

White Hill Wind Farm Electricity Substation & Electricity Line

Environmental Impact Assessment Report

Annex 1.7: Scoping Responses

White Hill Wind Limited

Galetech Energy Services

Clondargan, Stradone, Co. Cavan Ireland

Telephone +353 (0)49 555 5050

www.galetechenergyservices.com



Steph Smart

From: Corporate.Services <Corporate.Services@garda.ie>

Sent: 30 April 2024 09:45 **To:** Steph Smart

Subject: RE: Pre-application Scoping Request

Dear Steph

With reference to your correspondence below dated 21st March 2024, this office can report in relation to the proposed location of cabling, there appears to be no specific issue arising from An Garda Síochána point of view.

Sent on behalf of Superintendent J. Molony, Corporate Services, Garda Headquarters, Dublin D08 HN3X.

Phone: 01-6661253

Email: Corporate.Services@garda.ie



From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Monday 25 March 2024 12:01

To: Corporate.Services < Corporate.Services@garda.ie>

Subject: Pre-application Scoping Request

Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>

Clondargan, Stradone, Co. Cavan, Ireland

www.galetechgroup.com



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Steph Smart

From: Roger Woods < rwoods@cnam.ie>

Sent: 27 March 2024 10:57

To: Steph Smart

Subject: RE: Pre-application Scoping Request

Hi Steph

Coimisiún na Meán does not perform an in-depth analysis of the effect of wind turbines or electrical sub stations on FM networks. However, we are not aware of any issues from existing windfarms or electrical sub stations into existing FM networks. Also, the proposed sub station is not located close to any existing or planned FM transmission sites.

Regards

Roger

Senior Executive Engineer

My email address has now changed to rwoods@cnam.ie, please update your address book accordingly.

Tá mo sheoladh ríomhphoist athraithe anois go rwoods@cnam.ie, dá réir sin déan do leabhar seoltaí a uasdátú, le do thoil.

Coimisiún na Meán | 1 Áras Shíol Bhroinn, Bóthar Shíol Bhrionn, Baile Átha Cliath 4, D04 NP20, Éire Coimisiún na Meán | 1 Shelbourne Buildings, Shelbourne Road, Dublin 4, Dublin D02 XP29, Ireland T: + 353 (0)1 644 1200 | rwoods@cnam.ie







BRONZE

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 <u>info@cnam.ie</u>, agus an ríomhphost seo a scrios.

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From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Monday 25 March 2024 12:06

To: Reception CnaM < reception@cnam.ie > **Subject:** Pre-application Scoping Request

You don't often get email from steph.smart@galetechenergy.com. Learn why this is important

Dear Sir/Madam.

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

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steph.smart@galetechenergy.com

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Steph Smart

From: Dawn Quinn <admin@batconservationireland.org>

Sent: 25 March 2024 15:18

To: Steph Smart

Subject: RE: Pre-application Scoping Request

Dear Steph,

Thank you for your e-mail.

Unfortunately, as Bat Conservation Ireland is a very small organisation, with limited resources, we do not have the capacity to get involved in planning issues.

Please note that Bat Conservation Ireland is concerned that a request for our input/consultation/opinion/assistance on planning applications and reports, or objections/comments on same, can sometimes imply that we have been consulted for our opinion on planning matters when Bat Conservation Ireland does not, in fact, provide opinions or comments on developments. Therefore, please note that this response should not be construed as a consultation with Bat Conservation Ireland regarding any planning or development matter or proposal. In order to avoid misunderstandings, please do not use this terminology in your reports to describe this transaction.

Thank you for your understanding.

Yours sincerely

Dawn Quinn Administrative Manager Bat Conservation Ireland

Postal/Registered Address: Carmichael House, 4-7, North Brunswick Street, Dublin 7, D07 RHA8.

E-mail: admin@batconservationireland.org Website: www.batconservationireland.org

Social Media: Bat Conservation Ireland - Home | Facebook | https://twitter.com/BatConservIre



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Bat Conservation Ireland. Company Limited by Guarantee (CRO) No. 494343. Charity Number (CRA): 20039417. Website: www.batconservationireland.org | Registered Address: Carmichael House, 4-7, North Brunswick Street, Dublin 7, D07 RHA8.

From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Monday, March 25, 2024 12:04 PM

To: BCI Info <info@batconservationireland.org>; Dawn Quinn <admin@batconservationireland.org>

Subject: Pre-application Scoping Request

To whom it may concern,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

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Ind May 2024

Galetech Energy Services, Clondargan, Stradone, Co. Cavan, H12 NV06. Oifigí an Chontae, Bóthar Átha Í, Ceatharlach, R93E7R7

County Buildings, Athy Road, Carlow, R93E7R7

T: 059 9170300

E: See carlow.ie/contact-us

W: carlow.ie

RE: Your ref: WHI001SS.

Pre-Application Scoping Request for Proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny.

A Chara,

I refer to your correspondence dated 25th March 2024 in relation to the above.

Following a review of the content of the scoping document, and a planning appraisal of the site, it is recommended that the following comments are issued:

Grid Connection and Cumulative Impacts

You are advised to have regard to relevant case law stemming from the decision of the High Court in the judgement delivered for O'Grianna v. An Bord Pleanála (2014), namely the requirement for EIA to consider the cumulative impacts of the proposed turbines with the proposed grid connection. This follows that the proposed grid connection is an integral part of an entire wind farm project and therefore must be included in the EIAR when examining cumulative impacts. The aforesaid may have implications for the scope of the planning application and the extent of the proposed development for which permission will be sought. The 'Draft Revised Wind Energy Development Guidelines December 2019', recently issued by the Department of Housing Planning and Local Government are further noted in this regard, which address the matter of grid connections in Section 4.7.4:

Under EU EIA guidance 10, challenges in the EIA process are recognised for projects comprised of different elements which may be permitted at different stages, implemented by different parties and developed over a period of time.

Case law on this issue acknowledges that the requirements of the EIA Directive may be satisfied by multiple consents necessitated by the different stages in delivering a project. It should be noted that the EU courts have also stressed that the purpose of the Directive cannot be circumvented by the splitting of projects.

The Irish Courts have determined the need to assess such projects comprising both the wind energy development element and the subsequent grid connection element, as a single

project for EIA purposes11, and in particular their cumulative effects. This approach is reflected in Recital (22) and Annex II.A, Annex III and Annex IV to the 2011 EIA Directive as revised by the 2014 Directive12. In addition, Recital (2), of the 2011 EIA Directive13 also emphasises that the importance of the effects on the environment should be taken into account at the earliest possible stage in all the technical planning and decision—making process.

In the context of EIA, best practice is that an integrated planning application is made for the whole project (i.e. the wind energy development and the grid connection and any other works which are ancillary to the development of the wind energy development) and that the EIAR submitted with the planning application addresses the cumulative impacts of the whole project.

It is acknowledged that an integrated application is not always possible, because of the distinction between power generation and transmission infrastructure from an energy regulatory framework perspective.

However, in order to ensure that the environmental issues arising in the overall project have been considered in an EIAR, and that neither project splitting nor its perception arises, wind energy development proposals must demonstrate that the effects on the environment of the whole project have been taken into account at the earliest possible stage in the technical planning and decision-making process and that issues arising from cumulative effects have been properly assessed.

The EIAR and planning application(s) for the substation and the grid connection must address the direct effects and any short, medium and long term, permanent and temporary, positive and negative, indirect, secondary cumulative and transboundary effects of the whole project, i.e. the wind energy development and the grid connection.

County Planning Policy

The windfarm site is located in the Killeshin Hills Landscape Character Area as set out in Appendix VII of the Carlow County Development Plan 2022-2028 in an 'Upland' landscape type with the highest landscape sensitivity rating. As identified in Section 3, the area is subject to a local land use policy wherein windfarm developments are not normally permissible in the upland areas.

Policy WE P4 of the Carlow County Development Plan 2022-2028 also refers;

WE P4: 'Wind farm development will not normally be permissible in the Uplands Landscape Type as shown in Figure 6 of the Carlow County Landscape Character Assessment included as Appendix VII to this Plan. This provision shall not apply to micro energy generation and community energy projects as provided for in Section 7.10.3.5, where deemed appropriate and subject to compliance with proper planning and environmental considerations.'

The principle of the development is contrary to the foregoing provisions of the Carlow County Development Plan 2022-2028 and associated Renewable Energy Strategy.

Notwithstanding, permission has been granted and as such any subsequent planning application for associated infrastructure will be assess on its own merits. In this regard the following is also noted;

- Section 7.10.3.1 of the Plan seeks to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources within County Carlow to be harnessed in a manner that is consistent with proper planning and sustainable development. The section further states that "Site suitability is an important factor in determining the suitability of wind farms, having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views and scenic routes, wildlife, habitats, designated sites, protected structures or bird migration paths, and compatibility with adjoining land uses. The Council is required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the County area to be harnessed in a manner that is consistent with proper planning and sustainable development".
- It is the policy of the Council under Climate Action and Energy Policy RE P1 to "Encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations".

Carlow County Renewable Energy Strategy 2021 (RES) Appendix 2b - VI.

The application site is located in the Killeshin Hills Landscape Character Area as set out in Appendix VII of the Carlow County Development Plan 2022-2028 in an 'Upland' landscape type with the highest landscape sensitivity rating.

Section 6.1 addresses wind energy which considers onshore wind in County Carlow, defining the resource and the associated energy conversion technologies, identifying potential development, and setting out policy and objectives to support wind energy developments, which can contribute to renewable energy targets, while minimising any adverse impact on the environment.

Landscape and Visual Impact Assessment

The assessment of landscape and visual impacts should take account of Carlow County Landscape Character Assessment and Schedule of Protected Views, included as Appendix VII to the Carlow County Development Plan 2022-2028. On the basis of the landscape character assessment and associated mapping, the site is located in an Uplands Landscape Character Type and has the highest sensitivity rating (5 on the matrix scale of 1-5) as identified in the Landscape Character Assessment of the Carlow County Development Plan 2022-2028 (Appendix VII), whereby the landscape has a moderate capacity to accommodate wind farm development.

Part of the application site is located in an elevated landscape known as the Castlecomer Plateau, which unlike other upland areas is an unbroken expanse of land where the cumulative impact may be more significant than in a more undulating area. Overall, the Planning Authority consider that there is a low capacity in the area to absorb wind turbines, overhead cables and masts, particularly in the upland areas and have concerns regarding the accumulative impact of the proposed development, in conjunction with the Bilboa Wind Farm c. 4.5km and Gortahile Wind Farm, c. 5.5km to the northeast.

The Carlow County Landscape Character Assessment also identifies a number of designated scenic views and routes in the rural area in which the proposed development will be located. These scenic views and routes should also inform the examination and assessment of visual impacts, as the proposed development has the potential to negatively impact on designated scenic views and routes. Of the protected views listed in Table 9.3 of the CDP, two are of particular importance with respect to the proposed development. These are listed below:

- View Point 31 Vista east, panorama across central plain to Blackstairs-Ridge Cross.
- ➤ View Point 32 Vista east, panorama from Killeshin Hills across central plain to Blackstairs-Tuolcreen Cross.

Map 9.5 of the CDP illustrates the designated scenic routes throughout County Carlow of particular relevance to the proposed development. Scenic Route 7: L3037-11, from Ridge Cross Roads, running north to the Butts Cross Roads, directly passes the main site entrance into the Wind Farm and has views across the Central Plain.

Scenic Route 6: L7123-0 at Ridge Crossroads, running northeast towards Seskinrea, also has views of the Central Plain and is less then 1km from the entrance to the subject Windfarm.

In addition, Scenic Route 8: L7130-26 at Tomard Wood, is in close proximity of the application site. The potential for the proposed development to impact negatively on these panoramic vistas needs to be assessed in detail. Combined visual impacts with existing wind farm developments in the area will also need to form part of this assessment. Views from individual residential properties in the area should be taken into account. The proposed siting and design must be able to demonstrate that the integrity of the landscape character area will be maintained.

Natural Heritage

The assessment of the existing and proposed development, in respect of the content of both EIA and Appropriate Assessment, needs to consider the following:

- ➤ The close proximity of the River Barrow and River Nore SAC to the proposed site. The project site is located in the catchment of the specified Freshwater Pearl Mussel (FPM) populations, which is the qualifying interest of the River Barrow and River Nore Special Area of Conservation (SAC). In addition, all of the surface waterbodies draining the grid connection route drain into the River Barrow and River Nore SAC and the River Nore SPA. Given the features of interest of the River Barrow and River Nore SAC, it is considered to be very sensitive to the effects of water quality deterioration; while a deterioration in water quality could also affect the Kingfisher which is present in the River Nore SPA.
- > Information should be provided regarding the protection of retained ecological features, in particular the protection of trees and hedgerows during on-site construction activities.
- > Consideration should be given to a tree replanting proposal to compensate for the loss of trees and to mitigate ecological impacts.

In relation to the Appropriate Assessment, you are advised to have regard to the following:

- Must clearly identify the European Sites potentially impacted by the proposed development and explain the basis on which these have been identified in a way that makes it clear that there is no scientific doubt that there could be adverse effects on the integrity of any other European Sites (ecological or hydrological corridors).
- Must clearly explain why each of the identified European sites have been designated.
- Must clearly identify the conservation objectives for each European site (by reference to NPWS published data).
- Must clearly set out all relevant and available data in relation to each qualifying interest, including all documentary sources available.
- Must set out all investigations and examinations that have been carried out.
- Must be apparent that regard has been had to the best scientific knowledge.
- Must contain a detailed analysis and evaluation of all available data with no lacunae or gaps.
- Must identify and analyse, in the light of the best scientific knowledge in the field, all aspects of the proposed development which can, by itself or in combination with other projects or plans, affect the European Sites in the light of its conservation objectives. That analysis should distinguish between temporary and permanent impacts and has to address the impacts on the flora, fauna and habitats for which the site was designated and the impacts on the conservation objectives for the site.
- Must identify mitigation measures which will reduce impacts on the European Site and specify precisely how they will be implemented and why they will be effective. There cannot be any scientific doubt about the effectiveness of the mitigation measures, and it will not be acceptable to say that these will be developed post-consent.
- Must contain clear, precise, and definitive findings as to what the residual impacts will be on the European Site.
- Complete project details, including a Construction Environmental Management Plan (CEMP), needs to be provided in order to allow an adequate appropriate assessment to be undertaken. It should be demonstrated that the CEMP and other such plans are adequate and effective mitigation, supported by scientific information and analysis, and that they are feasible within the physical constraints of the proposed site. The CEMP should also include methods to ensure invasive alien species are not introduced or spread.
- The positions, locations and sizes of construction infrastructure and mitigation, such as settlement ponds, disposal sites and construction compounds, may significantly affect European sites, designated sites, habitats, and species in their own right and could have an effect for example on drainage, water quality, habitat loss, and disturbance. If these are undetermined at time of the assessment, all potential effects of the development on the site are not being considered. If applicants are not in a position to decide the exact location and details of these at time of application, then they need to consider the range of options that may be used in their assessment so that all issues are covered.

Archaeological Heritage

There are no protected structures in close proximity to the proposed development site. There is one recorded monument circa. 80m south of the proposed access track serving the Wind Farm -RMP CW011-006: enclosure. The monument is recorded as a bank enclose a circular area measuring 16m in diameter (www.archaeology.ie). The site is recorded on the First Edition 1:10,560 Ordnance Survey map (1839), but is not shown on later edition cartographic sources.

Impacts on Residential Amenity and Adjoining Land Uses

- Potential impacts on residential properties and on existing adjoining land uses should be examined and assessed. Proximity to (inter alia) access roads, grid connection route, and other site infrastructure should be considered in detail.
- The assessment of impacts on residential amenity and other sensitive land uses in the area should be accompanied by accurate mapping of all such properties. This map should be of a scale that allows easy identification of these properties.

Noise, Vibration and Dust

- Suitably scaled mapping should be provided, which accurately identifies existing and proposed noise and dust monitoring stations relative to sensitive receptors.
- The assessment of noise impacts needs to consider noise generated from construction activities and operational noise e.g. including accumulation of noise impacts from the permitted wind farm, such as rotating turbine noise and blade swish noise.
- Noise associated with the construction of access roads and cable routes should be assessed and should include restrictions on the hours of operation to prevent noise nuisance at dwellings and other adjoining land uses/sensitive locations.

Flora and Fauna

The existing site and proposed site should be surveyed for invasive species and recommendations for control measures made as part of EIAR, and in an Invasive Species Management Plan.

Water Quality

Geological Survey and EPA mapping should be referred to regarding potential surface water and groundwater vulnerability in the area.

Surface Water Drainage

The majority of the grid connection route passes through the Gowran_010 and Nore_190 river waterbodies, which have been assigned a Moderate Status. The Fane_020 river water body, to which the replanting lands drains, has a Moderate Status. With respect to groundwater, the wind farm site and the northern section of the grid connection route are located in the Castlecomer GWB. Sections of the grid connection further south are mapped in the Shanragh GWB, the Ballingarry GWB and the Kilkenny GWB (IE_SE_G_078) before terminating in the Clifden GWB. The haul route works, and replanting lands are located in the Newtown GWB and Louth GWB respectively.

All GWBs in the area of the project as assigned 'Good Status', which is defined based on the quantitative status and chemistry.

A detailed survey of all existing and proposed on site drainage should be provided, clearly identifying where all on site water drains will discharge to and how drainage will be maintained. Detailed drainage design must be shown on the submitted plans.

Traffic and Transportation

The assessment of traffic and transportation issues should take account of the following:

- The provision of a traffic impact assessment for the construction phase.
- Details of the anticipated traffic types and volumes for the development should be provided and assessed, and broken down in daily, weekly, and monthly figures. Details should also include expected peak site traffic, day to day hours and duration.
- Potential traffic impacts from HGVs negotiating built up areas should be considered, as well as the feasibility of avoiding routing HGV traffic through such locations.
- Full design details for the entrance(s) to the substation site should be provided to demonstrate adequate turning movements for HGVs and sightlines. Accommodation works on third party lands must have written agreement of third-party landowners.
- Pre and Post construction condition survey of the roads involved in accordance with the "Pavement Survey Standard for Regional and Local Roads" should be carried out.
- Proposals to upgrade a road or structure where it is shown to be structurally unsuitable should be provided and where excessive damage to public road(s) is identified based on the Pre and Post surveys.

If you have any further queries please contact the undersigned at 059 91 36229 or planningdevman@carlowcoco.ie

Yours sincerely,

P.P. Shirley O'Neill

Administrative Officer.

Steph Smart

From: Moran, Susan <Susan.Moran@agriculture.gov.ie>

Sent: 25 March 2024 15:59

To: Steph Smart

Subject: FW: Pre-application Scoping Request

Good evening,
Please see below for information.
Kind Regards
Susan

From: EIA Screening <EIAscreening@agriculture.gov.ie>

Sent: Monday, March 25, 2024 3:56 PM

To: Moran, Susan <Susan.Moran@agriculture.gov.ie>

Subject: RE: Pre-application Scoping Request

Hi Susan,

The Department welcomes the opportunity to provide input to this application. It seems this activity does not fall within the remit of the EIA Regulations under DAFM and therefore, once relevant environmental and planning regulations are met, DAFM has no comment at this stage of the consultation process. However, there is a mention of drainage works and in this instance please be cognisant of the requirements of the EIA (Agriculture) Regulations.

Regards, Michael

From: Moran, Susan <<u>Susan.Moran@agriculture.gov.ie</u>>

Sent: Monday, March 25, 2024 12:31 PM

To: Environmental Impact Assessment < <u>xEIAScreening@agriculture.gov.ie</u>>

Subject: FW: Pre-application Scoping Request

Good afternoon,

Please forward any obs/comments you may have on the attached by Wednesday 25th April 2024

Regards

Susan Moran

From: Steph Smart < steph.smart@galetechenergy.com >

Sent: Monday, March 25, 2024 12:19 PM

To: Info < Info @ agriculture.gov.ie>; Environmental Co-ordination (Inbox) < Environmental Co-

ordination@agriculture.gov.ie>

Subject: Pre-application Scoping Request

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To whom it may concern,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

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www.galetechgroup.com



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Department of Agriculture, Food and the Marine

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scrios gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

Gaeltech Energy Services
Clondargan
Stradone
Co Cavan
H12NV06

1st May 2024

Re: Scoping Request for the proposed White Hill 110kV Electricity Substation & Underground Electricity Cables near Kilkenny City & Shankill in Co Carlow & Kilkenny

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 <u>before</u> trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section**, **Department of Agriculture**, **Food and the Marine**, **Johnstown Castle Estate**, **Co. Wexford**. Email: <u>felling.forestservice@agriculture.gov.ie</u> or Web <u>gov.ie - Tree Felling</u> Licences (www.gov.ie)

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

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

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

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

1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service);

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

It is important to note that when applying to a Local Authority, or An Bord Pleanàla, 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
- 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 Pleanàla, 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.
- 3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s)

	Yours	sincere	l۷.
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Johnstown Castle Co Wexford An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta Department of Housing, Local Government and Heritage



Your Ref: WHI001SS

Our Ref: G Pre00110/2024

(Please quote in all related correspondence)

24 April 2024

Steph Smart,
Galetech Energy Services,
Clondargan,
Stradone,
Co. Cavan,
Ireland

Via email: steph.smart@galetechenergy.com

Re: to develop grid connection infrastructure associated with the permitted White Hill Wind Farm within County Carlow and County Kilkenny

A chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

Archaeology

The Department has reviewed the 'Preliminary Environmental Impact Assessment Scoping Report' for the proposed White Hill Wind Farm Electricity Substation & Grid Connection.

The information provided was not sufficiently detailed to allow for a full assessment of the archaeological implications of this proposal, however it is noted that an Archaeological Impact Assessment is scoped into the proposed Environmental Impact Assessment (EIA) process; this must be carried out by a suitably qualified Consultant Archaeologist.

The Department advises that following are carried out as part of the Archaeological Impact Assessment:



- The planned desk-study must be supported by a field inspection regime and should inform (as appropriate):
 - Targeted non-intrusive advance geophysical survey or prospection (such as Ground Penetrating Radar Surveys)
 - o Targeted advance archaeological test excavation
 - Targeted underwater archaeology surveys or wade surveys
 - Targeted built heritage surveys

It is essential that the baseline archaeological and cultural heritage environment is fully defined and well-characterised.

 Any and all intrusive advance investigations (such as, but not limited to, ground investigations for soils/geology/hydrogeology) carried out as part of the EIA or design process should be subject to a programme of archaeological monitoring by a suitably qualified archaeologist.

The results of these investigations should form part of the EIA process and be incorporated within the EIA Report. The Department is happy to provide further advice and clarification as and if required in relation to the preparation of suitably comprehensive assessments as outlined above, with particular regard to the scope and locations for any advance non-intrusive prospection, advance test excavation, underwater archaeology surveys/wade surveys or built heritage surveys that would be appropriate to inform the assessment of this proposed scheme.

Further to the above, and by way of general archaeological advice, please note that, whilst the proposed development site (PDS) may or may not contain within it known or subsurface Recorded Monuments and/or Archaeological sites that may require assessment as part of the overall Cultural Heritage Impact Assessment (CHIA), the PDS itself is located within a wider area of known archaeological settlement and activity—see Record of Monuments and Places and the Historic Environment Viewer (available: www.archaeology.ie). All of these Recorded Monuments, both within and outside the PDS, are subject to statutory protection in the Record of Monuments and Places, established under section 12 of the National Monuments Act 1930-2014. Therefore the CHIA must include an assessment of the possible effects of the proposal on the wider archaeological landscape. It is of importance that the study area for the CHIA should be of sufficient size and extent to support this.



The Department would draw particular attention to the following Recorded Monument that forms the boundary to the proposed sub-station site:

KK016-006---- (Linear earthwork)

This monument is subject to statutory protection under Section 12 of the National Monuments (Amendment) Act 1930-2014.

Extensive advance archaeological investigations have been carried out in relation to recent developments in close proximity to the proposed development, notably along the route of the M9 motorway bordering the PDS to the east. This Department advises that these findings must be consulted and given adequate weight in the CHIA to aid in evaluating the likely effects of this proposed development to the archaeological and cultural heritage resource. There is a potential that previously unknown sub-surface archaeological sites or features may be present within the PDS. Advance prospection would be required to establish the extent of such features so that the potential likely impacts of the proposed development could be established.

Notwithstanding the above, this Department awaits the submission of this assessment before commenting further.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie.

Is mise, le meas

Edel Griffin

Development Applications Unit

Administration

Steph Smart

From: Customer Service < Customer.Service@tcaqsm.gov.ie>

Sent: 26 March 2024 10:21

To: Steph Smart

Cc: Manager.DAU@housing.gov.ie
Subject: RE: Pre-application Scoping Request

Hi Steph,

Thank you for contacting Customer Service in the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.

Planning matters in general fall within the remit of the Department of Housing, Local Government and Heritage. Please note that following the coming into force of the Planning and Development, Heritage and Broadcasting (Amendment) Act 2021 (Act 11 of 2021) all Heritage functions previously held by the Department of Culture, Heritage and the Gaeltacht are now held by that Department.

The Development Applications Unit may be contacted at Manager.DAU@housing.gov.ie.

Regards, Ryan

From: Steph Smart [mailto:steph.smart@galetechenergy.com]

Sent: Monday 25 March 2024 12:28

To: Customer Service < Customer. Service@tcagsm.gov.ie>

Subject: Pre-application Scoping Request

Rabhadh! Tháinig an teachtaireacht seo ó lasmuigh de TCAGSM. Bí cúramach le hipearnasc, le ceangaltáin agus le treoracha sa ríomhphost seo.

Caution! This message originated from outside of TCAGSM. Please treat hyperlinks, attachments and instructions in this email with caution.

Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | +353 (0)49 555 5050

Clondargan, Stradone, Co. Cavan, Ireland

www.galetechgroup.com



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Tá an t-eolas sa ríomhphost seo faoi rún, chomh maith le gach comhad atá ceangailte leis, agus i gcomhair úsáid an duine nó an chórais a bhfuil sé dírithe air amháin. Má fhaigheann tú an ríomhphost seo trí bhotún, cuir scéal chugainn ag webmaster@tcagsm.gov.ie. Tá an ríomhphost seo arna sheiceáil ag scanóir víreas agus dealramh air go bhfuil sé glan.

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Steph Smart

From: planning applications <planning.applications@failteireland.ie>

Sent: 16 April 2024 17:23 **To:** Steph Smart

Subject: RE: Pre-application Scoping Request **Attachments:** Fáilte Ireland EIAR Guidelines 2023.pdf

Hello Steph,

Thank you for your email and the pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny.

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

Regards,

Yvonne

Yvonne Jackson

Product Development-Environment & Planning Support | Fáilte Ireland

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



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From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Monday, March 25, 2024 12:42 PM

To: planning applications <planning.applications@failteireland.ie>

Subject: Pre-application Scoping Request

[ATTENTION] 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,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>

Clondargan, Stradone, Co. Cavan, Ireland

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EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects



July 2023

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1. Introduction

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

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

This guidance document has been prepared by Fáilte Ireland to update their EIA guidelines in line with changes in legislative and guidance requirements.

2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€9.5 billion**, and exchequer revenue of **€1.8 billion** in 2019, which helps fund other key public services.

In 2019 Ireland welcomed 9.7 million overseas visitors.

Fáilte Ireland is the National Tourism Development Authority established by the Irish Government in May 2003. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

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

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

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

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

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

3. Legislation and Statutory Guidance

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

Legislation

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

Statutory Guidance

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Guidelines on the information to be contained in Environmental Impact Assessment Reports in May 2022. The Guidelines are a statutory document to be regarded by those preparing EIARs and the decision makers considering the EIARs.

Some of the key changes to the EIA Directive introduced by Directive 2014/52/EU are as follows:

- Additional information to be provided in the project description to describe the location
 of the project, the technologies and substances used, the construction of the project
 and required demolition;
- The requirement for consideration of alternatives has changed from a requirement to
 provide 'An outline of the main alternatives studied by the developer and an indication
 of the main reasons for this choice, taking into account the environmental effects' to 'a
 description of the reasonable alternatives studied by the developer, which are relevant
 to the project and its specific characteristics, and an indication of the main reasons for
 the option chosen, taking into account the effects of the project on the environment';
- A refinement of the environmental factors to be considered in the assessment with an increased focus on resource efficiency, climate change, biodiversity and disaster prevention;
- Changes to Prescribed Environmental Factors with 'Land' being added, 'Human Beings' replaced by 'Population & Human Health' and 'Flora & Fauna' replaced by 'Biodiversity';

- The developer is required to have competent experts to prepare the EIAR and the Board is required to have access to sufficient expertise to assess the EIAR;
- Requirement for the incorporation of mitigation and monitoring measures in consents and ensuring that developers deliver these measures;
- The requirements for the assessment of cumulative effects with existing and/or approved projects, taking into account existing environmental issues to be considered; and
- Reasoned decisions made with regard to the EIA outcomes must be provided.

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

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

Screening

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

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which does not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

START is the development a type that requires an EIA? YES Is it of a type that equires a mandatory EIA? (See 3.2.3) YES NO NO Is it above the Specified Threshold? Prepare an Environmental Impact Assessment Report (See 3.2.3) YES Is it a type of project that could lead to effects? (See 3.2.4) and / or YES Prepare any senstive location? relevant consent NO (See 3.2.4) documentation and / or Could the effects be significant? (See 3.2.4)

Figure 1: EIAR Screening Process

(Taken from Fig 3.2 of the EPA Guidelines)

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

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

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

EIAR Scoping

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

4. Assessing Tourism

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

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

Projects which involve a tourism element

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

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

Projects which may have an impact upon tourism

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

According to the Fáilte Ireland Tourism Facts 2019 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- · History and Culture

Pace of Life

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

5. Guiding Principles of EIAR

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

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

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

6. Consideration of Competency and Qualifications

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

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

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

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

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

7. EIAR Requirements

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

- project description;
- assessment of alternatives considered;
- baseline assessment;
- assessment of effects;
- cumulative impact;
- interaction of impacts;
- mitigation & monitoring; and
- residual impacts

Project Description

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

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

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

Assessment of Alternatives

The assessment of the various reasonable alternatives is an important requirement of the EIA process.

Where tourism projects are location dependent the assessment of reasonable alternatives should consider alternative methods, layouts, technologies and mitigations, detail the key considerations culminating in the selection of the option/design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The EPA EIAR Guidelines indicate that it is generally sufficient to provide a broad description of each main alternatives and the key issues associated with each, showing how environmental considerations were taken into account in deciding on the selected option.

Baseline Assessment

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

For example, in a tourism context;

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

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

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or recognition of such significance should be included. Where possible the value of the contribution of such tourism assets and activities to the local economy should also be provided.

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

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

Impact Assessment

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

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism under the 'Population and Human Health' and / or 'Landscape' topics as suggested below.

Population and Human Health

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

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section. The EPA guidelines makes reference to amenity "...which may be relevant under 'Population and Human Health' and 'Landscape'".

Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impacts.

Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

The assessment should also consider current Government policy on nature conservation as outlined in the National Biodiversity Action Plan 2017-2021 (NBAP) (and subsequent iterations (Including draft NBAP recently open for public consultation, to cover 2023 to 2027) which also includes Ireland's vision for biodiversity below.

'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.'

Land, Soils and Geology

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

The impact upon Geotourism related to geoheritage within the natural environment, e.g., any impacts on UNESCO Global Geoparks, of which we currently have three on the island of Ireland; Copper Coast in Co. Waterford, Burren and Cliffs of Moher in Co. Clare, and Cuilcagh Lakelands in Cavan and Fermanagh should be considered (where applicable) in this section.

Indirect impacts such as material use for extensive landscaping and public realm should also be considered.

Water

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

Air Quality and Climate

Tourism impact upon air quality is dependent on the activity proposed and sensitivity of the location. If the tourism project includes a large increase in transportation services, collection of baseline air emission data is advised. Transportation emissions affect not only air quality, but also greenhouse gases. Changing climatic patterns due to climate change should be factored into this analysis.

Noise and Vibration

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

Material Assets; Traffic and Transport

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

avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

Cultural Heritage

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

Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor and given that national policy emphasis on the non-renewable nature of the archaeology and archaeological heritage, focus should be a presumption in favour of its preservation in-situ or where preservation in-situ is not the option chosen, there must be preservation by record (i.e. archaeological excavation and recording must take place) in line with statutory requirements.

Material Assets; Waste Management

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

Material Assets

Material assets outside of the material assets already referenced that should be considered are built services (utilities) and infrastructure. Tourism development should include impact assessment on built services (utilities) and infrastructure while non tourism related development should consider the effect on tourism, which should be considered.

Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

Major Accident and Natural Disaster

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

Interaction of Impacts

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

Cumulative Impact

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

Transboundary Impact

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

Mitigation & Monitoring

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

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

Reduce the exposure of sensitive resources to excessive environmental impact.

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

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

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

With regard to Monitoring, Article 8a of the EIA Directive requires that:

- 1. 'The decision to grant development consent shall incorporate at least the following information ...
- (b) any environmental conditions attached to the decision, a description of any features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment as well as, where appropriate, monitoring measures. ... 4 Member States shall ensure that the features of the project and/or measures envisaged to avoid, prevent or reduce and, if possible, offset significant adverse effects on the environment are implemented by the developer, and shall determine the procedures regarding the monitoring of significant adverse effects on the environment. The type of parameters to be monitored and the duration of the monitoring shall be proportionate to the nature, location and size of the project and the significance of its effects on the environment. Existing monitoring arrangements resulting from Union legislation other than this Directive and from national legislation may be used if appropriate, with a view to avoiding duplication of monitoring.

Residual Impacts

The residual impacts are the final predicted or intended impacts which occur after the proposed mitigation measures have been implemented.

8. Sources of information on Tourism

Information available online

Fáilte Ireland

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

Fáilte Ireland also manages an environmental surveying and monitoring database as part of the Wild Atlantic Way Operational Programme which can be accessed here. The purpose of this is to work with and demonstrate to our stakeholders and partners that we are committed to the sustainable development of the Wild Atlantic Way, and to be able to pre-empt and avoid environmental effects in the future should they occur.

Discover Ireland:

Operated by Fáilte Ireland, the Discover Ireland website includes comprehensive information on tourist attractions in destinations all around Ireland, including listings for activities, accommodation, events and experiences for every county, major town and region in Ireland. The website features elements from the four destination brands – Wild Atlantic Way, Ireland's Ancient East, Ireland's Hidden Heartlands and Visit Dublin and can be accessed here.

Tourism Ireland

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

Local Authorities

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

Regional Assemblies

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

Central Statistics Office

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

Steph Smart

From: DECC GSI Planning <GSIPlanning@GSl.ie>

Sent: 22 April 2024 12:45 **To:** Steph Smart

Cc: DECC GSI Planning; DECC Planning Advisory

Subject: RE: EIS 24/102 - Proposed 110kV Electricity Substation in Counties Carlow and

Kilkenny

Attachments: 24_102 Substation Cos Carlow Kilkenny.pdf; GSI datasets relevant to EIA & SEA_

20210421.pdf

Dear Steph,

With reference to your letter received on the 25 March 2024, concerning the Pre-Application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny, please find attached response and dataset sheet from Geological Survey Ireland.

Yours sincerely, Trish Smullen



Trish Smullen Geoheritage & Planning.

A division of the Department of the Environment, Climate and Communications.

From: DECC GSI Planning <GSIPlanning@GSI.ie>

Sent: Monday, March 25, 2024 4:40 PM

To: Patricia Smullen (DECC) <Trish.Smullen@gsi.ie> **Cc:** DECC GSI Planning <GSIPlanning@GSI.ie>

Subject: EIS 24/102 - Proposed 110kV Electricity Substation in Counties Carlow and Kilkenny

EIS 24/102

Pre-Application Scoping Request for a proposed 110kV Electricity Substation & underground cables in County Carlow & County Kilkenny. Request for observations by Galetech Energy Services by 26 April 2024. Letter with report is enclosed.

Regards,

John

From: Steph Smart < steph.smart@galetechenergy.com>

Sent: Monday 25 March 2024 12:45

To: DECC GSI Planning < <u>GSIPlanning@GSI.ie</u>> **Subject:** Pre-application Scoping Request

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

Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>

Clondargan, Stradone, Co. Cavan, Ireland

www.galetechgroup.com



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Steph Smart **Galetech Energy Services** Clondargan Stradone Co. Cavan

22 April 2024

Re: Pre-Application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in **County Carlow & County Kilkenny**

Your Ref: WHI001SS Our Ref: 24/102

Dear Steph,

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 gather various data for that purpose. Please see our website for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data is made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases this data is a baseline or starting point for further site specific assessments.

With reference to your letter received on the 25 March 2024, concerning the Pre-Application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

Geoheritage

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

The audits for Co. Carlow and Co. Kilkenny were published in 2004 and 2012 respectively. The full report details can be found here and here. Our records show that there are no CGSs in the vicinity of the proposed Electricity Substation & **Underground Electricity Cables route options.**

Groundwater

Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.





The Groundwater Data Viewer indicates aguifers classed as a 'Locally Important Aguifer - Bedrock which is Generally Moderately Productive', a 'Poor Aquifer - Bedrock which is Generally Unproductive', a 'Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones' and a 'Regionally Important Aquifer - Karstified (diffuse)' underlies the proposed Electricity Substation & Underground Electricity Cables route options.

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

Our records show that there are groundwater drinking water abstractions (Paulstown Public Water Supply (PWS) and Castlewarren Group Water Scheme (GWS)) with zones of contribution/source within the grid connection route options. Key to groundwater protection in general, and protection of specific drinking water supplies, is preventing ingress of runoff to the aquifer. Design of drainage will need to be cognisant of the public water schemes and the interactions between surface water and groundwater as well as run-off. Appropriate design should be undertaken by qualified and competent persons to include mitigation measures as necessary, such as SUDs or other drainage mitigation measures.

Any excavation/cuttings required for realignment should ensure that groundwater flow within the zones of contribution to the groundwater abstraction points is not disrupted, resulting in diminished yields. Note that there could be other groundwater abstractions in the locality for which Geological Survey Ireland has not undertaken studies, and a robust assessment should be undertaken by qualified and competent persons including a survey of all current wells and water abstractions within the vicinity.

Given the nearby drinking water sources (Public Water Scheme and Group Water Scheme), the effects of any potential contamination as a result of the project would need to be assessed.

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

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

Geological Mapping

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

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

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.

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

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

Natural Resources (Minerals/Aggregates)

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

We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. 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 development are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.

Geochemistry of soils, surface waters and sediments

Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and lithogeochemistry (rock geochemistry) from southeast Ireland datasets.

Geophysical data

Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gammaray radiation) of soils & rocks as part of the <u>Tellus programme</u>. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk. investigation works for large scale projects.

Guidelines

The following guidelines may also be of assistance:

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

Other comments

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

I hope that these comments are of assistance, and if we can be of any further help, please do not hesitate to the Geological





Survey Ireland Planning Team at GSIPlanning@gsi.ie.

Yours sincerely,

Geoheritage and Planning Programme

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





Geological Survey Ireland's Publicly Available Datasets Relevant to Planning, EIA and SEA processes following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018)

Geological Survey Ireland				n	
Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes / Limitations	Link to Geological Survey Ireland map viewer
				Associated guidance documentation relating to the National Landslide	
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Susceptibility Map is also available.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c
				Provide information of historic flooding, both surface water and	
				groundwater. [A lack of flooding presented in any specific location of the	
				map only indicates that a flood has not been detected. It does not	
				indicate that a flood cannot occur in that location at present or in the	
Geohazards	Groundwater Flooding (Historic)	Water	Regional	future]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
				Provides information on the probability of future karst groundwater	
				flooding (where available). [The maps do not, and are not intended to,	
				constitute advice. Professional or specialist advice should be sought	
				before taking, or refraining from, any action on the basis of the flood	
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	maps]	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc
Geohazards	Radon Map	Land & Soils/Air	National		http://www.epa.ie/radiation/radonmap/
				All geological heritage sites identified by Geological Survey Ireland are	
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plan	Land & Soils/Landscape	Regional	categorised as CGS pending any further NHA designation by NPWS.	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7ee1b6ab8d5&scale=0
				Broad-scale physical landscape units mapped at 1:100,000 scale in order	
Geological Mapping	Physiographic units:	Land & Soils	National	to be represented as a cartographic digital map at 1:250,000 scale	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420fc54877843aca1bc075c62b
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	includes 3D models	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b79416093b6b2212a850ce6&scale=0
				Digitised geotechnical and Site Investigation Reports and boreholes which	
Geological Mapping	Geotechnical database	Land & Soils	National	can be accessed through online downloads	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	land & Soils/Water	National	available online	https://secure.dccae.gov.ie/goldmine/index.html
					L
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale Data limited to 1:40,000 scale; sites should be investigated at local scale;	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Groundwater recharge.	Water	National		https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Groundwater recharge.	water	National	long term annual average recharge	https://dcenr.maps.arcgis.com/apps/webappviewer/index.ntmi?id=7e8a202301594087ab14629a10b748er
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	https://dcenr.maps.arcgis.com/apps/webappyiewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Groundwater vulnerability.	water	INGLIOITAL	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for	Intus://ucemi.maps.arcgis.com/apps/webappwiewer/intex.intim:ru=/eoazuz30133406/a014023a100/40ef
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	private supplies.	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Group scriente and public supply source protection areas.	water	INGLIGITAL	Data is limited to scale of 1:40.000. Data does not include all of the source	Inters.//ducini.niaps.aregis.com/apps/webappviewer/index.numrid=7e6a202301334067a014023a100740er
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	protections areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Catchment and WFD management units.	Water	National	protections areas	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geotherman	Catchinent and WFD management units.	water	Ivational	For areas underlain by limestone, includes karst features, tracer test	inteps://ducini.nnaps.arcgis.com/apps/webappviewer/index.intmirid=/edd202301334007a047a047a067
Groundwater & Geothermal	karst specific data layers	water	National	database; turlough water levels (gwlevel.ie).	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef
a. aawater a ocothermal	··				
ĺ				Not exhaustive; only those in designated SACs; could be other GWDTEs;	https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	for more information contact NPWS / EPA / site investigations	ireland-groundwater/Pages/Groundwater-bodies.aspx
a. aawater a ocothermal				Also, Roadmap for a Policy and Regulatory Framework for Geothermal	
Groundwater & Geothermal	Geothermal Suitability maps	land & Soils/Water	National	Energy, November 2020	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9ee46bee08de41278b90a991d60c0b9e
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's		National	VII	https://secure.dccae.gov.ie/GSI/INFOMAR_VIEWER/
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headla		Regional		http://www.cherishproject.eu/en/
	Or project (amount) records and record failures and record failures and records	***	.5	Currently the project is being carried out on the east coast and will be	https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water /Land & Soils	Regional	rolled out nationally	Index.aspx
	, and and	,	.5	Consideration of mineral resources and potential resources as a material	
				asset which should be explicitly recognised within the environmental	
Minerals	Aggregate potential	Land & Soils/Material Assets	National	assessment process	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
	Active quarries	Land & Soils	National	annual property	https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956
	One of the other ot				
				Inventory and Risk Classification 2009. Environmental Protection Agency,	https://gis.epa.ie/EPAMaps/default?easting=?&northing=?&lid=EPA:LEMA Facilities Extractive Facilities
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Economic Minerals Division and Geological Survey Ireland (DECC).	https://www.epa.ie/enforcement/mines/
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707ff72f754
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707ff72f754
Tellus		Land & Soils	Regional	A THOUGHAIN MAPPING PROGRAMMIC	https://dcenr.maps.arcgis.com/apps/mapseries/index.html?appid=0304e122b733498b99642707ff72f754
101103	aroun Securionist i mapping (public source project),	Luna & 30113	перина		

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

Version No. 1 Geological Survey Ireland April 2021



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

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

Gaeltech Energy Services Clondargan, Stradone, Co. Cavan, Ireland

Our Ref: 4373, sent via email to steph.smart@galetechenergy.com

22/03/2024

Re Pre-application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny, & your letter of 25/03/2024

To whom it may concern,

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

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

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

If you have any queries please contact the undersigned.

Yours sincerely

Geoff Hynes

Inspector,

COMAH, Chemical Production & Storage (CCPS)



www.hse.ie @hselive

t 059 91 36574 t 056 77 84016



Ospidéal Naomh Dympna Bóthar Bhaile Átha Í Ceatharlach R93 DE62 Ospidéal Naomh Canice Bóthar Bhaile Átha Cliath Cill Chainnigh R95 P231 Saint Dympna's Hospital Athy Road Carlow R93 DE62 Saint Canice's Hospital Dublin Road Kilkenny R95 P231

Galetech Energy Services Clondargan Stradone Co Cavan

26 April 2024

Your Ref: WHI001SS

Applicant: White Hill Wind Limited

Proposal: Proposed 110kV Electricity Substation and Underground Electricity Cables associated with the permitted White Hill Wind Farm in Co Carlow and Co Kilkenny

Dear Sir/Madam,

The HSE Environmental Health Consultation report regarding the above application is attached below. The following HSE departments were made aware of the consultation request for the proposed development on 2 April 2024.

- HSE Estates Helen Maher/Stephen Murphy
- Emergency Planning David O'Sullivan
- Director of National Health Protection Eamonn O'Moore/Ina Kelly
- CHO Kate Killeen White

All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate. No additional investigations or measurements were undertaken. This report only refers to those sections of the documents which are relevant to the HSE.

If you have any queries regarding the report, please contact me.

Yours Sincerely,

Principal Environmental Health Officer

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Ospidéal Naomh Dympna Bóthar Bhaile Átha Í Ceatharlach R93 DE62

Ospidéal Naomh Canice Bóthar Bhaile Átha Cliath Cill Chainnigh R95 P231 Saint Dympna's Hospital Athy Road Carlow R93 DE62 Saint Canice's Hospital Dublin Road Kilkenny R95 P231

t 059 91 36574 t 056 77 84016

26 April 2024

EHIS Reference No. 3838

HSE EIA SCOPING

Environmental Health Service Consultation Report

Type of consultation: EIA Scoping

Report to: Galetech Energy Services, Clondargan, Stradone, Co Cavan

Applicant: White Hill Wind Limited

Proposal: Proposed 110kV Electricity Substation and Underground Electricity Cables associated with the permitted White Hill Wind Farm in Co Carlow and Co Kilkenny

Introduction

This report only comments on Environmental Health impacts of the proposed development. The Environmental Health Service (EHS) has made observations and submissions on the following specific environmental health areas.

Description of proposed development

The applicant intends to develop grid connection infrastructure associated with the permitted White Hill Wind Farm, the proposed development will include a 110KV substation at Shankill, Co Kilkenny. The applicant outlines that 2 route options for 8.5km of underground electricity cables are being considered at present. Details of the project are outlined in the preliminary Environmental Impact Assessment Scoping Report together with a brief description of environmental effects.

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 EIAR, 2022, www.epa.ie.
- 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 new guidelines were published by the EPA on 17 May 2022 and can be found on the EPA website. https://www.epa.ie/publications/monitoring--assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php

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



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- 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. The impacts on human health must be fully assessed in the EIAR, it is recommended that the wider determinants of health and wellbeing are considered. 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 Environmental Health Service (EHS) recommends that the following matters are included and assessed in the EIAR:

- Public Consultation
- Population and Human Health
- Water (Hydrology and Hydrogeology)
- Land, Soils and Geology
- Air Quality, Dust and Odour
- Climate Change and Opportunity for Health Gain
- Noise and Vibration
- Waste Management

The EIAR should identify the nearest sensitive receptors and consider the impact of the existing and proposed development on them. Sensitive receptors include but are not limited to:

- Occupied houses
- Farms
- Schools
- Childcare facilities
- Medical facilities and nursing homes
- Sports and community facilities and
- Food premises.

Public Consultation

Whilst it is acknowledged that the proposed substation and grid connection route are located in a predominantly rural area, it is recommended that early and meaningful public consultation should be carried out. The local community must be fully informed of what the proposed development entails and should be given sufficient opportunities to express their views on the proposed development.

Sensitive receptors and other stake-holders should be identified to ensure all necessary and appropriate mitigation measures are put in place to avoid any complaints about the proposed Quarry development in the future.

The applicant should consider the appointment of a community liaison officer and the development of a dedicated website for the project. All correspondence, maps, project updates and documentation including EIAR should be uploaded to the website.

Construction and site operation times should be considered as part of the consultation process with local residents.

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 EIAR.

The EIAR should include proposals for dealing with complaints from members of the public should they arise.



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Construction

A construction and environmental management plan (CEMP) should be provided with the EIAR. This should comprehensively outline working procedures and any necessary mitigation measures that will be provided. The impact of construction work (noise, dust, potential rodent issues, any disturbance to water supplies, impacts on access to homes and businesses during the works) along with the impact of increased construction traffic on residents in the vicinity should be assessed in the EIAR. Mitigation and traffic management measures should be outlined.

Noise and Vibration

The potential impacts for noise and vibration from the construction and operation of the proposed development on all noise sensitive locations must be clearly identified in the EIAR. The EIAR must also consider the appropriateness and effectiveness of all proposed mitigation measures to minimise noise and vibration. A baseline noise monitoring survey should be undertaken to establish the existing background noise levels. Noise from any existing industry/quarries or any potential sources in the area should not be included as part of the back ground levels.

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

Details of the location and frequency of noise monitoring for the proposed development should be included in the EIA to be submitted as part of the Planning Application.

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 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 in addition to any private wells supplying potable water to houses in the vicinity of the proposed development. Measures to ensure that all sources and supplies are protected should be described.



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Saint Dympna's Hospital Carlow R93 DE62

Saint Canice's Hospital **Dublin Road** Kilkenny R95 P231

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.

Ancillary Facilities

The EIAR should include details of the location of the site office, construction compound, fuel storage depot, wheel washing, sanitary accommodation and canteen, Proposals for the sanitary disposal of wastewater and the provision of a potable water supply to the site canteen should be included.

Cumulative Impacts

All existing or proposed Quarries/industry or developments/housing in the vicinity should be clearly identified in the EIAR. The impact on sensitive receptors of the proposed development combined with any other developments in the vicinity should be considered. The EIAR should include a detailed assessment of any likely significant cumulative impacts of the proposed development.

Carmel Lynch

Environmental Health Officer

Carmo Dogod

Environment and Climate Change Network Support Unit





HSE South Emergency Management Consultation Report							
Report to	Report to Robbie Doyle, PEHO, Carlow/Kilkenny					2 nd April, 2024	
Type of consultation: EIS Scoping X Screening EIAR EPA Other (please specify): Pre-application Scoping request at Shankill, Co. Kilkenny							
Authorities		Carlow / Kilkenny County Council					
Reference No.		WH1001SS EHIS Ref No. 3838					
EM Reference	Number	EMENV 194					
Applicant		White Hill Wind Farm Limited - Galetech Energy Services, Clondargan, Stradone, Co. Cavan					
Proposal for Consideration		Proposed 100kV Substation & 8.5km of Underground Electricity Cables in County Carlow & County Kilkenny					

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 maryanne.horgan@hse.ie

Steph Smart

From: Cormac Goulding <Cormac.Goulding@fisheriesireland.ie>

Sent: 18 April 2024 14:53 **To:** Steph Smart

Cc: Donnachadh Byrne; Oliver McGrath
Subject: FW: Pre-application Scoping Request

Attachments: IFI_Response_Galetech.pdf

Hi Steph,

Please find attached a response from Inland Fisheries Ireland to your request below. Please feel free to contact us should require any clarification or further information.

Regards,

Cormac

Cormac Goulding Fisheries Environmental Officer

Cormac.Goulding@fisheriesireland.ie • 🌣 +353 (0)52 6180 055 • 🏶 www.fisheriesireland.ie • 🏚 E91 RD25



Help us protect Ireland's rivers, lakes and coastlines by reporting illegal fishing, water pollution or invasive specie.

Our confidential phone number is 0818 34 74 24, which is open 24 hours a day / 7 days a week.

To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

From: Susan Sayers <Susan.Sayers@fisheriesireland.ie>

Sent: Monday, March 25, 2024 3:19 PM

To: Cormac Goulding < Cormac. Goulding@fisheriesireland.ie >

Subject: Fw: Pre-application Scoping Request

Hi Cormac,

Please see below and attached.

Thanks, Susan

Susan Sayers

Adminstrative Assistant

Susan.Sayers@fisheriesireland.ie • 🖟 0871494030 • 🌣 052 6170072 • 🚳 www.fisheriesireland.ie • 👚 E91 RD25





At Inland Fisheries Ireland, we work flexibly. I'm sending this message now because it suits my work hours. I don't expect that you will rea message outside of usual hours. If you have any concerns or feel overwhelmed or need further support please consider visiting our Emp Spectrum.Life which can offer you or your family support on any personal or work related issues.

To read our Privacy Policy and Email Disclaimer Notice, Please visit www.fisheriesireland.ie

From: info < info@fisheriesireland.ie>

Sent: 25 March 2024 14:59

To: Clonmel Info < <u>Clonmel@fisheriesireland.ie</u>> **Subject:** FW: Pre-application Scoping Request

Good afternoon Ladies Below email received to Citywest Info Kind regards Yvonne

From: Steph Smart < steph.smart@galetechenergy.com >

Sent: Monday, March 25, 2024 2:12 PM

To: info <info@fisheriesireland.ie>
Subject: Pro application Seeping Regues

Subject: Pre-application Scoping Request

Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

- steph.smart@galetechenergy.com
- **(%)** +44 (0)7725710754 | +353 (0)49 555 5050
- (9) Clondargan, Stradone, Co. Cavan, Ireland
- www.galetechgroup.com



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Ms. Steph Smart, Graduate Planner, Galetech Energy Services Clondargan, Stradone, Co. Cayan

18 April 2024

Re: Pre-Application Scoping Request for a proposed 110kV Electricity Substation &

Underground Electricity Cables in County Carlow & County Kilkenny

Location: White Hill Wind Farm to Substation at Shankill, Co. Kilkenny

Via Email to: steph.smart@galetechenergy.com

Dear Ms. Smart,

Inland Fisheries Ireland (IFI) is the statutory authority tasked under section 7(1) of the Inland Fisheries Act 2010 (No. 10 of 2010) with responsibility for the protection, management, and conservation of the inland fisheries resource. In respect of the proposed substation and underground grid connection, IFI wish to make the following observations:

The proposed route is located predominantly in the catchment areas of the surface water bodies listed below. All have direct hydrological connections with the Barrow – Nore SAC.

Surface Water Body	Ecological Status	Risk Status	
Monefelim_010	High	Not at Risk	
Monefelim_030	Moderate	At Risk	
Old_Leighlin Stream_010	Good	Not at Risk	
Moanmore_010	Good	Not at Risk	

Article 5 of the Surface Water Regulations (SI 272 of 2009) states that there should be no deterioration in Ecological Status of surface water bodies. Article 28 (2) of the Regulations states that a surface water body whose status is determined to be less than Good shall be restored to at least Good status. The proposed surveys / reports must demonstrate how this project would cause no deterioration to the above surface water bodies and is consistent with their restoration or maintenance at *Good Ecological Status* or better.

IFI requests that the following assessments be provided:

- Baseline ecological assessments of water courses potentially affected by the proposed development, including fish species as well as other biological and physico-chemical surveys
- Maps of all aquatic habitats potentially affected by the project, including all drainage channels (temporary and permanent) potentially impacted by the proposed development



- An assessment of the potential adverse effects of the proposed works on all relevant aquatic receptors, including fish. Assessments should cover area of the proposed development and the potential upstream and downstream impacts
- An assessment of the cumulative effects of the proposed development along with other existing or approved projects
- An assessment of the impact on the conservation objectives of species listed as qualifying interests in the Barrow Nore SAC, which includes Lamprey species and Atlantic Salmon
- The proposed mitigation measures to prevent erosion from soil disturbance in excavation areas and areas where there is significant movement of plant and machinery

Among the sources which may be used for fish ecological status and data are the Water Framework Directive Fish Ecological Status 2008-2021 fish survey results http://wfdfish.ie/ and https://opendata-ifigis.hub.arcgis.com/datasets/IFIgis::water-framework-directive-fish-ecological-status-2008-2021. This layer shows WFD fish ecological status for river site locations from 2008 to 2021. Fish species present at each site is also indicated. Galetech may also complete a data request form for specific fish survey data from our research department if required.

During the construction and operational phases, the applicant should adhere to the recommendations and guidelines outlined in IFI's *Guidelines on Protection of Fisheries during Construction Works in and adjacent to Waters* 2016. A copy of this document is available here.

Existing watercourse crossings for the proposed grid connection route should be utilised where possible. Crossings must be accompanied by a site-specific method statement provided to IFI. The applicant should provide these at least ten working days before works commence. Written approval from IFI should be obtained before works proceed.

Where existing crossings must undergo alteration, IFI request that these are upgraded in the interests of habitat improvement and biodiversity enhancement. Crossings should be designed to meet IFI's *Fisheries Construction Guidelines* referred to above. IFI should be consulted at the design phase to maximise favourable outcomes for fisheries habitats.

The storage, management and conveyance of materials must not permit any deleterious matter to reach surface water systems either directly or indirectly. Watercourses must be maintained in their original state, their bankside vegetation preserved, and the existing line of the watercourse left unaltered. There should be no interference with the bed, gradient, profile or alignment of watercourses without the prior notification and the agreement of Inland Fisheries Ireland. Instream works may only take place during the period 1 July to 30 September.

SuDS principles should be incorporated into surface water management plans to attenuate any run-off of suspended solids or other deleterious matter. Natural flow paths should not be interrupted or diverted in a manner that would increase the risk of erosion. Drainage infrastructure should be installed during dry ground conditions.



Before works commence the applicant or the appointed contractor should appoint a suitably qualified person to oversee and implement environmental mitigation measures. Contact details should be provided to Inland Fisheries Ireland. In the event of an environmental incident which threatens an aquatic zone IFI must be informed immediately at the contact details below.

At all times the precautionary principle should be applied throughout the development. Records should be kept of biological and chemical monitoring undertaken before and during the construction phase and operational phase for the development. Records should also be kept of inspections of surface water mitigation measures. These records should be made available upon request to any authorised person as defined under the Local Government (Water Pollution) Acts.

Future correspondence or any requests for clarification can be sent via email to cormac.goulding@fisheriesireland.ie or by post to the address below.

Yours sincerely,

Cormac Goulding

Fisheries Environmental Officer South-Eastern River Basin District

CC: Donnachadh Byrne, Senior Fisheries Environmental Officer, SERBD Oliver McGrath, Fisheries Environmental Officer, SERBD



Uisce Éireann Ref: PN24000002217

Uisce Éireann Bosca OP 6000 Baile Átha Cliath 1 D01 WA07 Éire

Galetech Energy steph.smart@galetechenergy.com

Uisce Éireann PO Box 6000 Dublin 1 D01 WA07 Ireland

Issue Date: 3 May 2024

T: +353 1 89 25000 F: +353 1 89 25001 www.water.ie

Re: EIA Scoping Request – Proposed electricity substation and associated underground cabling at Shankill Co. Kilkenny

A Chara,

Uisce Éireann has received notification of your Environmental Impact Assessment (EIA) scoping request relating to the White Hill Wind Farm Electricity Substation and Grid Connection.

Based on the documentation submitted it does not appear that there are any Uisce Eireann assets in the vicinity of the proposed substation or cabling routes.

It is noted that there is a privately owned water infrastructure in close proximity to the proposed cabling to the west of Baunreagh at the entrance to the wind farm.

There is an existing Uisce Éireann abstraction point to the west downstream from the proposed cabling works in Bagnalstown. The EIAR must include and consider all direct, indirect and cumulative effects on the abstraction point.

Additional advice is provided at Appendix 1. On receipt of the planning referral, Uisce Éireann will review the finalised Environmental Impact Assessment Report (EIAR) as part of the planning process.

Queries relating to the terms and observations above should be directed to planning@water.ie

PP Ali Robinson

Signed on behalf of Dermot Phelan Connections and Developer Services

APPENDIX 1

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
- 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.
- I) 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
- 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.



Steph Smart

From: IWT Info <info@iwt.ie>
Sent: 02 April 2024 11:29
To: Steph Smart

Subject: Re: Pre-application Scoping Request

Dear Steph,

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

Kind regards, Fabiola Vieira

On Mon, 25 Mar 2024 at 14:18, Steph Smart < steph.smart@galetechenergy.com > wrote:

Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>

Clondargan, Stradone, Co. Cavan, Ireland

www.galetechgroup.com



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Irish Wildlife Trust, 8 Cabra Road, Dublin 7, D07T1W2

Registered Charity (CRA) Number: 20010966

Facebook: IrishWildlifeTrust Twitter: @irishwildlife

Phone: 01 445 7259 (landline available Wednesday-Thursday 9:30 to 5pm)

Steph Smart

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 26th March please see as follows.

The applicant is advised of the opinion of Kilkenny County Council in response to Scoping Document received on 26th 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
- 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.
- I) 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

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 gric 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 Pleanala 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 in 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 <u>to</u> 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

www.kilkennycoco.ie

Steph Smart

From: Sarah Roche <Sarah.Roche@opw.ie>

Sent: 24 April 2024 11:52 **To:** Steph Smart

Subject: RE: Pre-application Scoping Request Kilkenny Co.Co.

Attachments: OPW_reply re Section 50.docx

Good Morning,

I hope this email finds you well,

Your email has been reviewed by an OPW East Regional Engineer, please find attached comments in relation to preapplication scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny.

Kind regards, Sarah

Sarah Roche

Flood Projects Management

Oifig na nOibreacha Poiblí

Office of Public Works

Sráid Jonathan Swift, Baile Átha Troim, Co na Mí, C15 NX36

Jonathan Swift Street, Trim, Co Meath, C15 NX36

T (046) 942 2555 https://gov.ie/opw

To send me files larger than 30MB, please use the link below https://filetransfer.opw.ie/filedrop/sarah.roche@opw.ie

Email Disclaimer: https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/

Sarah Roche

Flood Projects Management

Oifig na nOibreacha Poiblí

Office of Public Works

Sráid Jonathan Swift, Baile Átha Troim, Co na Mí, C15 NX36

Jonathan Swift Street, Trim, Co Meath, C15 NX36

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Galetech Energy Services Cavan Clondargan, Stradone, Co. Cavan, Ireland.

Pre-Application Scoping Request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny

Dear Sir/Madam,

If it is proposed to construct any new bridge (or other structure such as a culvert or pipework etc.) or alter, reconstruct, or restore any existing bridge (or other structure such as a culvert or pipework etc.) over any watercourse as part of the development then these require prior consent from the Commissioners of Public Works under Section 50 of the Arterial Drainage Act of 1945 as amended.

A grant of 'Permission' for the planning application for a development which contains bridges or culverts etc., or modifications to same, does not confer Section 50 consent on the applicant, nor does it absolve the applicant from the requirement to obtain such consent from the Commissioners.

Where there is the potential for watercourse damming with flume pipes and/or diversion channels to facilitate the construction works, note that damming of a watercourse may be subject to consent under Section 47 of the Arterial Drainage Act of 1945 as amended, and the temporary pipes, culverts, and/or bridges required to cross or divert a watercourse during the construction phase will also require Section 50 consent. Further consultation is required with the Commissioners when the construction methodologies for the proposed works are finalised.

Please note that, in the context of seeking consent under Section 50 of the Arterial Drainage Act of 1945 as amended, the current required design standard for bridges or culverts is based on the flood with an annual exceedance probability of 1% (often referred to as the 1 in 100 year flood), increased by 20% to cater for the effects of climate change. Bridges or culverts are required to be able to convey this design flood without significantly altering the hydraulic characteristics of the watercourse. Further guidance is available on the following website: https://www.gov.ie/en/publication/957aa7-consent-requirements-constructionalteration-of-watercourse-infrastru/

Yours sincerely,

The Office of Public Works

From: Matthew Craig <matthew.craig@2rn.ie>

Sent: 27 March 2024 10:52

To: Steph Smart

Cc: windfarms@rte.ie; Johnny Evans

Subject: RE: Pre-application Scoping Request

Hi Steph,

2rn has no fixed linking that will be affected by the proposed Substation.

If the adjacent windfarm does go ahead to feed it, we would appreciate it if the substation could be included in the protocol, just in case there is interference to the broadcast services of local residents.

Regards

Matthew Craig

Project Engineer
Projects and Coverage Planning
2RN

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

D24 WK28

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

From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Monday, March 25, 2024 3:19 PM

To: windfarms@rte.ie; Matthew Craig <matthew.craig@2rn.ie>; Johnny Evans <johnny.evans@2rn.ie>

Subject: Pre-application Scoping Request

[CAUTION: 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]

To whom it may concern,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>

Clondargan, Stradone, Co. Cavan, Ireland

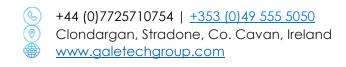
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Tom Barry <tom.barry@motorolasolutions.com> From: 17 June 2024 07:28 Sent: To: Steph Smart Subject: Fwd: Pre-application Scoping Request **Attachments:** WHI001SS F0608010601 Tetra Rev01.pdf Steph, We anticipate no impact from the development as proposed. Regards, Tom ----- Forwarded message -----From: Tetraireland Info < tetraireland.info@motorolasolutions.com > Date: Tue, Mar 26, 2024 at 6:23 AM Subject: Fwd: Pre-application Scoping Request To: Tom Barry < tom.barry@motorolasolutions.com > ----- Forwarded message -----From: Steph Smart < steph.smart@galetechenergy.com > Date: Mon, Mar 25, 2024 at 3:56 PM Subject: Pre-application Scoping Request To: tetraireland.info@motorolasolutions.com < tetraireland.info@motorolasolutions.com > Dear Sir/Madam, Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached. Kind regards, Steph Steph Smart | Graduate Planner | Galetech Energy Services





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From: Monika Biniaszewska < Monika.Biniaszewska@three.ie>

Sent: 26 March 2024 10:03

To: Steph Smart

Cc: Ross Murray; Sean Kelly; David Montgomery

Subject: RE: Pre-application Scoping Request

Hi Steph,

no issue to this proposed 110 kV Electricity Substation in County Carlow & County Kilkenny.





Thanks Monika

From: Ross Murray <Ross.Murray@three.ie> Sent: Tuesday, March 26, 2024 8:46 AM

To: Sean Kelly <Sean.Kelly2@three.ie>; David Montgomery <David.Montgomery@three.ie>; Monika Biniaszewska

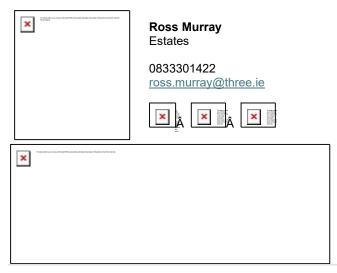
<Monika.Biniaszewska@three.ie>

Subject: FW: Pre-application Scoping Request

Please find attached for checking

Many thanks

Ross



From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Monday, March 25, 2024 3:58 PM

To: windfarmsdg@three.ie; DL Estates ROI < Estates@three.ie>

Subject: Pre-application Scoping Request

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To whom it may concern,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com



+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>



Clondargan, Stradone, Co. Cavan, Ireland





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Three Ireland

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From: INFO <Information@tii.ie>
Sent: 17 April 2024 09:54

To: Steph Smart

Subject: TII24-126693 - Pre-application Scoping Request -110kV Electricity Substation &

Underground Electricity Cables in County Carlow & County Kilkenny.

Dear Ms. Smart,

Thank you for your email of 25 March 2024, in relation to the above EIAR Scoping exercise. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (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 maintenance of the strategic capacity and safety of the national road network. In addition, Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

In relation to your EIAR scoping referral, TII notes the proximity of the proposed substation site to the existing M9 motorway national road. Having regard to the aforementioned policy context, TII considers it critical that sufficient set back from the national road motorway is achieved in the proposed development siting and layout, including mitigations, to ensure no negative direct or indirect impacts on the safety and strategic function of the national road network and associated infrastructure assets including drainage, embankments, structures, traffic counters, weather stations, telecommunications, etc.

Therefore, policy and road safety considerations would need to be resolved in any subsequent application. It is noted with concern that the EIAR correspondence received does not appear to consider or address this significant and critical policy consideration.

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 the subject site's proximity to the M9 motorway national road. Sufficient setbacks from the
 national road motorway should be achieved in the proposed development siting and layout, including
 mitigations, to ensure no negative direct or indirect impacts on the safety and strategic function of the
 national road network and associated infrastructure assets,
- 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 with the potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development, including the potential haul route,
- The developer should assess the visual impacts of 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 for any potential cumulative impacts,
- The developer, in preparing EIAR, should have regard to TII publications (formerly DMRB and the Manual of Contract Documents for Road Works).
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes (National Roads Authority, 2006),
- The EIAR should consider the European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018), 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 Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (National Roads Authority, 2014)),
- It would be important that, where appropriate, subject to meeting the thresholds and criteria and having regard to best practice, a traffic and transport assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads.
- In relation to national roads, TII's Traffic and Transport Assessment Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. 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 the applicant/developer should clearly identify the haul routes proposed and fully
 assess the network to be traversed. Where abnormal weight loads are a feature of the development, e.g.,
 substation components, separate structure approvals/permits and other licences may be required in
 connection with the proposed haul route. All national road 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.
 - In addition, the haul route should be assessed to confirm capacity to accommodate abnormal length loads and any temporary works required are identified.
- The national road network is managed by a combination of PPP (Public-Private Partnership) Concessions, Motorway Maintenance and Renewal Contractors (MMaRC) and local road authorities in association with TII.

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

Where temporary works within any MMaRC boundary are required to facilitate the transport of substation components to the site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works-specific deed of indemnity will be needed by TII before the works can take place.

- Additionally, any damage caused to the pavement on the existing national road arising from any temporary
 works due to the turning movement of abnormal loads (e.g., tearing of the surface course, etc.) shall be
 rectified in accordance with TII Pavement Standards and details in this regard shall be agreed with the road
 authority prior to the commencement of any development on site.
- Any grid connection and cable routing proposals should be developed to safeguard proposed road schemes
 as TII will not be responsible for costs associated with future relocation of cable routing where proposals are
 catered for in an area of a proposed national road scheme. In that regard, consideration should be given to
 routing options, use of existing crossings, depth of cable laying, etc.

While TII acknowledges that the grid connection routing options identified in the EIAR Scoping referral do not directly impact the strategic national road network, it is noted that as the project develops, grid routing may alter. In that regard, please note, that in the context of the existing national roads network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the National Investment Framework for Transport in Ireland and the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

There are around 99,000km of roads in Ireland, the national road network which caters for strategic inter-urban travel consists of only approximately 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. TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy.

For all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives to grid connection takes place, including alternatives to public roads, where appropriate.

In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact the ability and cost of general maintenance, upgrades and safety works to existing national roads.

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.

Where grid connection involves proposals to cross a motorway works specific deeds of indemnities, arrangements for third-party access or consent from TII in accordance with Section 53 of the Roads Act, 1993, is required. Arrangements for third-party access are likely to be required. Contact should be made to third-partyworks@tii.ie to progress this element when proposals for the crossings have been developed.

General requirements for directional drilling under a motorway include:

- The launch and reception pits for the crossing are located outside the motorway boundary,
- The cabling will be installed at such depth so as not to conflict with the drainage for the motorway,

- Neither the works nor the cable crossing will damage or interfere with the motorway,
- Any maintenance and/or future planned upgrades of the cabling at the crossing location can be carried out without access to the motorway boundary,
- There are no bolted joints in that part of the crossing within the motorway fence line,
- A pre and post-construction survey shall be required along the length of the crossing over the extent of the motorway boundary,
- Specific requirements may also arise for these proposed works.

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 hope this information is of assistance to you.

Yours sincerely,

Alban Mills Senior Regulatory & Administration Executive



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Raymond Ryan <rryan@towercom.ie> From:

Sent: 05 April 2024 17:18 Steph Smart To:

RE: Pre-application Scoping Request Subject:

Thanks Steph,

Currently Towercom have no links within 10km of the proposed substation & UG electricity cables.

Kind Regards,

Ray

Ray Ryan

Property Manager

m: +353 87 9718041 Website | LinkedIn











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From: Steph Smart <steph.smart@galetechenergy.com>

Sent: Friday, April 5, 2024 4:45 PM

To: Raymond Ryan <rryan@towercom.ie> Subject: RE: Pre-application Scoping Request

Hi Raymond,

Please see attached KMZ file.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services



steph.smart@galetechenergy.com

+44 (0)7725710754 | <u>+353 (0)49 555 5050</u>



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www.galetechgroup.com



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From: Raymond Ryan < rryan@towercom.ie>

Sent: Friday, April 5, 2024 4:37 PM

To: Steph Smart <steph.smart@galetechenergy.com>

Subject: FW: Pre-application Scoping Request

Hi Steph,

Do you have location in a mapped file please?

Kind Regards,

Ray

Ray Ryan

Property Manager

m: +353 87 9718041 Website | LinkedIn











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From: Requests < requests@towercom.ie > Sent: Monday, March 25, 2024 4:57 PM

To: Raymond Ryan < rryan@towercom.ie Subject: FW: Pre-application Scoping Request

From: Steph Smart < steph.smart@galetechenergy.com >

Sent: Monday, March 25, 2024 3:59 PM
To: Requests < requests@towercom.ie >
Subject: Pre-application Scoping Request

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Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | +353 (0)49 555 5050

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From: Keiran Butler < Keiran.Butler@virginmedia.ie>

Sent: 03 April 2024 14:48

To: Steph Smart

Cc: Mark Nolan; Cathal O Donnell

Subject: RE: Pre-application Scoping Request

Hi Steph

VirginMedia Ireland **DO NOT** have any radio links in this area

Regards Keiran Butler

From: Cathal O Donnell < Cathal. ODonnell@virginmedia.ie>

Sent: Monday, March 25, 2024 4:06 PM

To: Keiran Butler < Keiran.Butler@virginmedia.ie > Cc: Mark Nolan < Mark.Nolan@virginmedia.ie > Subject: FW: Pre-application Scoping Request

From: Steph Smart < steph.smart@galetechenergy.com >

Sent: Monday, March 25, 2024 4:03 PM

To: Cathal O Donnell < Cathal. ODonnell @virginmedia.ie >; Liam. Allister @virginmedia.ie

Subject: Pre-application Scoping Request

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To whom it may concern,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

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steph.smart@galetechenergy.com

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From: DIG < Dig@gasnetworks.ie>

 Sent:
 26 April 2024 10:01

 To:
 Mary Shephard

Cc: Process Safety; Chris Dillon (C); Steph Smart; Donal O'Caoimh

Subject: RE: Pre-application Scoping Request

Attachments: a1_dbyd_plot_15950654314842680280.pdf; GNI Code of Practice for Working in

Vicinity of Tx Network 2021.pdf; Safety Advice for working in the vicinity of Gas

pipes 2021.pdf

*** [CONFIDENTIAL] ***

Mary

I believe the proposed 110kv cable will be crossing our High pressure pipeline.

Once the route has been finalized, we can send on more detailed drawings of the crossing point.

Regards

Michael O Connell
GIS Super User
Gas Networks Ireland

P.O. Box 51, Gasworks Road, Cork, Ireland

M 087 3833858

From: Mary Shephard <Mary.Shephard@kilkennycoco.ie>

Sent: Monday, April 22, 2024 12:37 PM

To: DIG <Dig@gasnetworks.ie>; Process Safety <ProcessSafety@gasnetworks.ie>

Subject: Pre-application Scoping Request

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A chara

An Internal Referral request has been received in relation to the above development.

Your recommendation is requested. Please forward any report before 07/05/2024 to facilitate the Planning Authority making an early decision on this matter.

Many thanks

Mary



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

www.kilkennycoco.ie

From: Steph Smart < steph.smart@galetechenergy.com>

Sent: Monday 25 March 2024 14:19

To: Planning - County Council < planning@kilkennycoco.ie>

Subject: Pre-application Scoping Request

Dear Sir/Madam,

Please find attached a pre-application scoping request for a proposed 110kV Electricity Substation & Underground Electricity Cables in County Carlow & County Kilkenny. I would appreciate if you could revert with any comments you may have in relation to this proposed development within the timeframe specified in the attached.

Kind regards, Steph

Steph Smart | Graduate Planner | Galetech Energy Services

steph.smart@galetechenergy.com

+44 (0)7725710754 | +353 (0)49 555 5050

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Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimiscthe agus féadfar é a bheith

neamhdhleathach. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Gáis Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscthe na faisnéise seo. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scrios an t-ábhar ó gach aon ríomhaire.

Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdaraithe. Ní ghlacann Líonraí Gáis Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtaireachtaí chuig nó ó Líonraí Gáis Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Gáis Éireann a chinntiú agus chun ár ngnó a chosaint. Líonraí Gáis Éireann cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, atá corpraithe in Éirinn leis an uimhir chláraithe 555744 agus a tá hoifig chláraithe ag Bóthar na nOibreacha Gáis, Corcaigh, T12 RX96.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.





Code of Practice for Working in the Vicinity of the Transmission Network

Procedure No: AO/PR/127 Rev 3 Date: May 2021







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When carrying out work in the vicinity of the tranmsission network follow the following process

IMPORTANT:

Flowchart should be used in conjunction with this Code of Practice and not in isolation. If at any time during the works the transmission network is damaged, even slightly, then observe the precautions in Section 1 of this document.

DESIGN & PLANNING

Consider the requirements of this document and the impact on proposed works (Sections 8 & 9)

CONTACT GAS NETWORKS IRELAND

Contact Gas Networks Ireland to obtain formal consent (Section 5)

NOTICE TO COMMENCE

Having received formal consent, a minimum of 5 working days notice prior to commencement of the work is required

REQUEST MARKING OUT OF TRANSMISSION PIPELINE ROUTE

A minimum of 3 working days notice is required by GNI to mark out the transmission pipeline route

OBSERVE RESTRICTIONS

Observe GNI restrictions on the allowed proximity of mechanical excavators and other power tools and the measures to protect the transmission pipeline and associated installations during any works (Sections 10, 11, 12 & 13)

NOTE: GNI may wish to oversee the work. Such instances will be identified in the formal consent

BACKFILLING

Contact GNI prior to any backfilling over, alongside or under the transmission pipeline and obtain GNI's agreement to proceed. GNI require 2 working days notice prior to backfilling (Section 12)

SPECIFIC ACTIVITIES

If work involves any of the following activities:
 Trenchless Techniques, Piling,
 Surface Mineral Extraction, Land Filling, Demolition,
Blasting, Pressure Testing, Seismic Surveys, Wind Farms
 Comply with the requirements in Section 14

If in doubt contact Gas Networks Ireland



Foreword

Compliance with this Code of Practice does <u>NOT</u> confer immunity from prosecution for breach of statutory or other legal obligations.

This code of practice does **not** cover emergency work or normal agricultural work (as defined below), but it is recommended that in such cases the requirements of the code should be observed as far as possible.

Any damage to a transmission pipeline or its coating can affect its integrity and can result in failure of the transmission pipeline with potentially serious hazardous consequences for individuals located in the vicinity of the transmission pipeline. It is therefore essential that the procedures outlined in this document are complied with when working near the transmission network.

Failure to apply for consent and/or to comply fully with this Code of Practice to the satisfaction of GNI may result in the commencement of legal proceedings by Gas Networks Ireland to stop such works.

Activities associated with working in the vicinity of the transmission network may impact on the safety of the general public, site workers, GNI staff and contractors, and may affect the local environment. All Third Parties working close to the transmission network shall carry out suitable and adequate risk assessments prior to the commencement of work to ensure that all such issues are properly considered and risks mitigated.

Contractors and other users external to GNI should direct their requests for further copies of GNI engineering documents to Gas Networks Ireland.

1 Safety Procedure in the Case of Damage to the Transmission Network

If the GNI transmission network is damaged or leaking, the following precautionary measures shall be taken immediately:

- In the event of gas leakage do **not** switch any machinery on or off in the vicinity of the leak.
- Advise GNI or its representative if there are any safety features on the machine such as engine idling automatic shutoff facilities.
- Prohibit smoking, the use of naked flames, the use of electrical switches, the use of mobile phones and the use of all other ignition sources in the vicinity of the leak/damage.
- Evacuate all personnel away from and upwind of the affected area.
- Ensure that no one approaches the affected area without the consent of Gas Networks Ireland.
- Once clear of the area, report all damage or leakage, however minor it may appear, to the Gas Networks Ireland 24hr Emergency Service on 1800 205050
- Do **not** attempt to repair the damage or stop the leak.

Note: Any damage to the coating of a GNI transmission pipeline, no matter how apparently insignificant, shall be brought to the attention of GNI in order to carry out repairs. Minor damage to pipe coating and/or ancillary connections brought to the attention of GNI will be repaired *free of charge*.

1800 20 50 50 24hr emergency service

2 Definitions

For the purpose of this Code of Practice the following definitions shall apply:

GNI: Gas Networks Ireland.

GNI Inspector: The person appointed from time to time by GNI, to act as the GNI Representative on site, to ensure compliance with this Code of Practice.

Third Party: The promoter of New Works, the person or persons, firm, company or authority for whom new services or other works are being provided, including their servants, agents and contractors.

Wayleave: A strip of land, upon and over which GNI has, under the terms of Gas Act (1976 as amended), acquired the rights to lay, construct, inspect, maintain, protect, use, replace, remove or render unusable a main or pipe for the transmission or storage of gas or other materials connected with the exercise and performance of the functions of GNI and all necessary apparatus ancillary thereto. The wayleave can extend up to 9 metres either side of the transmission pipeline.

A GNI wayleave is a legal burden on the title of the property within which it exists and is noted as such on the relevant Land Registry Folio.

Normal Agricultural Works: For the purpose of this Code of Practice, 'Normal Agriculture Works' are such works which do **not** involve the use of

- a) Excavators (tracked or wheeled) irrespective of the proposed excavation depth, or
- Other mechanical soil penetrating machines such as fence post augers.

Installation: GNI transmission installations are primarily above ground (AGI) with a number below ground (UGI) comprising some or all of the following: Main stream pipework, control pipework, telemetry, instrumentation, boiler houses, analyser kiosks, generators and services.

Hot Works: Hot works is any tool, equipment and/or activity, which produces sparks, fire or has the potential to cause fires or explosions including, but not limited to, electric/battery powered tools, welding, cutting, brazing, soldering, grinding, etc.

Distribution Strategic Mains: Due to an increased gas safety risk the following Dx mains shall be designated as strategic:

- Single feeder mains to with in excess of 5000 customers
- PF400 mains.

3 Scope

This Code of Practice sets out the requirements and considerations for the design, construction and maintenance of services and/or structures and other works in the vicinity of existing Gas Networks Ireland (GNI) Gas transmission pipelines and associated Installations located in both Wayleaves and public roadways.

4 Purpose

The purpose of this Code of Practice is to:

- Set out considerations for the design, planning and execution of works.
- Advise on the GNI procedures associated with works.
- Identify the measures to be taken to ensure the integrity of the gas network,
 and
- Assist in ensuring the safety of persons involved in the works.

5 Formal Consent

Work shall not be undertaken within a wayleave, installation, or within 3 meters either side of a transmission pipeline or distribution strategic mains in a public roadway without the prior Formal Consent of Gas Networks Ireland.

- GNI shall be consulted if work is to be undertaken within 10 meters either side
 of a transmission pipeline or distribution strategic mains in a public roadway.
- Formal Consent may be issued by GNI following receipt of the following items.
- Written agreement to implement the terms and conditions of this Code of Practice and any site specific requirements as advised by GNI.
- A method statement detailing the work which will be undertaken and the means of ensuring the integrity of the gas network.
- An indemnity as outlined in Section 5.
- Evidence of insurance cover to the level required by GNI.
- Formal Consent may, in its simplest form, consist of a valid GNI Permit or a more comprehensive list of conditions.
- Where Formal Consent has been issued, the Third Party shall notify GNI,
 5 working days in advance of commencing the works.

6 Indemnity

It is an essential part of the granting of Formal Consent in the terms of this document that the Third Party shall indemnify GNI, its servants, agents and contractors against all loss, damage, expense, claims and actions incurred by or brought against GNI, its servants, agents and contractors in consequence of the provision of the new service and any works and activities associated therewith, or ancillary thereto.

7 Role of GNI Inspector

The primary role of the GNI inspector is to ensure the integrity of the gas network.

The GNI Inspector has the right to stop any work where in his/her opinion, the actions of the Third Party may adversely affect the integrity of the gas network.

The GNI Inspector shall inform the person in charge on site of his/her reason for stopping work and afford them the opportunity to address the issue to the satisfaction of the GNI Inspector.

A 'Corrective Action' shall be issued and recorded against the Third Party if the reason for stopping work is for non-conformance to any, some or all of the following:

- This Document,
- Conditions of the Formal Consent,
- Conditions of GNI Permits.

The GNI Inspector reserves the right to inspect any plant or equipment and/or any or all documentation/certification associated with plant, equipment and/or personnel associated with the work and not permit the use of any such plant, equipment and/or personnel in the works if found to be non-compliant.

8 Design Consideration for Proposed Works

8.1 Services Crossing Transmission Pipelines and Distribution Strategic Mains

Where a new service is to cross over the transmission pipeline or distribution strategic mains a clearance distance of 0.6 meters between the crown of the pipeline and underside of the service shall be maintained. If this cannot be achieved the service shall cross under the transmission pipeline with a minimum clearance distance of 0.6 meters.

8.2 Services Parallel to Transmission Pipelines and Distribution Strategic Mains

Pipelines within a wayleave

No new service shall be laid parallel to the transmission pipeline within a wayleave.

Pipelines within a roadway

- Any new service running parallel to a transmission pipeline in a roadway may, in consultation with GNI, be laid with a minimum horizontal clearance of 1m (5m for High Tension Cables) to the side of the pipeline and may not be above or below a transmission pipeline within that distance.
- Under certain circumstances consideration may be given to the relaxation
 of the above conditions on a case by case basis following prior consultation
 with GNI Asset Integrity, where the methods and safeguards to be employed
 have been considered and specified under a Safe System of Work Plan and
 where the work is supervised by GNI on site.

8.3 Cathodic Protection

Cathodic Protection is applied to GNI's transmission network and is a method of protecting pipelines from corrosion by maintaining an electrical potential difference between the pipeline and anodes placed at strategic points along the pipeline.

Where a new service is to be laid and is to be similarly protected, GNI will need to carry out interaction tests to determine whether its own system is adversely affected. The cost of any mutually agreed remedial action shall be borne by the Third Party.

Should any cathodic protection posts or associated apparatus need moving to facilitate construction operations, reasonable notice shall be given to GNI.

8 Design Consideration for Proposed Works (continued)

8.4 Installation of Electrical Equipment

Where electrical equipment is being installed close to the transmission network, the effects of a rise of earth potential under fault conditions shall be considered by the third party and a risk assessment shall be submitted to GNI for its approval as part of the Formal Consent process.

8.5 Slabbing and Other Protective Measures

Protective measures including the installation of concretes slab protection shall **not** be installed over or near to the transmission pipeline without the prior written consent of GNI.

Where consent has been given, a GNI Inspector must be present for the entire installation.

The material, composition, dimensions and method of installation of the proposed protective measure shall be agreed with GNI and shall form part of the submission for Formal Consent.

8.6 Changes to Depth of Cover

Any works, which will result in an increase or decrease in the cover of an existing Transmission Pipeline or distribution strategic mains on completion of those works, shall be agreed with GNI in advance.

9 General Consideration for Proposed Works

9.1 GNI Protective Measures

Where protective measures are required by GNI, work shall **not** commence until such time as the GNI Inspector is satisfied that those measures meet the requirements of GNI.

9.2 Gaseous Atmospheres

Third Parties shall be mindful of potentially gaseous atmospheres and the generation of sparks, particularly indoors or when a change in wind conditions/direction occurs.

9.3 Inductions

Personnel involved in the works may be required to attend a GNI induction. Such a requirement shall, if required, be identified in the Formal Consent.

9.4 Method Statements

Method statements, where required, shall include risk assessments and be submitted to GNI for review no fewer than 10 working days in advance of commencing works associated with that method statement.

9.5 Identification of Transmission Pipeline and Strategic Mains Routes

Before any work is carried out in the vicinity of existing transmission pipelines or distribution strategic mains, GNI shall, with 3 working days notice, mark/peg out the transmission pipeline route.

The Third Party shall confirm the position of the pipeline before work commences

A GNI Inspector shall be in attendance for the duration of the excavation of any trial holes necessary to confirm the position of the pipe.

9.6 Handheld Power Assisted Tools

Where the use of handheld power assisted tools is required in the vicinity of the live network, alternatives to electrically/battery powered tools should, in the first instance, be considered. These tools, as with others, by virtue of their makeup generate a spark when activated/run and as such are in themselves subject to 'Hot Work' permits and associated procedures.

9 General Consideration for Proposed Works (continued)

9.7 Hot Work

Hot works shall **not** take place within an installation, wayleave or within 3 metres either side of a transmission pipeline in a public roadway without the prior written consent of Gas Networks Ireland.

9.8 Induced Voltage

Where high voltage power lines run parallel to a transmission pipeline, there is potential to induce high voltages on the pipeline. To prevent injury, people working on exposed pipe in this area must have suitable protection against electric shock. GNI can provide advice in relation to suitable protection measures and a GNI Inspector must be present when any such work is being performed.

9.9 Construction Traffic

Construction traffic shall not be sited over or moved along or across a transmission pipeline without the prior written approval of GNI.

Construction traffic shall only cross a transmission pipeline at previously agreed and clearly marked crossing lanes.

All crossing lanes shall be fenced on both sides over a width to be specified by GNI. These fences shall be returned along the wayleave on both sides for a distance of 6m away from the crossing.

The crossing lane shall be protected by laying approved sleeper rafts or by protection made from other GNI approved materials, unless otherwise agreed in writing with GNI.

Construction traffic shall be operated at "dead slow" when using crossing lanes.

Suitable warning notices, drawing attention to the danger of not using the crossing, shall be erected and maintained in a clearly legible condition.

9.10 Lifting

Any plant and/or equipment involved in lifting shall be certified fit for purpose.

Slewing across an exposed pipe shall not be permitted. However, under certain circumstances consideration may be given to the relaxation of this rule on a case by case basis provided that the lifting methods and safeguards to be employed have been formally **risk assessed and the work is approved and**

9 General Considerations for Proposed Works (continued)

supervised by GNI or its representative on site. Reference can be made to the **GNI Lifting Procedure AO/PR/174.**

9.11 Storing Materials

Materials, including those excavated or stripped shall not be stored within a wayleave or Installation without the prior written approval of GNI.

Materials, including those excavated or stripped shall not be stored over a transmission pipeline.

9.12 Fires

Fires shall **not** be permitted within a wayleave or in the vicinity of an installation.

10 Preliminary Works

10.1 Demarcation

Where work is being carried out parallel to a transmission pipeline within or immediately adjoining a wayleave, a demarcation line shall be erected, to the satisfaction of GNI, so as to clearly delineate the boundary between the works site and the wayleave/pipeline.

10.2 Surface Stripping

Cultivated/Unmade Ground

 Where trial holes have established that sufficient depth of cover exists, light tracked vehicles may strip top soil to a depth of 0.25 metres using a toothless bucket.

Metalled Surfaces

- Bituminous or concrete surface layers may be stripped to a depth of 0.3 metres by mechanical means.
- Where the bituminous or concrete layer extends below 0.3m, only the
 use of handheld power assisted tools is permitted, and only in the
 presence of GNI.

11 Excavations

11.1 Plant/Equipment Limitations

The following limitations shall be observed when working in the vicinity of a transmission pipeline or distribution strategic mains.

- Hand dig within 1.5 meters of the pipeline.
- Handheld power assisted tools permitted beyond 1.5 meters of the pipeline.
- Mechanical excavators permitted beyond 3 meters of the pipeline.
- The use of 'chain trenchers' is not permitted within 3 meters of the pipeline.
- A mechanical excavator may **not** reach across a pipeline while working,
 i.e. cab at one side of pipeline with bucket (rock breaker, etc.) on opposite side of pipeline.
- A mechanical excavator shall **not** 'pull' towards the pipeline.

Under certain circumstances consideration may be given to the relaxation of the above conditions on a case by case basis provided that the excavation methods and safeguards to be employed have been considered and specified under a Safe System of Work Plan and the work is approved and supervised by GNI on site.

Factors that should be considered in this determination include, but are not limited to:

- Pipeline size, pressure, wall thickness and location.
- Excavator size (weight)
- Operator competency and experience
- Type and width of bucket/attachment
- Type and width of bucket/attachment (e.g. toothless)
- Ground conditions (e.g. rock, soft ground etc.)
- Weather conditions
- Visibility, particularly of the machine operator
- Machine orientation (e.g. working along the axis of the pipe)
- Supervision arrangements

Note: Mechanical excavators <u>must never be permitted</u> to work closer than 0.5 meters from the pipeline.

11 Excavations (continued)

11.2 Exposed Pipeline Protection

Once a pipeline has been exposed, it shall be immediately protected with timber or nylon batons at least 50mm wide and 25mm thick secured to each other with webbing at a distance of no greater than 10mm over the entire exposed area of the pipeline. The method of securing the webbing to batons should be such that any impact would not cause damage to the pipeline coating or other methods approved by GNI.

Where heavy gauge trench sheets are used in addition to batons to protect a pipeline, care should be taken while placing the trench sheets that buried stones, debris, etc. are not dislodged against the pipeline.

Depending on the type of work being carried out, ground conditions, etc., GNI may require additional measures.

11.3 Pipeline Support

Where it is necessary to excavate below a transmission pipeline, the pipeline shall, during stages of the operation, and for the duration of the works, be supported to the satisfaction of GNI, by means of ratchet straps secured to a steel beam (or GNI approved equivalent) across the pit/trench. On completion, permanent supports shall, if necessary, be constructed to avoid future settlement.

12 Backfilling

The Third Party shall give GNI at least 2 working days' notice of their intention to backfill below, above or adjacent to an existing transmission pipeline.

The Third Party shall afford GNI the opportunity and facility to inspect the coating on the pipeline and/or ancillary connections to the pipeline prior to backfilling.

A GNI Inspector shall be in attendance to monitor backfill around the pipeline during the whole of the backfilling operations.

Note: Any damage to the coating of a GNI transmission pipeline, no matter how apparently insignificant, shall be brought to the attention of GNI in order to carry out repairs. Minor damage to pipe coating and/or ancillary connections brought to the attention of GNI will be repaired *free of charge*.

13 Above Ground Installations

13.1 PPE Requirements

GNIs minimum PPE requirements for working in a live installation are hard hat, safety glasses, safety shoes/boots, gloves and Hi-Viz Jacket/vest. All clothing shall be anti-static and flame retardant. Contact GNI Safety Department for information on compliance of PPE.

13.2 Above Ground Pipework With Ancillary Connections

Where construction plant and machinery are used in an AGI, all above ground pipework with ancillary control pipework, telemetry and/or instrumentation adjacent to the work, shall be protected on all sides by timber/metal hoarding, secured in place, a minimum of 2 meters from any extremity and extending vertically to the uppermost point of any pipe/equipment. A suitable point of access shall be provided in the hoarding. Where this 2 meter separation distance cannot be physically achieved due to the layout and size an installation, the works may be allowed to proceed but only where suitable precautions have been agreed and implemented to protect all relevant pipework and personnel.

13 Above Ground Installations (continued)

The risks and associated mitigating measures shall be identified on the relevant risk assessment and method statement for the proposed works. The relevant details supporting any relaxation of this code of practice shall be recorded on the relevant general works permit or excavation permit by the permit issuer.

Heras type fencing may be used where a distance of 6m from any extremity can be achieved.

13.3 Above Ground Pipework Without Ancillary Connections

Where construction plant and machinery are used in an AGI, all above ground pipework which does **not** have ancillary connections adjacent to the work, shall be protected on all sides by heras type fencing a minimum of 2 meters from any extremity. A suitable point of access shall be provided in the fencing. Where this 2 meter separation distance cannot be physically achieved due to the layout and size an installation, the works may be allowed to proceed but only where suitable precautions have been agreed and implemented to protect all relevant pipework and personnel. The risks and associated mitigating measures shall be identified on the relevant risk assessment and method statement for the proposed works. The relevant details supporting any relaxation of this code of practice shall be recorded on the relevant general works permit or excavation permit by the permit issuer.

13.4 Vehicles, Plant and Machinery

Only diesel powered vehicles are permitted within the confines of an AGI. Petrol, Electric or compressed natural gas CNG vehicles are not permitted.

All plant and machinery used within an AGI shall be diesel powered.

Petrol or electrically powered equipment may be used under hot works permit system if a diesel alternative is not available. Any hot works permit for petrol powered equipment are issued at the discretion of GNI and to be supervised by GNI or its representatives.

13.5 General

This code of practice shall apply to all work carried out within an AGI.

14 Specific Activities

This section details the precautions that need to be taken when carrying out certain prescribed activities in the vicinity of the transmission network. Consult GNI if you are intending to undertake one of the listed prescribed activities and/or you require further advice on whether the work that you are intending to undertake has the potential to affect the transmission network.

The table below shows, for some specific activities, the prescribed distances within which GNI shall be consulted.

Activity	Distance within which GNI shall be consulted		
Any Excavation Actions	10 m		
Piling	15 m		
Surface Mineral Extraction	100 m		
Land filling	100 m		
Demolition	150 m		
Blasting	400 m		
Wind Farm	2 times the turbine mast height from the nearest edge of a transmission pipeline		
Trenchless Techniques	10 m		
Pressure Testing	8 m		

14.1 Trenchless Techniques

Trenchless techniques must **not** take place within 10m of the GNI Transmission Network without prior consultation with GNI.

14.2 Piling

Piling shall **not** be permitted within 15 metres of the transmission network without an assessment of the vibration levels at the pipeline. Contact GNI with regard to peak particle velocity criteria and other precautionary measures.

Where ground conditions are of submerged granular deposits of silt and sand, an assessment of the effect of vibration on settlement and liquefaction at the transmission pipeline shall be made.

14 Specific Activities (continued)

14.3 Surface Mineral Extraction

An assessment shall be carried out on the effect of surface mineral extraction activity within 100 meters of the transmission network.

Where the mineral extraction extends up to the transmission pipeline wayleave, a stable slope angle and stand-off distance between the transmission pipeline and slope crest shall be determined by GNI. The wayleave strip should be clearly marked by a suitable permanent boundary such as a post and wire fence, and where appropriate, slope indicator markers shall be erected to facilitate the verification of the recommended slope angle as the slope is formed, by the Third Party. The wayleave and slope needs to be inspected periodically to identify any signs of developing instability. This may include any change of slope profile including bulging, the development of tension cracks on the slope or wayleave, or any changes in drainage around the slope. The results of each inspection should be recorded.

Where surface mineral extraction activities are planned within 100 meters of the transmission pipeline but do not extend up to the pipeline wayleave boundary, an assessment, by GNI may be made on whether the planned activity could promote instability in the vicinity of the pipeline. This may occur where the transmission pipeline is routed across a natural slope or the excavation is deep. A significant cause of this problem is where the groundwater profile is affected by changes in drainage or the development of lagoons.

Where the extraction technique involves explosives the provisions of section 14.6 apply.

14.4 Land Filling

The creation of slopes outside of the wayleave may promote instability within the vicinity of the transmission pipeline. An assessment should therefore be carried out on the effect of any land filling activity within 100 meters of a transmission pipeline. The assessment is particularly important if land filling operations are taking place on a slope in which the pipeline is routed.

14.5 Demolition

Demolition shall **not** be permitted within 150 meters of a transmission network without an assessment of the vibration levels at the pipeline. Contact GNI with regard to peak particle velocity criteria and other precautionary measures.

Where ground conditions are submerged granular deposits of silt or sand, an assessment of the effect of vibration on settlement and liquefaction at the transmission pipeline shall be made.

14 Specific Activities (continued)

14.6 Blasting

Blasting shall **not** be permitted within 400 meters of a transmission network without consulting GNI and making an assessment of the vibration levels at the pipeline. Contact GNI on **1800 42 77 47** with regard to peak particle velocity criteria and other precautionary measures.

Where ground conditions are of submerged granular deposits of silt or sand, an assessment of the effect of vibration on settlement and liquefaction at the transmission pipeline shall be made.

14.7 Pressure Testing

Hydraulic or pneumatic testing shall **not** be permitted within 8m of the transmission network unless precautions have been taken against the effects of a possible burst. These precautions may include the use of pre installation tested pipe, sleeving, barriers, etc., as agreed with GNI.

14.8 Seismic Surveys

GNI shall be advised of any seismic surveying work in the vicinity of a transmission pipeline. Contact GNI with regard to peak particle velocity criteria and other precautionary measures.

14.9 Wind Farm Development

GNI should be consulted if wind turbines are to be sited any closer than 2 times the proposed height of the turbine mast away from the nearest edge of a transmission pipeline or associated installation.

14.10 Solar Farm and Battery Storage Facilities

GNI shall be consulted if Solar Farm or Battery Storage Facilities are to be sited in the vicinity of a transmission pipeline or associated installation.

15 Referenced External Documents

IS328: Code of Practice for Gas Transmission Pipelines & Pipeline Installations.

HSA Code of Practice for Avoiding Danger from Underground Services

HSA Guide to Safety in Excavations

Both are available free of charge from:

Health and Safety Authority on 1890 289 389/ www.hsa.ie

16 Referenced Gas Networks Ireland Documents

Categorizing & Processing of Dial Before You Dig Queries	AM/WI/072
Guide to Dealing with DBYD Online Queries	HSQE/GU/033
Dial Before You Dig Process (Map)	HSQE/BP/042
Safety Advice for Working in Vicinity of Natural Gas Pipelines	HSQE/GU/016
GNI Lifting Procedure	AO/PR/174

17 Safety Information

The online version of this code of practice is available at

https://www.gasnetworks.ie/home/safety/dial-before-you-dig/

Before starting any excavation work, it is essential to check for the location of gas pipes by calling **1800 42 77 47** or emailing **dig@gasnetworks.ie**

In an Emergency dial **1800 20 50 50**



1800 20 50 50 24hr emergency service



The main contact details for Gas Networks Ireland are:

General Enquiries 1800 464 464

Dial Before You Dig 1800 42 77 47

24hr Emergency Service 1800 20 50 50

networksinfo@gasnetworks.ie

₩ @GasNetIRL

gasnetworks.ie



Safety advice

for working in the vicinity of natural gas pipelines



Important safety information



When planning any excavation works dial 1800 42 77 47

to obtain up to date gas network maps.

Monday to Friday 9am - 5.30pm

Or you can sign up to DBYD online at

gasnetworks.ie/dbyd

and have access to maps 24 hours, 7 days a week You can also contact us on

dig@gasnetworks.ie

If you have damaged a gas pipe call

1800 20 50 50

immediately, even if you do not suspect that gas is leaking

24 hours, 7 days a week

If you smell gas call

1800 20 50 50

24hr emergency service

Contents





This booklet contains important safety advice. Please read the following before you start work:

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Natural gas characteristics and behaviour



Characteristics

Natural gas is:

- a highly flammable gas;
- lighter than air and will rise when released:
- non-toxic (but can suffocate in enclosed or confined spaces); and
- made up mostly of methane and has a smell added for safety purposes.

Behaviour

During an uncontrolled escape, natural gas will behave in the following ways:

- In open excavations, where there is a clear path to the atmosphere, natural gas will rise, dilute and disperse into the air.
- If the path to the atmosphere is blocked, the gas will travel through soil, ducts, drains, sewers and voids. It can also follow the line of other buried utility services. This can lead to gas entering a building or other confined spaces, and may lead to a fire or explosion.

Note: Never cover a damaged gas pipe; or attempt to carry out a repair. Call 1800 20 50 50 immediately.

Risks of damaging a gas pipe

The risks of damaging a gas pipe can be classified as:

Highest Risk



Mechanical excavators pose the highest risk and "should not be used within 500 mm of a gas distribution pipe."

(HSA Code of Practice)

Mechanical excavators must not be used within 3 metres of a Transmission pipeline.

(Refer to Code of Practice for Working in the Vicinity of the Transmission Network - AO/PR/127)

High Risk



Hand held power tools should not be used directly over the line of a gas pipe, unless the gas pipe has been positively located by hand and a safe working distance has been established.

Use of handheld power tools is not permitted within 1.5 m of a Transmission pipeline. (Refer to Code of Practice for Working in the Vicinity of the Transmission Network - AO/PR/127)

Damage to gas pipes from power tools presents a high risk to the operatives involved in the work.

Low Risk



Hand digging using shovels and spades presents the lowest risk of damaging a gas pipe.

This is the method that should be used where the presence of gas pipes is suspected or close to a known gas pipe.

Risks from a damaged gas pipe





- Remember when gas escapes, or is released in an uncontrolled way; it can fuel a fire, give rise to an explosive atmosphere or cause asphyxiation.
- If you suspect there is a gas leak, immediately call Gas Networks Ireland's 24hr Emergency Service on 1800 20 50 50.
- Gas can quickly fill underground cavities and travel into buildings through soil, or following the line of other buried utilities.
- Gas can only burn if exposed to an ignition source:
 - Do not turn electrical switches on or off
 - Do not operate any plant or equipment
 - Do not use naked flames, smoke or vape
 - Do not use mobile phones in the vicinity.
- Move people away from, and upwind of, the affected area.
- If gas has entered a confined space or building:
 - Open doors and windows
 - Turn off the gas supply at the meter
 - Do not expose to an ignition source.

Gas Networks Ireland transmission network



Gas Networks Ireland transports gas in Ireland through a network of steel and polyethylene (PE) pipes. The network operates at pressures between 20 mbar and 85 bar and is split between Transmission and Distribution pipelines.

The Transmission system is made up of steel pipes and operates from 7 bar to 85 bar.

The **Distribution** system is made up mostly of polyethylene pipes and operates from 20 mbar to 7 bar.

The **network**

The network is made up of three elements:

Transmission pipes

Distribution pipes

Pressure Regulating Installations



Transmission pipes

These are high pressure pipelines that transfer gas across the country. They are constructed from steel, with a black, white, cream, yellow or concrete coating, and may have marker posts at intervals along their length, particularly at field boundaries and road crossings.

If a transmission pipeline is identified near intended excavations then work must not proceed until Gas Networks Ireland Transmission has been consulted on 1800 42 77 47.



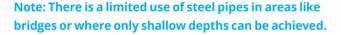
The **network**

Distribution pipes

These are medium or low pressure pipelines within urban areas. They are mainly constructed from Polyethylene (PE) and are predominantly yellow in colour, but may have brown or black stripes. There are two types – Mains and Services

Mains gas pipes usually run parallel to property in the footpath, grass verge or road and range in size from 63 mm to 400 mm diameter.

Service gas pipes are connected to mains and run to a meter position at the property, and range in size from 20 mm to 63 mm diameter.



There are still a small number of ductile and cast iron gas mains in use, ranging in size from 3 inch (75 mm) to 24 inch (600 mm) in diameter (these mains are similar in appearance to metal water mains). Steel and PE gas services are run from these metal mains to the meter location at each building.

These ductile and cast iron mains and services have been largely replaced with PE pipes. In urban areas a large number of redundant ductile or cast iron pipes are utilised as carrier pipes for new PE pipelines.

Some Distribution pipelines have been classified as strategic mains due to their pressure, diameter and/ or location and the elevated consequences if they are damaged.

If a Distribution strategic main is identified near an intended excavation then work must not proceed until Gas Networks Ireland has been consulted on 1800 42 77 47.





The **network**



District Regulating Installation (DRI)

Pressure Regulating Installations

There are two types: Above Ground and Under Ground

Above Ground Installations (AGI) / District Regulating Installations (DRI)

An AGI/DRI is a fenced area containing a visible arrangement of pipework and ancillary equipment and will be clearly marked with Gas Networks Ireland signage. Some DRI's can be housed in a steel unit with no fencing surround.

Under Ground Installations (UGI/DRlug)

Gas Networks Ireland also have underground pressure regulating installations which have metal or concrete cover plates. There will be no visible arrangement of pipework etc, as this will be contained within the chamber.

If an AGI/DRI or UGI/DRIug is identified near intended works, then work must not proceed until Gas Networks Ireland has been consulted on 1800 42 77 47.



Gas Networks Ireland construction methods

Gas Networks Ireland use three main construction methods:

'Dig' Technique



Open Cut – installing pipe using standard trenching techniques. Pipe is laid with a sand or pea gravel surround and gas marker tape is laid above the sand.

'No-Dig' Techniques



Insertion – utilising existing metal gas mains / services as a carrier for new PE pipes. Inserted PE may be a close or loose fit. The carrier pipe is broken out at connection points, i.e. at pipe joints or where a gas service pipe is connected.



Moling/Directional
Drilling – installing mains/
services where a 'moling'
machine drills from one
location to another pulling
the pipe behind it using
"no-dig" technology.

Note: Where pipe has been installed using "no-dig" techniques, the gas pipe will not have sand surround or marker tape.

Gas Networks Ireland construction - depth of cover



Typical service arrangement



Service Connection



Purge Point

New Mains – Normally 750 mm in roads and 600 mm in footpaths. (1.1 m in open fields)

New Services – 450 mm rising to 375 mm within 1.5 m of the building line. In some cases these depths are not achievable.

Note:

Older mains and services may have reduced cover.

Services and other connections are taken from the top of the main and will therefore have a reduced depth of cover

Alteration since original installation – roads, footpaths and grass verges may have been altered since the gas main or service was laid and reduced the depth of cover.

Purge Points and Test Caps – Mains are laid with "purge points" and/or test caps at the ends. These may also rise above the top of the main.

Gas Valve Covers – Gas valves are a key safety component part of the gas network.

Some gas mains and services have valves installed below ground with valve covers marked "GAS".

Do not cover over or remove gas valve covers.

The risk of a gas valve cover being removed or covered over is particularly high during resurfacing or reinstatement works.

Even shallow excavation techniques such as road planing can damage gas pipelines with reduced cover.

Requesting Gas Networks Ireland maps

Gas Networks Ireland operates a **Dial Before You Dig** service to enable those involved in excavations to obtain natural gas network maps prior to starting work.

This service operates from 9am to 5.30pm, Monday to Friday.

Or you can sign up to DBYD online at **gasnetworks.ie/dbyd** and have access to maps 24 hours, 7 days a week.

You can also email your enquiry to:

dig@gasnetworks.ie

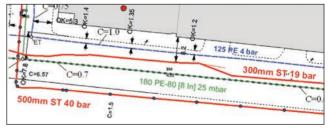


Maps will be sent out by post or by email where appropriate. When you contact Gas Networks Ireland to request a map, ensure you give the precise location of the intended works. You may be required to give some information regarding the nature of the planned work, i.e. start date, any high risk activity, etc.

Ensure you have allowed enough time for the maps to be obtained and to organise for the pipe location to be marked out if transmission pipelines are involved.

Note: Typical turnaround for maps is five working days when contact is made through phone or email, however using the online system will allow you instant access to up-to-date maps.

Organisers or planners of any work should ensure that the map is made available to personnel on-site.

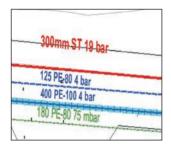


Excerpt from a Gas Networks Ireland map.

Reading Gas Networks Ireland maps

Note: Natural Gas Network maps will only show mains and not services.

See page 16 for more information on service pipe locations.



The colour coding is as follows:

Red = Transmission Main*

= 7 to 85 bar.

Blue = Distribution Medium Pressure

= 100 mbar to 7 bar.

Blue Buffer = Distribution strategic main*

= 100 mbar to 7 bar.

Green = Distribution Low Pressure

= up to 100 mbar.



Typical AGI

Pressure regulating installations are marked as:

DRI – District Regulating Installation (Above Ground).

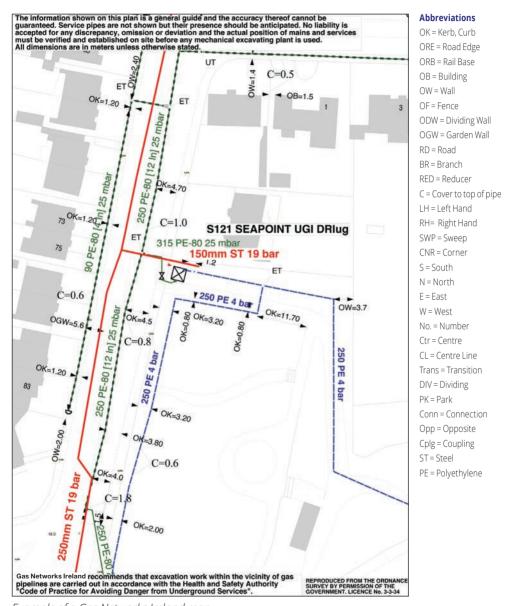
 $\textbf{DRIug} \text{ -} \ \mathsf{District} \ \mathsf{Regulating} \ \mathsf{Installation} \ (\mathsf{Under} \ \mathsf{Ground}).$

UGI - Under Ground Installation.

AGI - Above Ground Installation.

^{*} If you obtain a natural gas network map that shows a **red**Transmission main in the area of the proposed works or a
distribution strategic main with a blue buffer, a consultation
with Gas Networks Ireland **must** take place **before** starting
works. Gas Networks Ireland will advise you on the safety
measures required and will arrange for the location of the pipe
to be marked out on site.

Reading Gas Networks Ireland maps



Example of a Gas Networks Ireland map

Gas services



Typical service arrangement



Service riser cover

Natural gas services are not normally identified on network maps, but their presence should be assumed. Services will normally, but not always, run at right angles from the main to the meter point.

To assist in determining the approximate position of gas services ensure you:

- Obtain a natural gas network map to identify the position of the gas main.
- Complete a site survey looking for gas meter boxes/cabinets, house entry points, service risers and gas valve covers.
- Older buildings may have no visible signs of a service, as the service may run directly into the building underground, with the meter fitted internally. In these cases a check should be made inside the building to identify the meter position.

Note: Ensure you utilise safe digging practices to locate the exact position of gas services.



Domestic meter box



Six meter cabinet



Purpose built multi-meter house (apartment complex).

Safe systems of work

Safe systems of work, as recommended by the Health and Safety Authority (HSA) should be employed on all projects.

Guidance on this can be found in the:

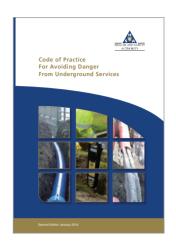
HSA: Code of Practice for Avoiding Danger from Underground Services.

Available from HSA website: www.hsa.ie

A safe system of work will include the following elements:

- Planning.
- Obtaining and using utility maps.
- Identifying pipes/services.
- Safe digging practices.
- Explosives must not be used within 30 m of any gas pipe (400 m for Transmission Pipelines), without prior consultation with Gas Networks Ireland.
- Piling, directional drilling or boring must not take place within 15 m of a gas pipe unless Gas Networks Ireland has been consulted.
- Extra care should be exercised when performing 'hot work' (such as welding)
 where a gaseous atmosphere could exist. If this potential exists Gas Networks
 Ireland must be consulted
- Extra care should also be taken when using welding equipment, burners, torches or other heat generating equipment near pipelines (even if there is no potential for a gaseous atmosphere to exist) to ensure that the heat or sparks generated do not lead to the melting of polyethylene pipes or damage to pipeline coatings.

Contact Gas Networks Ireland for general enquiries on: 1800 464 464.



Safe systems of work

Planning

- Early contact should be made with Gas Networks Ireland to obtain a Natural Gas Network map.
 Dial Before You Dig 1800 42 77 47 or visit gasnetworks.ie/dbyd
- Work involving piling, demolition, directional drilling, use of explosives or 'hot works' should be mentioned, as this may necessitate a site visit from Gas Networks Ireland personnel.
- Ensure you have allowed enough time to obtain the maps.

Maps

 Gas Networks Ireland will issue maps as outlined in this booklet. It is imperative that these maps are available for the operatives on-site for the duration of any works.
 The responsible person should ensure that operatives on-site understand the maps.

Identifying Pipes

- Steel, cast iron and ductile iron gas pipes can usually be traced using a conventional pipe/cable locating device set to "R" (Radio) mode.
- Polyethylene mains and services cannot be traced using conventional devices, so it is essential that maps are used and site surveys for meter boxes, valve covers, service risers, reinstatement scarring and other signs are completed.
- During the progress of works ensure no gas valve covers or markers are covered over.
- The position of gas mains and services should be marked out as they are located.

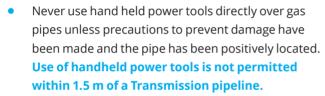
Note: Transmission pipelines pipelines and Distribution strategic mains must be marked out by a Gas Networks Ireland inspector.

Safe systems of work

Safe Digging Practices:

- As per the HSA Code of Practice, gas mains and services should be located by digging trial holes by hand. Mechanical excavators should not be used within 500 mm of any gas main.
 - Mechanical excavators MUST NOT be used within 3 m of a Transmission pipeline.

(Refer to Code of Practice for Working in the Vicinity of the Transmission Network - AO/PR/127)



(Refer to Code of Practice for Working in the Vicinity of the Transmission Network - AO/PR/127)

- Do not leave a polyethylene gas pipe exposed.
- Provide adequate support for any gas pipe uncovered during the work.
- Report any damage, no matter how minor it may appear, to 1800 20 50 50.
- If you have any concerns regarding safety around gas pipes contact Gas Networks Ireland for advice on 1800 464 464.



What to do if a gas pipeline is damaged

(or if you smell gas in the area)

- Do not turn any electrical switches on or off, e.g. ignition switches.
- Do not operate any plant or equipment.
- Move people away from, and upwind of, the affected area.
 Restrict employee and public access to the affected area.
- Prevent smoking, vaping, the use of naked flames, the use of mobile phones and other ignition sources in the vicinity of the leak.
- Report the leak/damage immediately to:
 Gas Networks Ireland 24hr Emergency Service on 1800 20 50 50.
- Provide accurate information on your location and the nature of the incident.
- Do not attempt to repair the damage.
- Do not cover up a damaged main or service, this may lead to the gas travelling through soil, ducts, sewers, chambers or voids and potentially building up inside a premises or confined space.
- Do not turn off any gas valves in the road or footpath (you may be causing further problems by doing so).
- Assist Gas Networks Ireland emergency personnel as required.
- Remember any damage to gas pipes, even if the pipe does not appear to be leaking, must be reported to Gas Networks Ireland.

1800 20 50 50 24hr emergency service

Gas Networks Ireland contacts

The main contact numbers for Gas Networks Ireland are

24hr Emergency Service 1800 20 50 50

24 hours, 7 days a week

Dial Before You Dig 1800 42 77 47

Monday to Friday 9am - 5.30pm

or sign up to DBYD online

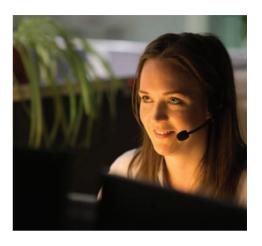
gasnetworks.ie/dbyd

General Enquiries 1800 464 464

Monday to Friday 8am – 8pm Saturday 9am – 5.30pm

gasnetworks.ie

For "Dial Before You Dig" posters or stickers for your workplace call: **1800 464 464**





Other useful publications

HSA: Code of Practice for Avoiding Danger from Underground Services

HSA: Guide to Safety in Excavations

both are available free of charge from:

Health and Safety Authority on 01 614 7000

www.hsa.ie

ESB Networks: How you can avoid hitting electrical cables when digging and drilling

available free of charge from: ESB Networks on 1800 372 757 esb.ie/esbnetworks



The main contact details for Gas Networks Ireland are:

General Enquiries 1800 464 464

Dial Before You Dig 1800 42 77 47

24hr Emergency Service 1800 20 50 50

networksinfo@gasnetworks.ie

gasnetworks.ie

Guideline No: HSQE/GU/016 Rev 2 Date: November 2020

