the request for an informal comment, with view to scoping document in preparation of an Environmental Impact Assessment (EIA) for Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

The site of the proposed development encompasses the Clydagh River and tributaries, all part of the Flesk and Killarney Lake system. All waters are significant salmonid fisheries under the Killarney National Park, Macgillycuddy's Reeks And Caragh River Catchment SAC, and must be protected.

Therefore, IFI would ask that the following requirements should be taken into consideration.

1. There should be no drainage or other physical interference with the bed or bank of any watercourse on site, including those not identified on OSI maps, without prior consultation with IFI.

Watercourses must not be incorporated as mitigation measures.

2. Suspended solids or hydrocarbon contaminated must be controlled adequately to ensure that that no deleterious matter enters ANY watercourse. More specifically IFI feels the following issues should be addressed

During the construction phase, IFI recommends areas to be zoned:

- i. Identifying and zoning the project for environmental impact should a peat slip occur or significant participation conditions,
- ii. Setting out contingency plan should a peat movement occur.
- iii. Setting out a plan for the control of silt in such a scenario, including measures to be put in place at the initial stages of construction.

3. Any crossing of watercourses will require further consultation with IFI to ensure,

(i) The free passage of fish at all times.

(ii) The original slope of the riverbed should be maintained with no sudden drops on the downstream side. Design details on any proposed crossing should be incorporated at planning stage, mitigation measures identified if required.

(iii) Span bridges preferable to culverts.

(v) All instream works should be carried out only in the July-September period.

Karen Griffin
Fisheries Environmental Officer
Kerry

Iascach Intíre Éireann
Inland Fisheries Ireland

Tel 0035 26 41221 Mob +353 (87)1231102
Email

Web www.fisheriesireland.ie

Regional Office: Sunnyside house, Masseytown, Macroom, Co Cork, Ireland. | Eir code P12X602.

Help protect Irelands inland Fisheries
Call 1890 347424. To report illegal fishing, water pollution or invasive species.

From: Michael Connolly
Sent: 26 August 2021 09
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation [Filed 26 Aug 2021 16:48]

Follow Up Flag: Follow up
Flag Status: Flagged

Richard,

I would note that the proposed site bounds a protected archaeological landscape (Kerry County Development Plan) to the north and the impacts on this landscape must be addressed as part of any assessment

Regards
Dr Michael Connolly,
County Archaeologist

From: Richard Newsham
Sent: Wednesday 25 August 2021 17:31
To: plan <plan@kerrycoco.ie>; environ <environ@kerrycoco.ie>; Victoria McCarthy ; roads
<roads@kerrycoco.ie>; Water Services <WaterServices@kerrycoco.ie>; Michael Connolly <Fiona O'Sullivan (nee Galvin)>
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

[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.

Dear Sir/Madam

Atmos Consulting Ltd ('Atmos'), acting as agent on behalf of Cummeennabuddoge Wind Designated Activity Company (DAC) (for and on behalf of Coillte CGA and SSE Renewables) ('the Applicant') has prepared a Scope of Works Report to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghrone and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

This email and enclosed letter and report are being issued to you as part of the consultation process for the EIAR.

This does not represent a formal Request for a Scoping Opinion, but an informal request for seeking your views to the scope of the various assessments.

We would be interested in receiving any comments or observations you may have on the proposed development relevant to your area of expertise.

Comments can be submitted by email to _____ by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Yours sincerely

Richard Newsham
Project Manager

From: Richard Newsham
Sent: 18 October 2021 11:28
To: 'Mark O'Sullivan'
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation [Filed 18 Oct 2021 11:27]

Hi Mark,

Thank you for confirming this. We look forward to speaking to you at the pre-application advice meeting for the Cummeennabuddoge Wind Farm Project.

Kind regards,

Richard Newsham
Project Manager

From: Mark O'Sullivan
Sent: 13 October 2021 12:00
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Richard,

I discussed your meeting request with my line manager. I understand that he has spoken to Planning Section, Kerry County Council on the matter. He has suggested that any further discussions on water quality should form part of a pre-planning meeting.

Regards Mark.

From: Richard Newsham
Sent: 08 October 2021 16:06
To: Mark O'Sullivan
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

[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.

Good afternoon Mark,

Just following up on the email below to determine whether you have had a chance to look into the Scope of Works report in more detail?

Given the sensitivity of water quality in this area I would suggest a meeting to discuss this particular sensitivity. Please let me know when works best for you in the next 2 weeks.

Kind regards,

Richard Newsham
Project Manager

From: Richard Newsham
Sent: 14 September 2021 10:09
To: 'Mark O'Sullivan'
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Good morning Mark,

Thank you for your comments. This has been identified as a sensitivity for the project and has been addressed as part of the scoping report. I think the most valuable sections for your consideration in this regard will be Section 11: Hydrology, Water Quality and Flood Risk and the Water Quality Monitoring Plan found in the Appendix. Have you had an opportunity to review this?

Given the sensitivity of water quality in this area I would suggest a meeting to discuss this particular sensitivity. Are you available for a call in the next 2 weeks?

Kind Regards,

Richard Newsham
Project Manager

From: Mark O'Sullivan
Sent: 03 September 2021 12:12
To: Richard Newsham
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Richard,

I work in the Environment Section, Kerry County Council. I had a quick look at the consultation document for the proposed windfarm in the Clydagh Valley. Our overriding concerns would be on the potential impact on surface water quality downstream of the proposed development particularly during the construction phase of the proposed development. I would suggest that attention is placed on any potential downstream impacts particularly as the Clydagh River is a tributary of the River Flesk, which in turn constitutes the main water body flowing into Lough Leane.

Regards Mark.
Environment Section,
Kerry County Council.

From: environ <environ@kerrycoco.ie>
Sent: Thursday 26 August 2021 09:05
To: Michael Boyce
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Mick, FYi received at environ email.

Environment Section
Kerry County Council
Tel: 066 7162000
EXT2000

From: Richard Newsham
Sent: Wednesday 25 August 2021 17:31
To: plan <plan@kerrycoco.ie>; environ <environ@kerrycoco.ie>; Victoria McCarthy ; roads
<roads@kerrycoco.ie>; Water Services <WaterServices@kerrycoco.ie>; Michael Connolly
Fiona O'Sullivan (nee Galvin) <
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

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This email and enclosed letter and report are being issued to you as part of the consultation process for the EIAR.

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We would be interested in receiving any comments or observations you may have on the proposed development relevant to your area of expertise.

Comments can be submitted by email to _____ by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Yours sincerely

Richard Newsham
Project Manager

From: Fiona O'Sullivan (nee Galvin)
Sent: 17 November 2021 15:04
To: Richard Newsham
Cc: Dawn Diggins
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation [Filed 17 Nov 2021 16:33]
Attachments: 61253 R2 Cummeennabuddoge_Scoping_Issued.pdf

Hi Richard.

Your pre-planning query has been sent to me as the Killarney Area Planner.

I have reviewed the informal Scope of Works Report. I have a few points to make in relation to the planning considerations. The most notable of which is that the site is outside of the area zoned as "Open to Consideration" in the Renewable Energy Strategy in the Kerry County Development Plan 2015-2021. Also the site is located in an area zoned as "secondary Special Amenity" in the County Development Plan.

I will forward this email to the Environmental Assessment Section of KCC to see if they wish to make any further comment and I will revert to you regarding same if they do.

Regards

Fiona O'Sullivan
Killarney Area Planner

From: Dawn Diggins
Sent: 16 November 2021 15:56
To: Fiona O'Sullivan (nee Galvin)
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Fiona

Pre planning reference no PP 21/564.

Thanks
Dawn

From: Richard Newsham
Sent: Wednesday 25 August 2021 17:31
To: plan <plan@kerrycoco.ie>; environ <environ@kerrycoco.ie>; Victoria McCarthy ; roads
<roads@kerrycoco.ie>; Water Services <WaterServices@kerrycoco.ie>; Michael Connolly >;
Fiona O'Sullivan (nee Galvin)
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

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Comments can be submitted by email to . by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Yours sincerely

Richard Newsham
Project Manager

Malcolm Sangster

From: Drainage Admin <drainage.admin@opw.ie>
Sent: 01 November 2021 10:21
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation
Attachments: 61253 R2 Cummeennabuddoge_Scoping_Issued.pdf

Dear Richard,

I refer to your email below and attached correspondence.
Apologies for delay in reply.

I would like to advise that given the proposed development has no interaction with any Office of Public Works (OPW) arterial drainage scheme this office will not be providing any comment.

Kind regards
Karen

From: Richard Newsham <
Sent: Wednesday 25 August 2021 17:04
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Dear Sir/Madam

Atmos Consulting Ltd ('Atmos'), acting as agent on behalf of Cummeennabuddoge Wind Designated Activity Company (DAC) (for and on behalf of Coillte CGA and SSE Renewables) ('the Applicant') has prepared a Scope of Works Report to inform a consultation process for the Environmental Impact Assessment Report (EIAR) to support a future planning application in relation to a proposed wind farm located on land at Clydaghroe and Cummeenabuddoge, Clonkeen, County Kerry (the 'Proposed Development').

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Comments can be submitted by email to _____ by the 20th of October 2021. If you have no comments to make, I would be grateful if you would please acknowledge receipt of this letter.

Yours sincerely

Richard Newsham
Project Manager

From: Johnny Evans
Sent: 26 August 2021 10:07
To: Richard Newsham
Cc: Matthew Craig; windfarms
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Richard, thank you for sending us this scoping letter.

Further to our previous correspondence on this proposal we are concerned that this development could disrupt our distribution network for National Broadcast Radio and TV services in Cork and Kerry. We are also concerned that it has the potential to directly disrupt TV reception for viewers in north Co. Cork. We would like to discuss this proposal with you further before a planning application is made – and would be grateful if you could send us proposed turbine locations (and any other details) once they are available so that we can carry out a more detailed assessment of the potential risk.

Thanks and regards, Johnny

Johnny Evans

Head of Projects and Coverage Planning

2RN

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

From: windfarms <windfarms@rte.ie>
Sent: Wednesday 25 August 2021 17:05
To: Johnny Evans
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

From: Richard Newsham
Sent: Wednesday, August 25, 2021 5:03:41 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Dear Sir/Madam

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From: INFO <Information@tii.ie>
Sent: 20 September 2021 12:31
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Dear Mr. Newsham,

Thank you for your email of 25 August 2021 regarding the above. The position in relation to your enquiry is as follows.

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

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

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

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

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

- TII notes that the subject site adjoins the local road network. Access to the road network shall be developed in accordance with official policy and road safety considerations, as outlined above. Consultations should be had with the relevant Local Authority/National Roads Design Office with regard to locations of existing and future national road schemes,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development; N22, national primary road,
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any EIAR/EIS and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts,
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works),

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

It is noted that the EIAR Scoping Report identifies Ringaskiddy Port as the entry point for turbine components with the N28, N40 and N22, national primary roads, the potential delivery route to site.

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

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

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

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the recent publication of

the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

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

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

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

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

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

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

Yours sincerely,

Alban Mills
Senior Regulatory & Administration Executive
Ref No. TII21-114666



From: Richard Newsham
Sent: Wednesday 25 August 2021 17:04
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

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

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Yours sincerely

Richard Newsham
Project Manager

From: Power, Robert, Vodafone (External)
Sent: 26 August 2021 10:12
To: Richard Newsham
Cc: Lyons, Sean, Vodafone (External)
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation [Filed 26 Aug 2021 16:52]

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Richard,

There appears to be plenty of clearance for both of the Vodafone link previously highlighted.

Kind Regards,
Robert



C2 General

From: Lyons, Sean, Vodafone (External)
Sent: Thursday 26 August 2021 08:34
To: Power, Robert, Vodafone (External)
Cc: Richard Newsham
Subject: FW: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

Hi Rob,

Can you look after this analysis please?

Please send your findings back to Richard.

Thanks,

Seán Lyons

Transmission Program Manager
Converged Transmission
Technology- NET



[Vodafone.ie](https://www.vodafone.ie)

Together We Can!

Vodafone Ireland Limited, Registered Office:
MountainView, Leopardstown, Dublin 18,
Registered in Ireland: No. 326967

C2 General

From: Richard Newsham

Sent: Wednesday 25 August 2021 17:05

To: Power, Robert, Vodafone (External)

; Lyons, Sean, Vodafone (External)

; Byrne, Gavin, Vodafone

; Neill o', Shane, Vodafone

; Byrne, Fiona, Vodafone (External)

; Farrell, Eamon,

Vodafone

Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. Please follow the Cyber Code and report suspicious emails.

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Yours sincerely

Richard Newsham
Project Manager



Malcolm Sangster

From: Info @ Waterways Ireland <info@waterwaysireland.org>
Sent: 26 August 2021 16:51
To: Richard Newsham
Subject: RE: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation [Filed 26 Aug 2021 17:16]

Hi Richard

This has no impact on Waterways Ireland.

Kind Regards

Nuala Maguire

Marketing & Communications
Waterways Ireland – Enniskillen HQ
Presently Working Remotely

“Waterways Ireland, managing and promoting the inland waterways for the benefit of all...”



Please consider the environment before printing this email.

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Sent: 25 August 2021 17:04
To: Richard Newsham
Subject: Cummeennabuddoge Wind Farm - Scope of Assessments Consultation

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