



White Hill Wind Farm Electricity  
Substation & Electricity Line

## Environmental Impact Assessment Report

### Annex 1.4: Kilkenny County Council Scoping Response

White Hill Wind Limited

Galetech Energy Services

Clondargan, Stradone, Co. Cavan Ireland

Telephone +353 (0)49 555 5050

[www.galetechenergyservices.com](http://www.galetechenergyservices.com)



## Steph Smart

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**From:** Mary Shephard <Mary.Shephard@kilkennycoco.ie>  
**Sent:** 15 May 2024 15:22  
**To:** Steph Smart  
**Subject:** Scoping request for electricity substation and underground cables at Shankill, Paulstown, Co Kilkenny  
**Attachments:** image001.emz; image003.emz

Steph

In regard to the scoping request received 26<sup>th</sup> March please see as follows.

The applicant is advised of the opinion of Kilkenny County Council in response to Scoping Document received on 26<sup>th</sup> March 2024 as part of EIAR Scoping process for a proposed substation and grid connection in County Kilkenny, as follows:

The applicant shall formally consult inter-alia the following bodies:

### External

- Irish Water
- TII
- Inland Fisheries
- EPA
- Bord Gais
- ESB
- Commission for the Regulation of Utilities
- EirGrid
- OPW
- HSE
- An Taisce
- Dept of the Environment, Climate and Communications
- National Monuments Service
- National Parks and Wildlife Service

Kilkenny County Council has contacted the above listed agencies; where responses have been received by the Council the recommendation of these agencies are set out below and shall be taken into consideration by the applicant in the preparation of the EIAR.

### Responses Received

#### **Uisce Éireann's Response to EIA Scoping Requests**

At present, Uisce Éireann does not have the capacity to advise on the scoping of individual projects. However, in general the following aspects of Water Services should be considered in the scope of an EIA where relevant;

a) Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann's Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified as part of the report.

b) Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert.

- c) Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response.
- d) Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions.
- e) Impacts of the development on the capacity of water services (*i.e. do existing water services have the capacity to cater for the new development*). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network.
- f) The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the proposed development.
- g) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network.
- h) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers.
- i) Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets.
- j) When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to [datarequests@water.ie](mailto:datarequests@water.ie)
- k) Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- l) Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report.
- m) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (*and resultant potential impact on the capacity of the source*) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.
- n) Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a "protected"/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report.
- o) Uisce Éireann does not permit building over of its assets. As an applicant you are required to;
- survey the site to determine the exact location of the assets. Any trial investigations should be carried out with the agreement and in the presence of Uisce Éireann.
  - Provide evidence of separation distances between the existing Uisce Éireann assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details.
- p) Where a diversion of Public Infrastructure may be required subject to layout proposal of the development and separation distances, the applicant is required to submit a Diversions Enquiry to [diversions@water.ie](mailto:diversions@water.ie)

q) Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water).

*This is not an exhaustive list.*

**Please note;**

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

**Gas Networks Ireland response:**



GNI Code of Practice  
for Working in Vicinity



Safety Advice for  
working in the vicinity

**Kilkenny County Council**

**Internal**

- Environment Section – no comments received
- Roads Section – no comments received
- Area Engineer – no comments received
- Heritage Officer – no comments received.
- Conservation Officer – no comments received,.

**Planning Department:**

Having regards to the prominent location of the proposed development site close to an upland scenic area and Protected Views V13 and its location in close proximity of Natura 2000 sites, the Dinin River and built heritage and national monuments/archaeology along the grid connection route, the proposed substation and grid connection will require a thorough assessment of potential impacts on these sensitive receptors to include the cumulative impacts with other wind farm proposals and grid connection infrastructure in the surrounding area.

The applicant is advised to fully comply with the requirements of Directive 2014/52/EU on the effects of certain public and private projects on the Environment (EIA Directive) and any resulting amendments to the Planning and Development Act 2000 as amended and the Planning and Development Regulations 2001, as amended. The applicants should also comply with the requirements of the '*Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment*' and any updates subsequent to the above Directive.

**Road Design Section:**

No comments received, however the following was the response for the initial Windfarm SID scoping referral:

The main issues arising for any proposed wind farm development from a road perspective will occur during the construction phase of the project for both the wind farm construction itself and the ducting route to the preferred grid connection point.

However, noting this the investigations in respect of both would need to be developed to such a point to ensure and assure the planning authority that the proposals are technically feasible and have the necessary permissions if beyond the public road extents as part of the documentation submitting for planning approval. Such matters cannot be left entirely to any subsequent road opening permission process.

#### Wind Farm Site:

The applicant will be required to provide a detailed surveyed drawing of the proposed temporary and permanent site access arrangements showing the required sightlines in accordance with the TII Design Manual for Roads and Bridges. In general, where the access off the local road network is proposed a minimum visibility splay/sightline of 90m to the nearside road edge both directions from a point 2.4m back from the proposed entrance will be required as a minimum. In the case of regional roads this should be 145m. It is preferable to minimise the number of permanent accesses onto the road network.

The construction make-up of the entrance area shall be detailed. At a minimum the first 5m off the roadway edge should be a tarmac surface falling away from the public road to avoid ponding on the public road. The drainage arrangements shall also be detailed for both the entrance area and the access roads within the development site. The existing roadside drainage shall remain unaffected and where necessary accommodated for.

The applicant will be requested to provide a photographic & FWD survey of Turbine Delivery Route (TDR) in particular in the case of local roads and possibly regional routes. This would be carried out prior to construction and included by way of condition on a successful planning application and a stipulation on any road opening permission. Any damage arising to be addressed at the contractors own expense.

Where temporary works are required to the TDR on third party properties to facilitate the delivery of wind turbine elements, demonstration of landowner consent will be required. Where such works are required proposals shall be designed using a detailed survey for each temporary works area. Depending on the nature, complexity and duration of proposed temporary works a Road Safety Audit may be required. This can be advised upon as proposals are developed.

Identify and structurally assess structures on the route of the TDR, in particular when crossing the regional and local road network. Where structures on National Routes will be impacted consultation and approval from the TII structures will be required. Where structural works are required on the road network these will need to be detailed. To note for example in order to increase depths of cover to increase the structural strength an overlay may be suggested. However, the structural strength of in particular masonry structure may not be adequate for same and alternative proposals may be required. Parapets will also need to be considered if raising of road levels is being considered.

The applicant shall be conditioned to prepare and agree a construction and traffic management plan with the Municipal District Engineer prior to commencement of the development works. (Likely will be included as a condition but the principle of assessing the route would need to be included. This will also form part of the road opening licence.)

Identify as necessary all temporary works as necessary for delivery of materials to the site.

Where temporary works are required on third party properties to facilitate the delivery of components, written consent of the relevant landowner consent will be required. Where such works are required proposals shall be designed using a detailed survey for each temporary works area. Depending on the nature, complexity and duration of proposed temporary works a Road Safety Audit may be required. This can be advised upon as proposals are developed.

Depending on the access route proposed and its suitability it may be necessary for the applicant to submit proposals for the provision of passing bays along the local road for example and provide a drawing indicating the locations and construction detail.

The applicant shall provide details of the proposed development traffic generation for the construction, operational and decommissioning phases in order to assess the potential impact on the road network.

The applicant shall submit a glint and glare assessment of the proposed development on users on the public road network particularly from a road safety perspective. A road safety audit may be required in this regard.

The internal layout of access roads within the wind farm should be detailed. Also, it shall be confirmed how the large ground surface areas under/between the windfarm is to be maintained. i.e. grassed areas etc. It is noted that sheep are sometimes allowed to roam to keep such grasses maintained etc.

Where it is necessary to remove existing road signage to facilitate abnormal loads to the development careful consideration to the provision and location of temporary signage or retrofitting of existing signage with socketed bases to aid removal/replacement. The precise details of these will be addressed in the context of the road opening permission but reference to what is intended or proposed should be contained in the planning documentation.

Identify and structurally assess structures on the access route to the site if abnormal loads are proposed, in particular when crossing the regional and local road network. Where structures on National Routes will be impacted consultation and approval from the TII structures will be required. Where structural works are required on the road network these will need to be detailed. To note, for example, in order to increase depths of cover to increase the structural strength an overlay may be suggested. The structural strength of in particular masonry structure may not be adequate for same and alternative proposals may be required. Parapets will also need to be considered if raising of road levels is being considered.

However, noting this the investigations as to the suitability of the construction access route proposed will need to be developed to such a point to ensure and assure the planning authority that the proposals are technically feasible and have the necessary permissions if located outside the public road extents as part of the documentation submitted for planning approval. Such matters cannot be left entirely to any subsequent road opening permission process.

Where service diversions are required (ESB, Eircom, etc) the applicant shall liaise with the relevant service providers and reference any changes proposed in the planning documentation.

The expected time period for any TDR phase should be referenced within the context of the overall expected construction period.

#### Grid connection matters:

The applicant will need to confirm and be clear if it is intended to apply for planning permission for the cable route as part of the wind farm planning application itself, separate to it or solely in the context of a road opening permission. The means of connection to the grid shall need to be confirmed. Overhead or underground?

Whichever is the case in the context of the wind farm itself, a reasonable degree of consideration of construction and traffic management required for the cable route installation should form part of the planning application. It is noted that EIA and AA Screening normally forms part of wind solar farm applications and should include consideration of the cable routes. The principles of the suitability of the cable route should be detailed in the planning documentation to show it is technically feasible, albeit recognising that the detailed consideration may be for a different procedure.

Where the installation of underground cables as part of the grid connection is proposed, the applicant shall be requested to provide trench reinstatement details for the proposed underground cabling for the various locations where it is to be installed, i.e., roadside verge, carriageway, agricultural and domestic entrances, within or below structures etc.

All trenching and duct installation works in the public roads shall comply with the Guidelines for Managing Openings in Public Roads (DTTAS) and the line and layout shall be agreed with the Municipal District Engineer as a condition of the road opening licence. Existing road drainage needs careful consideration in any proposals so that it is unaffected. In addition, the applicant shall take into consideration the requirements of the specification for the reinstatement of openings in National Roads as published by National Roads Authority as required. It will be a requirement that roadways be fully reinstated progressively as the ducting work proceeds.

Consultation with TII where the duct route crosses the national road network either via under bridge or over bridge will be required, particularly where this crossing is proposed to coincide with such structures. (It is noted that TII do not generally favour ducting longitudinally between roadside boundaries along the extent of national roads even if located in verges beyond the roadway edges. If such are proposed they need to be re-considered.)

Careful consideration shall be given to ESB requirements and cover levels when ducting through structures. Raising of road levels to facilitate cover levels will only be considered on a case by case basis but may not be an acceptable solution. Where structural works are required these will need to be detailed. To note for example in order to increase depths of cover on ducting an overlay may be suggested. However, the structural strength of a particular masonry structure may not be adequate for same and alternative proposals may be required. Parapets will also need to be considered.

Chamber construction details and locations shall be submitted for assessment.

Where ducting works impact third party properties either directly or indirectly landowner's consent is required in the case of the former and possibly a higher standard of re-instatement works for the latter (i.e. where ducting runs across an existing access re-instatement may include the full extents of the access.)

The applicant shall advise of any wayleaves and the extents of same of required.

General Observation on cable grid connection routes.

Multiple wind and solar farms can propose connection to the same ESB substations and proposed routes may coincide. There was a recent windfarm proposal in the vicinity of Bilboa which may propose a similar cable route connection to this application. Consideration to co-ordination and amalgamation may need to be considered as existing roads may and are unlikely to be insufficient to accommodate multiple cable runs.

Other Considerations which are likely to form some of the conditions if granted:

A bond may be required in respect of any potential road damage arising from the construction of the proposed development and the Municipal District Engineer shall determine this requirement as a condition of the road opening licence.

Should this application be the subject of a grant of permission, the applicant is likely to be conditioned to carry out a Falling Weight Deflectometer (FWD) and photographic visual record surveys of the route between the proposed development and the regional/national road network prior to commencement of the proposed development. The surveys shall be repeated on completion of the development and the extent of any repairs to the road network if any arising from this development shall be determined and agreed with the Municipal District Engineer and the applicant shall cover the costs of these repairs. These requirements will be repeated as required as part of any road opening permission.

Road Closures and Diversions shall be applied for through the relevant local Municipal District Office of Kilkenny County Council. This would form part of the conditions of any planning plus any subsequent road opening permission. Costs arising are a matter for the developer.

Permits are required for the transportation of abnormal loads to the site. This will likely be referenced as a requirement in respect of any road opening permission to be granted for works.

The applicant is advised that all works to the public road are subject a road opening and the conditions attached therein.

Regards  
Mary Shephard



*Mary Shephard*

**Kilkenny County Council**  
Planning Department  
County Hall, John Street  
Kilkenny

**Comhairle Chontae Chill Chainnigh**  
Roinn Pleanála  
Halla an Chontae, Sráid Eoin  
Chill Chainnigh

056 7794391

[mary.shephard@kilkennycoco.ie](mailto:mary.shephard@kilkennycoco.ie)

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

