



## APPENDIX 2-1

### SCOPING RESPONSES

## David Naughton

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**From:** padraig.condon@bt.com  
**Sent:** Wednesday 11 November 2020 12:51  
**To:** David Naughton  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

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

Hi David,  
I can confirm the planned development will have no impact on the BT Ireland Microwave Network.

Regards

**Padraig Condon**  
**Core Network Operations**

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



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---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** 11 November 2020 12:45  
**To:** Condon,PG,Padraig,NQE32E R <padraig.condon@bt.com>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Padraig,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if BT has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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## Edel Mulholland

---

**From:** padraig.condon@bt.com  
**Sent:** Tuesday 25 March 2025 11:11  
**To:** Edel Mulholland  
**Cc:** Catherine Johnson; Susan Doran  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - BT

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Edel,  
BT Ireland no longer have microwave radio present in ROI.

**Padraig Condon**

**Core Network Operations**  
**Mobile number:** +353 86 604 0636  
**E-mail** [padraig.condon@bt.com](mailto:padraig.condon@bt.com)  
**Web:** [www.btireland.com](http://www.btireland.com)



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---

**From:** Edel Mulholland  
**Sent:** Tuesday 25 March 2025 11:06  
**To:** Padraig Condon (NQE32E R)  
**Cc:** Catherine Johnson ; Susan Doran  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - BT

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

Hello there,

I am following up on the below email regarding any updated telecom links that may be traversing the proposed Lemanaghan Wind Farm in Co. Offaly.

Could you kindly provide any updates or information on this matter at your earliest convenience?  
Thank you.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

MKO  
Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 735  
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**From:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Sent:** Wednesday 19 March 2025 14:56  
**To:** [padraig.condon@bt.com](mailto:padraig.condon@bt.com)  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - BT

Hi there,

Can I please follow up on the below email regarding updated telecoms links?

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

MKO  
Tuam Road, Galway, H91 VW84

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[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416  
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**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:23  
**To:** [padraig.condon@bt.com](mailto:padraig.condon@bt.com)  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - BT

Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all BT links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

MKO  
Tuam Road, Galway, H91 VW84

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## David Naughton

---

**From:** Roger Woods <rwoods@bai.ie>  
**Sent:** Thursday 26 November 2020 17:18  
**To:** David Naughton  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David

The BAI has no links in this area.

Regards

Roger

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

Tel: 01 6441200  
Fax: 01 6441299

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---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Thursday 26 November 2020 17:00  
**To:** Roger Woods <rwoods@bai.ie>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Roger,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if BAI has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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## David Naughton

---

**From:** Roger Woods <rwoods@bai.ie>  
**Sent:** Wednesday 5 May 2021 09:37  
**To:** David Naughton  
**Subject:** RE: 200804 - EIA Scoping Document for proposed Lemanaghan Wind Farm

Hi David

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

Regards

Roger

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

Tel: 01 6441200  
Fax: 01 6441299

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---

**From:** David Naughton <dnaughton@mkofireland.ie>  
**Sent:** Wednesday 5 May 2021 09:07  
**To:** Roger Woods <rwoods@bai.ie>  
**Subject:** 200804 - EIA Scoping Document for proposed Lemanaghan Wind Farm

Dear Mr. Woods,

Please find attached a cover letter and Scoping Document for a proposed wind farm development in Lemanaghan and adjacent townlands in Co. Offaly.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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## Edel Mulholland

---

**From:** Roger Woods <rwoods@bai.ie>  
**Sent:** Wednesday 23 October 2024 14:32  
**To:** Edel Mulholland  
**Cc:** Catherine Johnson; Ellen Costello; Susan Doran  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - BAI

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Hi Edel

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**  
Innealtóir Feidhmiúcháin Sinsearach | Senior Executive Engineer

T: +353 (0)1 644 1200 | [rwoods@cnam.ie](mailto:rwoods@cnam.ie)



**1 Áras Shíol Bhroinn, Bóthar Shíol Bhroinn, Baile Átha Cliath, D04 NP20, Éire.**  
1 Shelbourne Buildings, Shelbourne Road, Dublin, D04 NP20, Ireland.

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*Déan machnamh ar an timpeallacht, le do thoil, roimh an ríomhphost seo a phriontáil.*

*Please consider the environment before printing this email.*

---

**From:** Edel Mulholland <emulholland@mkoireland.ie>  
**Sent:** Wednesday 23 October 2024 14:11  
**To:** Roger Woods <rwoods@bai.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>  
**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - BAI

Dear Mr. Woods,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with the Broadcast Authority of Ireland in May 2021, please see attached the previous thread of conversation between yourself and MKO in relation to scoping carried out in 2021.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information, and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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## Edel Mulholland

---

**From:** Roger Woods <rwoods@bai.ie>  
**Sent:** Friday 14 March 2025 09:25  
**To:** Susan Doran  
**Cc:** Catherine Johnson; Edel Mulholland  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

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Hi Susan

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**  
Innealtóir Feidhmiúcháin Sinsearach | Senior Executive Engineer

T: +353 (0)1 644 1200 | [rwoods@cnam.ie](mailto:rwoods@cnam.ie)



**1 Áras Shíol Bhroinn, Bóthar Shíol Bhroinn, Baile Átha Cliath, D04 NP20, Éire.**  
1 Shelbourne Buildings, Shelbourne Road, Dublin, D04 NP20, Ireland.

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Déan machnamh ar an timpeallacht, le do thoil, roimh an ríomhphost seo a phrintáil.

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**From:** Susan Doran <sdoran@mkoireland.ie>  
**Sent:** Friday 14 March 2025 09:10  
**To:** Roger Woods <rwoods@bai.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Edel Mulholland <emulholland@mkoireland.ie>  
**Subject:** 200804 Lemanaghan Revised telecoms scoping

Good afternoon,

We would like to follow up on a scoping exercise that was previously completed for Lemaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

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Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all BAI links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

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## David Naughton

---

**From:** Sinead French <sinead.french@comreg.ie>  
**Sent:** Thursday 26 November 2020 12:45  
**To:** David Naughton  
**Subject:** RE: [Confidential] 200804 - Proposed Lemanaghan Wind Farm  
**Attachments:** Proposed Lemanaghan Wind Farm.xlsx

Hi David,

Please see attached list of operators within 10km of the proposed site,

Regards,  
Sinead

---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Thursday 26 November 2020 10:14  
**To:** Sinead French <sinead.french@comreg.ie>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Sinead,

Just following up to see if we can a response to the below.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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

**From:** David Naughton  
**Sent:** Wednesday 11 November 2020 15:17  
**To:** 'sinead.french@comreg.ie' <[sinead.french@comreg.ie](mailto:sinead.french@comreg.ie)>  
**Cc:** 'Martin.ODonoghue@comreg.ie' <[Martin.ODonoghue@comreg.ie](mailto:Martin.ODonoghue@comreg.ie)>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Sinead,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

We are consulting with all of the main telecoms operators, but would like to check if there are any other operators in the area. If so we would appreciate any information that could be sent on. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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

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

05/05/2021

MKO

Tuam Road,

Galway,

H91 VW84

Re: **E.I.A.R. Scoping Request for the proposed for development Lemanaghan Wind Farm at Lemanaghan and surrounding townlands in Co. Offaly**

Dear Sir/Madam,

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

If the proposed development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from **Felling Section, Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford**. Tel: 076-1064459, Web <https://www.agriculture.gov.ie/forests-service/tree-felling/tree-felling/>

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

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

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

relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement).

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

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

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

- a) subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or
- b) subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and

- c) the proposed development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species,
1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project;
- and
2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Bord 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.

Yours sincerely,

*Tara Hendley*

**Tara Hendley**

**Felling Section**

**Department of Agriculture, Food and the Marine**

**Johnstown Castle**

**Co Wexford**

## Edel Mulholland

---

**From:** Defence Property Management Planning <PropertyManagementPlanning@defence.ie>  
**Sent:** Friday 8 November 2024 15:56  
**To:** Edel Mulholland  
**Subject:** Scoping Document for Proposed Lemanaghan Wind Farm - Department of Defence  
**Attachments:** 2024-11-08 Observation Letter for Lemanaghan Wind Farm.pdf

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Dear Ms. Mulholland,

In reply to your email request below, dated 23 October 2024, please see the attached response from the Department of Defence.

Please contact me if you have any additional queries.

Best regards,  
Paul

**Paul Farrell**

*Property Management Branch*

---

**From:** Edel Mulholland <emulholland@mkoireland.ie>  
**Sent:** Wednesday 23 October 2024 14:19  
**To:** Defence Property Management Planning <PropertyManagementPlanning@defence.ie>; Defence Info <info@defence.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>  
**Subject:** 200804 -EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Department of Defence

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Dear Sir/ Madam,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with the Department of Defence in May 2021 via a scoping letter sent over email. Please see this cover letter attached for clarity.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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MKO,  
Tuam Road,  
Galway  
H91 VW84

08 November 2024

**Re: EIA Scoping Document for the Proposed Lemanaghan Wind Farm, in Lemanaghan and surrounding townlands in Co. Offaly**

**Without Prejudice**

Dear Ms. Mulholland,

I refer to your email dated 23th October 2024, in relation to Proposed Lemanaghan Wind Farm, in Lemanaghan and surrounding townlands in Co. Offaly

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

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

Based on the information supplied and following consultations with the subject matter in the Irish Air Corps, the Department of Defence wishes to make the following observations:

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



Any Irish Air Corps (IAC) requirements for are separate to Irish Aviation Authority (IAA) require

We would appreciate if you could keep us informed on any progress relating to this proposed development.

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

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

Yours faithfully,

*Sent via e-mail*

---

Paul Farrell  
Property Management Branch  
Department of Defence  
Station Road  
Newbridge  
Co. Kildare  
W12 AD93  
[paul.farrell@defence.ie](mailto:paul.farrell@defence.ie)

## Edel Mulholland

---

**From:** Jonathan Stirland (Housing) <Jonathan.Stirland@housing.gov.ie>  
**Sent:** Thursday 24 October 2024 11:45  
**To:** Edel Mulholland  
**Cc:** Karl Brady (Housing); Margaret Keane (Housing)  
**Subject:** EIAR Scoping Document for proposed Lemanaghan Wind Farm at Lemanaghan and surrounding townlands, northeast of Fermoy, County Offaly

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Dear Edel Mulholland

Thank you for your request for consultation with the NMS Re: EIAR Scoping Document for proposed Lemanaghan Wind Farm at Lemanaghan and surrounding townlands, northeast of Fermoy, County Offaly

We note that the landscape around the townland of Lemanaghan and its surrounding townlands is a peatland environment that has a high concentration of recorded monuments. This peatland landscape has a high potential for archaeological features to be uncovered during the course of any future development works.

A full archaeological impact assessment report is recommended that includes the results and detailed field survey and should be informed by further archaeological assessment i.e. pre-planning test trenching and geophysical survey where site conditions are suitable.

Kind Regards  
Jon

**Jon Stirland**

Seandálaí - *Archaeologist*  
Seirbhís Séadchomharthaí Náisiúnta - *National Monuments Service*

**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
Department of Housing, Local Government and Heritage  
Teach an Chustaim, Baile Átha Cliath 1, D01 W6X0  
Custom House, Dublin 1, D01 W6X0

M +353 (0) 85 747 9528  
T +353 (0)1

Email: [Jonathan.Stirland@housing.gov.ie](mailto:Jonathan.Stirland@housing.gov.ie)

## Edel Mulholland

---

**From:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Sent:** Tuesday 26 November 2024 11:05  
**To:** Edel Mulholland; Transport GCU  
**Cc:** Catherine Johnson; Ellen Costello; Susan Doran  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Department of Transport

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Good morning,

Thank you for contacting the Department of Transport in relation to this proposed project.

The Department has no comment to make at this point in time.

It would be appreciated if you could notify us of any further updates in relation to this project.

Kind regards  
Jacqui

**Jacqui Traynor**  
*Central Policy, Coordination and Reform*  
**An Roinn Iompair**  
*Department of Transport*  
Lána Líosain, Baile Átha Cliath, D02 TR60  
Leeson Lane, Dublin, D02 TR60  
T +353 (0)1 604 1177  
[gcu@transport.gov.ie](mailto:gcu@transport.gov.ie) [www.gov.ie/transport](http://www.gov.ie/transport)

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**From:** Edel Mulholland <emulholland@mkoireland.ie>  
**Sent:** Thursday, November 21, 2024 2:18 PM  
**To:** Transport GCU <GeneralCo-OrdinationUnit@transport.gov.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Department of Transport

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Dear Ms. Maher,

Just wanted to follow up on the below scoping exercise with regards to the Proposed Lemanaghan Wind Farm in County Offaly. Please see attached the Scoping document that was sent to you on the 23<sup>rd</sup> of October 2024.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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**From:** Edel Mulholland  
**Sent:** Wednesday 23 October 2024 14:19  
**To:** [gcu@transport.gov.ie](mailto:gcu@transport.gov.ie)  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Department of Transport

Dear Ms. Maher,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with the Department of Transport in 2021, please see attached the previous thread of conversation between yourself and MKO in relation to scoping carried out in May 2021.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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Mr David Naughton BSc  
McCarthy Keville O'Sullivan Ltd  
MKO  
Tuam Road  
Galway  
H91 VW84

18th May 2021

**Re: EIA Scoping Document for the Proposed Lemanaghan Wind Farm, in Lemanaghan  
and surrounding townlands in Co. Offaly**

Dear David,

I refer to your letter of 4th May 2021 welcoming comments or suggestions the Department might have in relation to the proposed project to be considered as part of the assessment process and in the preparation of the EIAR.

The Department has the following comments in relation to the developments proposals.

In the event that the developer proposes the placement of any cables (or additional cables) in one or more trenches within the extents of the (regional and local) public road network, it is necessary to consider the following:

- Their presence within the public road could significantly restrict the Road Authority in carrying out its function to construct and maintain the public road and will likely add to the costs of those works.
- Their installation within the lands associated with the public road may affect the stability of the road. In particular where the road is a “legacy road” (where there is no designed road structure and the subgrade may be poor or poorly drained) the design needs to take account of all the variable conditions and not be based on a sample of the general conditions.
- The possible effect on the remaining available road space (noting that there may be a need to accommodate other utilities within the road cross-section in the future).

The proposal should include consideration of the following:

- Examination of options other than the routing of cables along the public road.
- Examination of options for connection to the national grid network at a point close to the wind farm so as to reduce the adverse impact on public roads.



- Details of where within the road cross section cables are to be placed so as to minimise the effect on the Roads Authority in its role of construction and maintenance.
- Examination of details of any chambers proposed within the public road cross section so as to minimise the effect on the Roads Authority in its role of construction and maintenance, and
- Rationalisation of the number of cables involved (including existing electric or possible future cables) and their diversion into one trench, in order to minimise the impacts on the road network and the environment along the road boundary (hedgerows).

The proposal should take account of and liaise with Offaly County Council regarding the following:

- The design should comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017.
- The location of the cables should be recorded as exactly as possible (maybe using BIM type technology) so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the local authority. This record should be lodged with the local authority and with ESB Networks for retention on their records.
- All electric cables should be routed away from bridge structures and specifically, the developer should avoid attaching cables to road bridges. This would allow for the future maintenance of bridges without interruption of the electricity supply along the cables.

Yours sincerely,

**Geraldine Maher**  
*Reform Communications Emergency Planning*

---

**An Roinn Iompair**  
*Department of Transport*

## David Naughton

---

**From:** John Bagnall <john.bagnall@eir.ie>  
**Sent:** Thursday 26 November 2020 07:12  
**To:** David Naughton  
**Cc:** Mobile Networks TXN  
**Subject:** Re: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

We have no transmission services that will be affected by these works, the nearest is over 0.5Km away. Please keep sending future windfarm development analysis and large infrastructure project requests to [MobileNetworksTXN@eir.ie](mailto:MobileNetworksTXN@eir.ie) for Eir Mobile (formerly Meteor) network analysis.



Kind regards,



**John Bagnall**  
Transmission Design & Engineering

**M:** +353 85 1053746  
**E:** [john.bagnall@eir.ie](mailto:john.bagnall@eir.ie)  
Address: EirCode - D24 HX03

On Wed, 11 Nov 2020 at 13:06, David Naughton <[dnaughton@mkofireland.ie](mailto:dnaughton@mkofireland.ie)> wrote:

Hi John,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Eir has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**

Tuam Road, Galway

Ireland, H91 VW84

+353 (0) 91 735611

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



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## Edel Mulholland

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**From:** John Bagnall <john.bagnall@eir.ie>  
**Sent:** Wednesday 19 March 2025 09:58  
**To:** Susan Doran  
**Cc:** Catherine Johnson; Edel Mulholland  
**Subject:** Re: 200804 Lemanaghan Revised telecoms scoping

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Susan,

We have 1 transmission link within the proposed area that would be at risk, the end points of the transmission link are below, if you could keep a buffer of 100meters radius away from this transmission path when placing your turbines and send them on for further analysis.

Please send new development analysis requests to [MobileNetworksTXN@eir.ie](mailto:MobileNetworksTXN@eir.ie) for Eir Mobile and the Eir fixed network checks.

#	Band	A-end			Height		B-end		
Link1	11Ghz	CPD	53° 6'37.70"N	7°27'12.71"W	28	<--->	RSL	53°25'40.59"N	7°56'1.99"W





Kind regards,



**John Bagnall**

Wireless transmission engineer

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

M: 0851053746

eir, 2 Heuston South Quarter, St John's Road West, Dublin 8, D08 Y42N



On Fri, 14 Mar 2025 at 09:11, Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)> wrote:

Good afternoon,

We would like to follow up on a scoping exercise that was previously completed for Lemaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all Eircom links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,

Susan

**Susan Doran**

Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84



Offices in Galway and Dublin

[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416 765

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---

## David Naughton

---

**From:** Peter O'Brien <peter.obrien@enet.ie>  
**Sent:** Friday 11 December 2020 09:16  
**To:** David Naughton  
**Cc:** Lorraine Meehan  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm  
**Attachments:** B1 - Fresnel Zone - F3.kmz; B2 - Fresnel Zone - F3.kmz; B3 - Fresnel Zone - F3.kmz; B4 - Fresnel Zone - F3.kmz; B5 - Fresnel Zone - F3.kmz

Hi David,

Please find my kml's attached,  
I have gone with Fresnel Zone 3 which will be slightly larger to ensure there is no impact to our links,

Regards,  
Peter

---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Thursday, December 10, 2020 5:34 PM  
**To:** Peter O'Brien <peter.obrien@enet.ie>  
**Cc:** Lorraine Meehan <lmeehan@mkoireland.ie>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Peter,

Thanks for that. I have input all of the info into that weblink and come up with Fresnel zones for each link which look right, see screenshot attached. If you want to check and ensure that you are happy we will ensure that the rotor swept area of the proposed turbines (i.e. blade length) does not intersect those Fresnel zones.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**  
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**From:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Sent:** Thursday 10 December 2020 16:00  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

Below is a useful website I have used in the past for modelling the various Fresnel zones i.e. F1, F2 & F3 on Google Earth:

<http://www.radiofresnel.com/>

If I have time next week I will model each link but if you need it sooner then you should be able to create them also with the details I provided previously,

Regards,  
Peter

---

**From:** David Naughton <[dnaughton@mkofireland.ie](mailto:dnaughton@mkofireland.ie)>  
**Sent:** Thursday, December 10, 2020 3:48 PM  
**To:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Peter,

As there are five links running through the site a 100m buffer either side of each of the five, significantly reduces the viable area for turbine placement. Would it be possible that this buffer could be reduced in any way or could an accurate Fresnel zone for each link be provided?

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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---

**From:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Sent:** Thursday 26 November 2020 10:21  
**To:** David Naughton <[dnaughton@mkofireland.ie](mailto:dnaughton@mkofireland.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

If there was 100m of a buffer that would be good,

Best Regards,  
Peter

---

**From:** David Naughton <[dnaughton@mkofireland.ie](mailto:dnaughton@mkofireland.ie)>  
**Sent:** Thursday, November 26, 2020 10:13 AM

**To:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Peter,

Just following up to see if we can get a Fresnel zone or if there is a buffer required between the turbine rotors and telecoms links.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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**From:** David Naughton  
**Sent:** Thursday 12 November 2020 10:39  
**To:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Cc:** Lorraine Meehan <[lmeehan@mkoireland.ie](mailto:lmeehan@mkoireland.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Peter,

Many thanks for sending that on. Could you send me the Fresnel zone for those links so that I can ensure that an appropriate buffer is applied to avoid turbine placement in those areas?

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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**From:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Sent:** Thursday 12 November 2020 08:45  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Cc:** Lorraine Meehan <[lmeehan@mkoireland.ie](mailto:lmeehan@mkoireland.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

The below Enet links will be potentially affected:

A-End Coordinates	A-End Antenna Height	B-End Coordinates	B-End Antenna Height	Frequency
53°18'52.56"N 7°48'45.51"W	15m	53°16'54.40"N 7°46'38.70"W	5m	23GHz
53°18'52.56"N 7°48'45.51"W	15m	53°16'57.45"N 7°43'14.12"W	7m	23GHz
53°18'52.56"N 7°48'45.51"W	15m	53°16'15.58"N 7°29'26.52"W	7m	13GHz
53°18'52.56"N 7°48'45.51"W	15m	53°18'0.67"N 7°29'14.16"W	12m	11GHz
53°18'52.56"N 7°48'45.51"W	15m	53°20'26.09"N 7°36'45.83"W	7m	15GHz

Regards,  
Peter

---

**From:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Sent:** Wednesday, November 11, 2020 12:42 PM  
**To:** Peter O'Brien <[peter.obrien@enet.ie](mailto:peter.obrien@enet.ie)>  
**Cc:** Lorraine Meehan <[lmeehan@mkoireland.ie](mailto:lmeehan@mkoireland.ie)>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Peter,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Three Ireland has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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## Edel Mulholland

---

**From:** Peter O'Brien <peter.obrien@enet.ie>  
**Sent:** Friday 14 March 2025 09:52  
**To:** Susan Doran  
**Cc:** Catherine Johnson; Edel Mulholland  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Susan,

We have the below links passing through this area currently:

Link Name	A-End Coordinates	A-End Antenna Height	B-End Coordinates	B-End Antenna Height	Frequency	Set Back Distance
VDF Cor Hill - BCP Primo Coaches	53.314583 -7.812639	15m	53.281744 -7.777514	7m	23GHz	50m
VDF Cor Hill - SCP1476 Muire Naofa Castlecuffe	53.314583 -7.812639	15m	53.151685 -7.587565	7m	11GHz	50m
VDF Cor Hill - VDF Ardan	53.314583 -7.812639	15m	53.300186 -7.487267	15m	11GHz	50m

Best Regards,  
Peter

**Peter O'Brien** | Licensed Link planner

**A:** Enet House, National Technology Park, Castletroy, Co Limerick, V946P52

**M:** +353867744313 | **W:** [www.enet.ie](http://www.enet.ie)



Registered in Ireland, Registration No. 332982

Registered Offices: Enet House, National Technology Park, Castletroy, Co Limerick, V94 6P52

enet is a registered business name of e-nasc éireann teoranta



SILVER



Gold standard

**From:** Susan Doran <sdoran@mkoireland.ie>  
**Sent:** Friday, March 14, 2025 9:10 AM  
**To:** Peter O'Brien <peter.obrien@enet.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Edel Mulholland <emulholland@mkoireland.ie>  
**Subject:** 200804 Lemaghan Revised telecoms scoping

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Good afternoon,

We would like to follow up on a scoping exercise that was previously completed for Lemaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all ENet links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

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

Offices in Galway and Dublin  
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## David Naughton

---

**From:** EIAPanning <eiapanning@epa.ie>  
**Sent:** Friday 25 June 2021 14:29  
**To:** David Naughton  
**Subject:** Scoping Consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive) - Lemanaghan Wind Farm, Co. Offaly  
**Attachments:** 200804 - EIAR Scoping Document - 2021.05.04 - F - For Email.pdf; EPA Scoping Letter - 2021.05.04.pdf; Department of Environment, Climate and Communications..pdf; Failte Ireland.pdf; Offaly County Council.pdf

**Re: Scoping Opinion under Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU (EIA Directive)**

Dear Mr Naughton,

I refer to the scoping request for a proposed wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly received by the Agency on 05/05/2021.

In accordance with the requirements of Article 5(2) of Directive 2011/92/EU as amended by Directive 2014/52/EU *on the assessment of the effects of certain public and private projects on the environment* (EIA Directive), the Agency has consulted with the Planning Authority – Offaly County Council and the relevant prescribed bodies under Section 89 of the EPA Act. I attach copies of the responses received from Offaly County Council, Failte Ireland and the Department of Environment, Climate and Communications.

Bord na Móna Energy Limited, Boora Group, c/o Boora Works, Leabeg, Tullamore, Offaly was issued an IPC Licence (Register No. P0500) on 18<sup>th</sup> May 2000 for Class 1.4 of the First Schedule of the EPA Act 1992 ‘the extraction of peat in the course of business which involves an area exceeding 50 hectares’.

Having regard to the specific characteristics of the project, including location and technical capacity, and likely impact on the environment, the Agency is of the opinion that the scope and level of detail to be included in the environmental impact assessment report should as a minimum:

- (i) identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of a project on each of the factors listed in Article 3 of the EIA Directive;
- (ii) address the matters raised in the responses received from the bodies detailed above;
- (iii) have regard to the rehabilitation plan(s) required under Condition 10 of Licence Reg No. P0500 for any bog areas relevant to the proposed development;
- (iv) have regard to the *Guidelines on the information to be contained in Environmental Impact Statements, 2002*, as appropriate. (Note: there are also Draft *Guidelines on the information to be contained in Environmental Impact Assessment Reports, 2017* available);
- (v) have regard to the relevant topics contained in the EPA’s *Advice Notes on Current Practice (in the preparation of Environmental Impact Statements)* September 2003;
- (vi) satisfy the requirements of the EIA Directive.

For any further queries and correspondence relating to planning and EIA matters, please contact [eiapanning@epa.ie](mailto:eiapanning@epa.ie)

Yours faithfully,  
Environmental Licensing Programme

Environmental Licensing Programme  
Office of Environmental Sustainability  
An Clár um Cheadúnú Comhshaoil  
Oifig um Inbhuanaitheacht Chomhshaoil



053-916 0600 (Switch)

[eiaplanning@epa.ie](mailto:eiaplanning@epa.ie)

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



---

**From:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Sent:** Wednesday 5 May 2021 11:00  
**To:** EIAPanning <[eiaplanning@epa.ie](mailto:eiaplanning@epa.ie)>  
**Subject:** 200804 - EIA Scoping Document for proposed Lemanaghan Wind Farm

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed wind farm development in Lemanaghan and adjacent townlands in Co. Offaly.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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Ireland, H91 VW84  
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## David Naughton

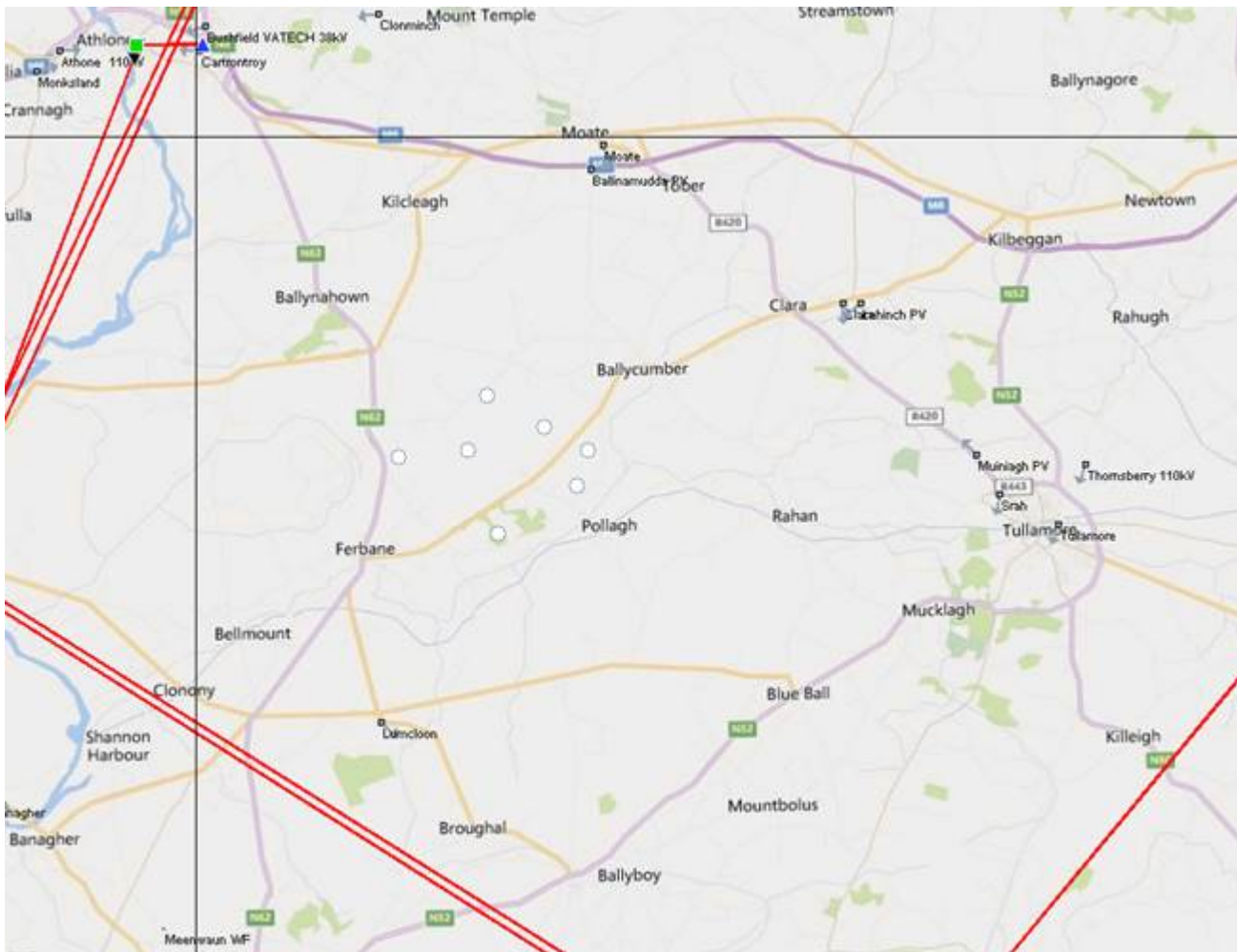
---

**From:** Myles Redmond <myles.redmond2@esb.ie>  
**Sent:** Friday 20 November 2020 18:41  
**To:** David Naughton  
**Cc:** Wilson Dalikeni  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm  
**Attachments:** ATT00001.txt; ATT00002.htm

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

Hi David,

I have carried out an impact analysis and I can confirm that this proposed development will have no impact to our Point to Point and Point to Multipoint radio Networks.



Regards,

Myles

---

**From:** David Naughton <[dnaughton@mkofireland.ie](mailto:dnaughton@mkofireland.ie)>  
**Sent:** Wednesday 11 November 2020 12:48  
**To:** Dalikeni. Wilson (ESB Networks) <[wilson.dalikeni@esb.ie](mailto:wilson.dalikeni@esb.ie)>

Cc: [dermot.hopkins@esbtelecoms.ie](mailto:dermot.hopkins@esbtelecoms.ie)

Subject: 200804 - Proposed Lemanaghan Wind Farm

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Hi Wilson,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if ESB has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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## Edel Mulholland

---

**From:** wfanalysis (ESB Networks) <wfanalysis@esb.ie>  
**Sent:** Tuesday 22 April 2025 11:37  
**To:** Susan Doran  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

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

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Good morning,

I am writing to inform you that we have successfully assessed your windfarm proposal. We are pleased to advise that the proposed wind farm has been reviewed and cleared.

We appreciate your patience during this assessment process. If you have any further questions, please feel free to reach out.

Regards,  
Abud

---

**From:** Susan Doran <sdoran@mkoireland.ie>  
**Sent:** Friday 14 March 2025 09:10  
**To:** wfanalysis (ESB Networks) <wfanalysis@esb.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Edel Mulholland <emulholland@mkoireland.ie>  
**Subject:** 200804 Lemanaghan Revised telecoms scoping

**CAUTION:** This message is from an EXTERNAL SENDER - be CAUTIOUS, Do NOT Click any links or Open any attachments if you were not expecting them.

Good afternoon,

We would like to follow up on a scoping exercise that was previously completed for Lemaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all ESB links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,

Susan

**Susan Doran**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
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\* \* \* \* \*

## David Naughton

---

**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Friday 7 May 2021 09:41  
**To:** David Naughton  
**Subject:** RE: 200804 - EIA Scoping Document for proposed Lemanaghan Wind Farm  
**Attachments:** Fáilte Ireland EIA Guidelines.pdf

Hello David,

Thank you for your email, letter and scoping document for a proposed wind farm development in Lemanaghan, Co. Offaly.

For your convenience I have attached the updated 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 (EIA), or those assessing EIAs, 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 EIA Guidelines outlined in section 2.

Regards,

Yvonne

### Yvonne Jackson

**Product Development-Environment & Planning Support** | Fáilte Ireland  
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**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Wednesday 5 May 2021 11:09  
**To:** planning applications <planning.applications@failteireland.ie>  
**Subject:** 200804 - EIA Scoping Document for proposed Lemanaghan Wind Farm

**[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 or Madam,

Please find attached a cover letter and Scoping Document for a proposed wind farm development in Lemanaghan and adjacent townlands in Co. Offaly.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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**Fáilte Ireland**  
National Tourism Development Authority

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



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## Contents

1. Introduction .....	1
2. Background to this Document.....	1
3. Legislation and Statutory Guidance .....	2
4. Assessing Tourism .....	4
5. Guiding Principles of EIAR .....	5
6. Consideration of Competency and Qualifications .....	5
7. EIAR Requirements.....	5
Population and Human Health .....	7
Biodiversity .....	7
Land, Soils and Geology .....	7
Water .....	8
Air Quality and Climate .....	8
Noise and Vibration.....	8
Material Assets; Traffic and Transport.....	8
Cultural Heritage .....	8
Archaeology .....	8
Material Assets; Waste Management.....	8
Material Assets .....	8
Landscape .....	8
8. Sources of information on Tourism.....	9
Information available online.....	9

## 1. Introduction

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

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

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

## 2. Background to this Document

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

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

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

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

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

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

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

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

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

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

#### ***Legislation***

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

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

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

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

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

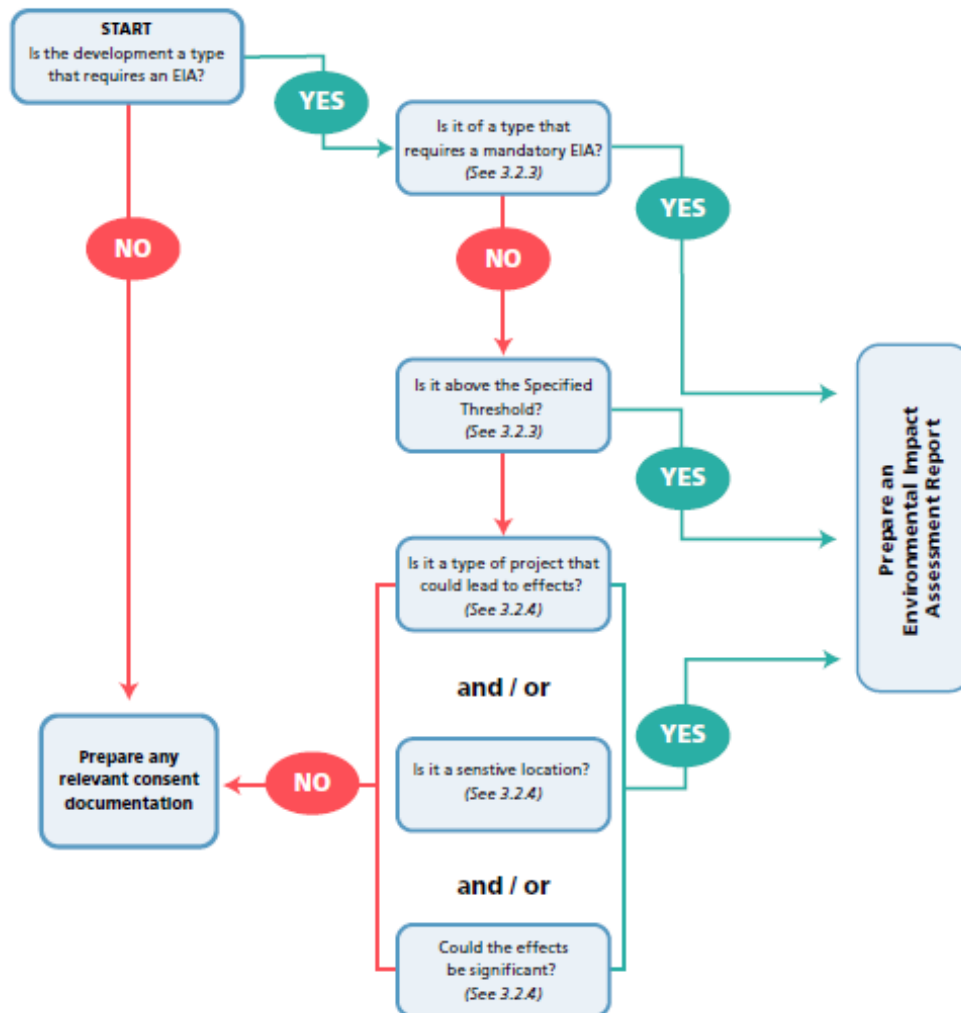
#### ***Screening***

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

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

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

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

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

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

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

## *EIAR Scoping*

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

### **4. Assessing Tourism**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## **7. EIAR Requirements**

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

- project description;
- assessment of alternatives considered;

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

### ***Project Description***

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

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

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

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

The assessment of alternatives is a requirement of EIAR

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

### ***Baseline Assessment***

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

For example, in a tourism context;

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

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

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

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

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

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

### ***Impact Assessment***

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

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

#### Population and Human Health

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

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

#### Biodiversity

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

#### Land, Soils and Geology

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

## Water

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

## Air Quality and Climate

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

## Noise and Vibration

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

## Material Assets; Traffic and Transport

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

## Cultural Heritage

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

## Archaeology

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

## Material Assets; Waste Management

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

## Material Assets

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

## Landscape

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

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

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

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

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

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

### ***Mitigation***

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

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

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

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

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

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

### ***Cumulative Impact***

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

### ***Transboundary Impact***

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

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

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

#### ***Fáilte Ireland***

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

### *Tourism Ireland*

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

### *Local Authorities*

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

### *Regional Authorities*

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

### *Central Statistics Office*

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

## Edel Mulholland

---

**From:** planning applications <planning.applications@failteireland.ie>  
**Sent:** Wednesday 6 November 2024 10:54  
**To:** Edel Mulholland  
**Subject:** Re: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Fáilte Ireland  
**Attachments:** Fáilte Ireland EIAR Guidelines 2023.pdf

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**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hello Edel,

Thank you for your email and revised 2024 Scoping Document for the proposed Lemanaghan Wind Farm.

Please see attached a copy of the updated Fáilte Ireland's Guidelines (2023) 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

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**From:** Edel Mulholland <emulholland@mkoireland.ie>

**Sent:** Wednesday 23 October 2024 14:21

**To:** planning applications <planning.applications@failteireland.ie>; Yvonne Jackson <yvonne.jackson@failteireland.ie>

**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>

**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Fáilte Ireland

**[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 Ms. Jackson,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with Fáilte Ireland in 2021, please see attached the previous thread of conversation between yourself and MKO in relation to scoping carried out in May 2021.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information, and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**

Graduate Environmental Scientist

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



July 2023

## Contents

1. Introduction .....	1
2. Background to this Document.....	1
3. Legislation and Statutory Guidance .....	2
4. Assessing Tourism .....	5
5. Guiding Principles of EIAR .....	6
6. Consideration of Competency and Qualifications .....	6
7. EIAR Requirements.....	6
Population and Human Health .....	8
Biodiversity .....	8
Land, Soils and Geology .....	9
Water .....	9
Air Quality and Climate .....	9
Noise and Vibration.....	9
Material Assets; Traffic and Transport.....	9
Cultural Heritage .....	10
Archaeology .....	10
Material Assets; Waste Management.....	10
Material Assets .....	10
Landscape .....	10
8. Sources of information on Tourism.....	12
Information available online.....	12

## 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.

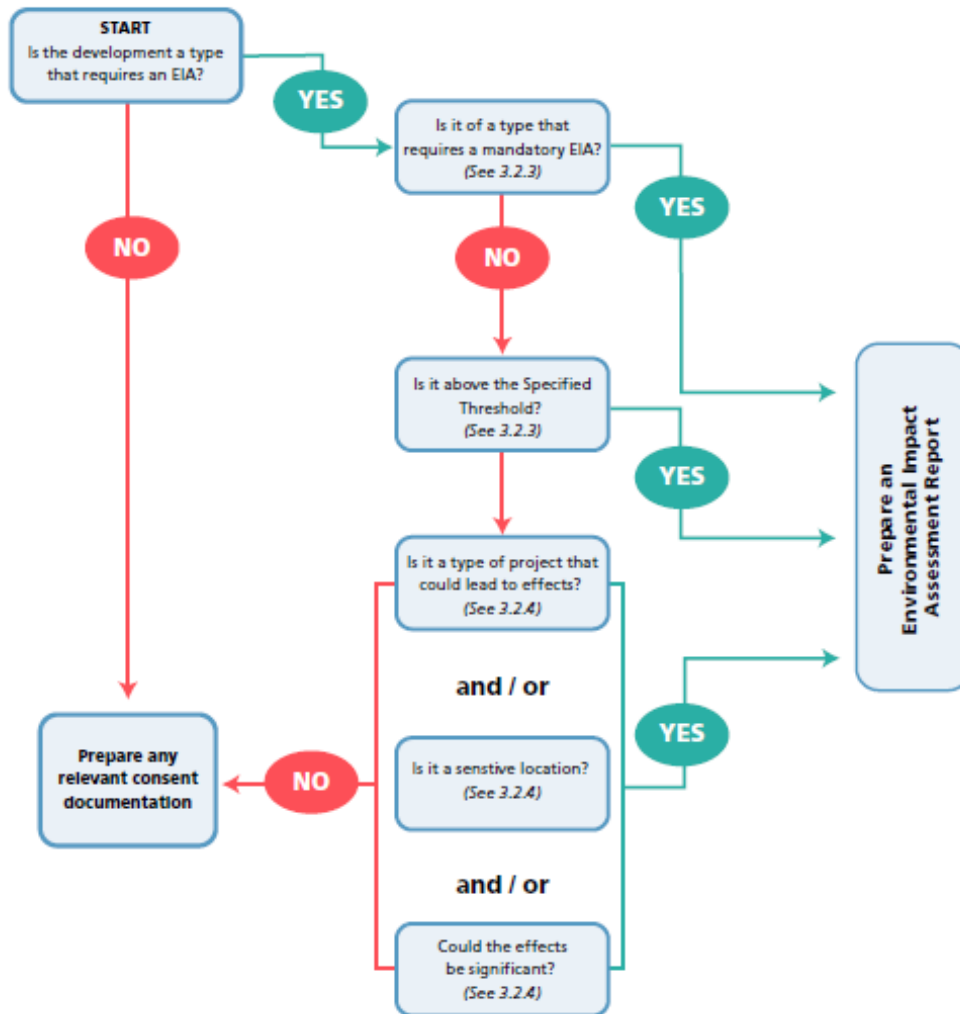
The process of EIA is set out in the EPA EIAR Guidelines, this document should be read in conjunction with and used as supplementary guidance to the EPA EIAR Guidelines. The process for ascertaining whether an EIAR is required is known as ‘screening’ and the process to determine the breadth and scope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

### **Screening**

Through 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.

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 geoh heritage 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.



David Naughton  
MKO - Planning & Environmental Consultants  
Tuam Rd  
Galway H91 VW84

21 May 2021

**Re: EIAR Scoping Document for proposed Lemanaghan Wind Farm, Co Offaly**  
**Your Ref: 200804**  
**Our Ref: 21/146**

Dear David,

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

With reference to your letter dated 04 May 2021, concerning the EIAR Scoping Document for proposed Lemanaghan Wind Farm, Co Offaly, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these datasets.

### **Geoheritage**

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

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

The audit for Co. Offaly was carried out 2016. The full report details can be found at [The Geological Heritage of Offaly](#). **Our records show that there is a CGS adjacent to the proposed wind farm area.**

**Clonmacnoise Esker**, Co. Offaly (GR 600870E 730650N), under IGH theme 'IGH7 Quaternary'. Link to site report at [OY008](#). The Clonmacnoise Esker and surrounding sands and gravels includes an exceptionally large accumulation of sands and gravels deposited both under the ice sheet and at its margin as the ice withdrew westwards across Offaly at the end of the last Ice Age.

With the current plan, there are no envisaged impacts on the integrity of current CGS by the proposed development. We ask that any proposed access roads or road upgrades and ancillary works associated with the proposed development do not impact on the esker or wider county geological site as shown on our maps. However, if the proposed development plan is altered, please contact Clare Glanville ([Clare.Glanville@gsi.ie](mailto:Clare.Glanville@gsi.ie)) for further information and possible mitigation measures if applicable.



### **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](http://gwlevel.ie))). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.

The Groundwater Data Viewer indicates a 'Locally Important Aquifer - Bedrock which is Moderately Productive only in Local Zones' and a 'Locally Important Aquifer - Bedrock which is Generally Moderately Productive' underlie the proposed wind farm. A 'Locally important gravel aquifer' is located adjacent to the wind farm boundary area. The Groundwater Vulnerability map indicates the area covered is variable. We would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and 'Rock at or near surface' in your assessments.

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

### **Geological Mapping**

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

### **Geotechnical Database Resources**

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

### **Geohazards**

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

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

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

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

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 wind farm 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 litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture ([Terra Soil](#)), waste soil characterisation ([Geochemically Appropriate Levels for Soil Recovery Facilities](#)) and mineral exploration ([Mineral Prospectivity Mapping](#)).

#### **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 Beatriz Mozo, Geological Mapping Unit, at [Beatriz.Mozo@gsi.ie](mailto:Beatriz.Mozo@gsi.ie), 01-678 2795.

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

Yours sincerely,

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

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



Edel Mulholland  
MKO  
Tuam Road  
Galway, H91 VW84

11 November 2024

**Re: EIAR Scoping Document for Proposed Lemanaghan Wind Farm**  
**Your Ref: 200804**  
**Our Ref: 24/385 [c.f. 21/146]**

Dear Edel,

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 interpretation and gather various data for that purpose. Please see our [website](#) for data availability.

With reference to your email received on the 23 October 2024, concerning the EIAR Scoping Document for Proposed Lemanaghan Wind Farm, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

For specific data available for Environmental Assessment and Planning topics please follow this link [[Data by Environmental Assessment and Planning Topic \(gsi.ie\)](#)], where you will find our data arranged by environmental assessment topic as illustrated below:

Land and soils	Water	Climate Change
<p><i>Soil</i></p> <ul style="list-style-type: none"> <li>• Subsoils (Quaternary Geology)</li> <li>• Tellus Geochemistry</li> <li>• Geotechnical</li> </ul> <p><i>Geology</i></p> <ul style="list-style-type: none"> <li>• Bedrock</li> <li>• Geophysics</li> <li>• Bedrock &amp; Quaternary 3D</li> </ul>	<p><i>Groundwater</i></p> <ul style="list-style-type: none"> <li>• Aquifers GW vulnerability, GWPSs (GWPPs)</li> </ul> <p><i>Surface water</i></p> <ul style="list-style-type: none"> <li>• Tellus Geochemistry</li> </ul> <p><i>Estuarine &amp; marine waters</i></p> <ul style="list-style-type: none"> <li>• Marine and coastal</li> </ul> <p><i>Flooding</i></p> <ul style="list-style-type: none"> <li>• GWClimate</li> <li>• Karst</li> </ul>	<p><i>Carbon accounting / Carbon balance</i></p> <ul style="list-style-type: none"> <li>• Geothermal</li> <li>• Carbon capture and storage</li> </ul> <p><i>Climate change trends</i></p> <ul style="list-style-type: none"> <li>• National coastal change assessment</li> </ul>
Cultural Heritage	Material Assets	The Landscape
<p><i>Archaeology</i></p> <ul style="list-style-type: none"> <li>• Cherish</li> </ul> <p><i>Underwater Archaeology</i></p> <ul style="list-style-type: none"> <li>• Shipwrecks</li> </ul>	<p><i>Built Services</i></p> <ul style="list-style-type: none"> <li>• Natural resources (Minerals &amp; Aggregates)</li> <li>• Active quarries</li> </ul>	<p><i>Landscape Appearance &amp; Character</i></p> <ul style="list-style-type: none"> <li>• Physiographic units</li> </ul> <p><i>Historical landscapes</i></p> <ul style="list-style-type: none"> <li>• Historic mines</li> </ul>
Other Relevant Data		
<p><i>Natural (Geo) hazards</i></p> <ul style="list-style-type: none"> <li>• Landslide Susceptibility Mapping</li> <li>• Groundwater flooding</li> <li>• Coastal vulnerability</li> <li>• Subsidence</li> <li>• Radon</li> </ul>	<p><i>Natural heritage</i></p> <ul style="list-style-type: none"> <li>• Geoheritage (County Geological Sites)</li> <li>• Dimension Stone/Stone Built Ireland</li> </ul>	



## **Geoheritage**

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

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

The audit for Co. Offaly was carried out 2016. The full report details can be found [here](#). **Our records show that there is a CGS at the margins of the proposed wind farm area.**

**Clonmacnoise Esker**, Co. Offaly (GR 600870E 730650N), under IGH theme 'IGH7 Quaternary'. The Clonmacnoise Esker and surrounding sands and gravels includes an exceptionally large accumulation of sands and gravels deposited both under the ice sheet and at its margin as the ice withdrew westwards across Offaly at the end of the last Ice Age. Link to site report at [OY008](#).

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## **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 redacted for confidentiality and 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>.

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

Yours sincerely,

Dr. Clare Glanville  
**Senior Geologist**  
**Geoheritage and Planning Programme**  
**Geological Survey Ireland**

Trish Smullen  
**Geologist**  
**Geoheritage and Planning Programme**  
**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 are 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 these data are a baseline or starting point for further site specific assessments.

## Edel Mulholland

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**From:** DECC Planning Notifications <PlanningNotifications@decc.gov.ie>  
**Sent:** Friday 15 November 2024 14:33  
**To:** Edel Mulholland  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - GSI  
**Attachments:** 2024-11-15 GSI Submissions.pdf

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

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Edel,

Please see attached a submission on behalf of Geological Survey Ireland (a division of the Department of the Environment, Climate and Communications) with regard to the subject entity.

Please send an acknowledgement of receipt to [PlanningNotifications@decc.gov.ie](mailto:PlanningNotifications@decc.gov.ie) at your earliest convenience.

Many thanks,  
Luke Thompson

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**Luke Thompson, Administrative Officer**  
*Planning Advisory Division*

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**An Roinn Comhshaoil, Aeráide agus Cumarsáide**  
*Department of the Environment, Climate and Communications*

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**Teach Tom Johnson, Bóthar Haddington, Baile Átha Cliath, D04 K7X4**  
*Tom Johnson House, Haddington Road, Dublin, D04 K7X4*

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[PlanningNotifications@decc.gov.ie](mailto:PlanningNotifications@decc.gov.ie)

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**From:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Sent:** Wednesday, October 23, 2024 2:22 PM  
**To:** John Butler (DECC) <[John.Butler@gsi.ie](mailto:John.Butler@gsi.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - GSI

**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,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with the Geological Survey of Ireland in 2021, please see attached the previous thread of conversation between yourself and MKO in relation to scoping carried out in May 2021.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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

Geological Survey Ireland Programme	Dataset	Relevant EIA Topic	Coverage	Description / Notes	Link to Geological Survey Ireland map viewer
Geohazards	Landslide: National landslide database and landslide susceptibility map	Land & Soil/Climate/Landscape	National	Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=b68cf1e4a9044a5981f950e9b9c5625c</a>
Geohazards	Groundwater Flooding (Historic)	Water	Regional	Provide information of historic flooding, both surface water and groundwater. [A lack of flooding presented in any specific location of the map only indicates that a flood has not been detected. It does not indicate that a flood cannot occur in that location at present or in the future]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Groundwater Flooding (Predictive)	Water	Regional	Provides information on the probability of future karst groundwater flooding (where available). [The maps do not, and are not intended to, constitute advice. Professional or specialist advice should be sought before taking, or refraining from, any action on the basis of the flood maps]	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=848f83c85799436b808652f9c735b1cc</a>
Geohazards	Radon Map	Land & Soils/Air	National		<a href="http://www.epa.ie/radiation/radonmap/">http://www.epa.ie/radiation/radonmap/</a>
Geoheritage	County Geological Sites as adopted by National Heritage Plan and listed in County Development Plans	Land & Soils/Landscape	Regional	All geological heritage sites identified by Geological Survey Ireland are categorised as CGS pending any further NHA designation by NPWS.	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0b2fbd2aaac3c228</a>
Geological Mapping	Bedrock geology:	Land & Soils	National	1:100,000 scale and associated memoirs.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0</a>
Geological Mapping	Bedrock geology:	Land & Soils	Regional	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0</a>
Geological Mapping	Quaternary geology: Sediments	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0</a>
Geological Mapping	Quaternary geology: Geomorphology	Land & Soils	National	1:50,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=de7012a99d2748ea9106e7e1b6ab8d58&amp;scale=0</a>
Geological Mapping	Physiographic units:	Land & Soils	National	Broad-scale physical landscape units mapped at 1:100,000 scale in order to be represented as a cartographic digital map at 1:250,000 scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=afa76a420f54877843aca1bc075c62b</a>
Geological Mapping	GeoUrban: Spatial geological data for the greater Dublin and Cork areas	Land & Soils	Regional	Includes 3D models	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c6093beb2212a850ce6&amp;scale=0">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9768f4818b794c6093beb2212a850ce6&amp;scale=0</a>
Geological Mapping	Geotechnical database	Land & Soils	National	Digitised geotechnical and Site Investigation Reports and boreholes which can be accessed through online downloads	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=a2718be1873d47a585a3f0415b4a724c</a>
Goldmine	Historical data sets including geological memoirs and 6" to 1 mile geological mapping records	Land & Soils/Water	National	available online	<a href="https://secure.dcaa.gov.ie/goldmine/index.html">https://secure.dcaa.gov.ie/goldmine/index.html</a>
Groundwater & Geothermal	Groundwater resources (aquifers)	Water	National	Data limited to 1:100,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater recharge.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale; long term annual average recharge	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater vulnerability.	Water	National	Data limited to 1:40,000 scale; sites should be investigated at local scale	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Group scheme and public supply source protection areas.	Water	National	Not all PWS / GWS have SPZ / ZOC. Check with IW / coco / NFGWS for private supplies.	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater Protection Schemes	Water	National	Data is limited to scale of 1:40,000. Data does not include all of the source protection areas	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Catchment and WFD management units.	Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	karst specific data layers	water	National	For areas underlain by limestone, includes karst features, tracer test database; turf/lough water levels (gwlevel.ie)	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Wells and Springs	Water	National	Not comprehensive, there may be unrecorded wells and springs	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=7e8a202301594687ab14629a10b748ef</a>
Groundwater & Geothermal	Groundwater body Descriptions	Water	National	Not exhaustive; only those in designated SACs; could be other GWDTEs; for more information contact NPWS / EPA / site investigations Also, Roadmap for a Policy and Regulatory Framework for Geothermal Energy, November 2020	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/groundwater-and-geothermal-unit/activities/understanding-ireland-groundwater/Pages/Groundwater-bodies.aspx</a>
Groundwater & Geothermal	Geothermal Suitability maps	Land & Soils/Water	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d0c0b9e">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=9eae46bee08de41278b90a9916d0c0b9e</a>
Marine & Coastal Unit	INFOMAR - Ireland's national marine mapping programme; providing key baseline data for Ireland's	Water	National		<a href="https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/">https://secure.dcaa.gov.ie/GSI/INFOMAR_VIEWER/</a>
Marine & Coastal Unit	CHERISH - Coastal change project (Climate, Heritage and Environments of Reefs, Islands, and Headlands)	Water	Regional		<a href="http://www.cherishproject.eu/en/">http://www.cherishproject.eu/en/</a>
Marine & Coastal Unit	Coastal Vulnerability Index (CVI).	water / Land & Soils	Regional	Currently the project is being carried out on the east coast and will be rolled out nationally	<a href="https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx">https://www.gsi.ie/en-ie/programmes-and-projects/marine-and-coastal-unit/projects/Pages/Coastal-Vulnerability-Index.aspx</a>
Minerals	Aggregate potential	Land & Soils/Material Assets	National	Consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process	<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Active quarries	Land & Soils	National		<a href="https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956">https://dcenr.maps.arcgis.com/apps/webappviewer/index.html?id=ee8c4c285a49413aa6f1344416dc9956</a>
Minerals	Historic mines	Land & Soils/Cultural Heritage	National	Inventory and Risk Classification 2009. Environmental Protection Agency, Economic Minerals Division and Geological Survey Ireland (DECC).	<a href="https://gis.epa.ie/EPAMaps/default?zesting=7&amp;northing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities">https://gis.epa.ie/EPAMaps/default?zesting=7&amp;northing=7&amp;lid=EPA:LEMA_Facilities_Extractive_Facilities</a> <a href="https://www.epa.ie/enforcement/mines/">https://www.epa.ie/enforcement/mines/</a>
Tellus	Geochemical data: multi-element data for shallow soil, stream sediment and stream water	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	Airborne geophysical data including radiometrics, electromagnetics and magnetics	Land & Soils	Regional	A national mapping programme	<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>
Tellus	urban geochemistry mapping (Dublin SURGE project).	Land & Soils	Regional		<a href="https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754">https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=6304e122b733498b99642707f72754</a>

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

## Edel Mulholland

---

**From:** Ross D'Arcy <ross@hiberniantowers.ie>  
**Sent:** Tuesday 25 March 2025 19:33  
**To:** Susan Doran  
**Cc:** Edel Mulholland; Catherine Johnson  
**Subject:** Re: 200804 - Lemanaghan WF Telecoms Scoping - Hibernian Towers

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

At this stage we don't envisage that we would have an objection to this project however if it moves to planning stage, we would have to do a thorough analysis and decide then whether we would object or not.

Kind Regards  
Ross

Ross D'Arcy  
Hibernian Towers  
4 Argyle Square,  
Morehampton Road,  
Donnybrook,  
Dublin 4.  
D04 HW97

Head Office: 0818 300 221

---

**From:** Susan Doran <sdoran@mkoireland.ie>  
**Date:** Wednesday 19 March 2025 at 14:49  
**To:** "ross@hiberniantowers.ie" <ross@hiberniantowers.ie>  
**Cc:** Edel Mulholland <emulholland@mkoireland.ie>, Catherine Johnson <cjohnson@mkoireland.ie>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Hibernian Towers

Hi there,

Can I please follow up on the below email regarding updated telecoms links?

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

---

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416 765



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**From:** Catherine Johnson <cjohnson@mkoireland.ie>

**Sent:** Friday 14 March 2025 09:41

**To:** ross@hiberniantowers.ie

**Cc:** Edel Mulholland <emulholland@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>

**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - Hibernian Towers

Good morning,

We are working on a constraints study for a proposed wind farm in Lemanaghan, Co. Offaly, located approximately 3km east of Ferbane and 7km west-southwest of Clara in Co. Offaly. We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of all Hibernian links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,

Catherine

**Catherine Johnson BSc. LL.M.**

Environmental Scientist

MKO

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

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Chomhshaoil  
Feidhmeannacht na Seirbhíse Sláinte,  
Urlár 2, Teach na Darach, Ascaill na Teile  
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services  
2nd Floor, Oak House, Lime Tree Avenue  
Millennium Park, Naas, Co. Kildare  
Eircode: W91KDC2

T: 045 880 442  
ehnationaloffice@hse.ie

### **HSE EIA Scoping**

#### **Environmental Health Service Submission Report**

**Date:** 31.5.21

**Our reference:** EHIS 1781

**Report to:** Mr David Naughton, MKO, Tuam Road, Galway

**Consultant's reference:** 200804

**Type of Consultation:** EIA Scoping

**Proposed development:** Proposed Lemanaghan Wind Farm, Co. Offaly

**Applicant:** Bord na Mona Powergen Ltd

The following HSE departments were made aware of the consultation request for the proposed development on 5.5.21-

- Emergency Planning – Brendan Lawlor
- Estates – Helen Maher

- Assistant National Director for Health Protection – Kevin Kelleher /Laura Murphy
- CHO – Pat Bennett

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

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

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

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

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

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

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

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

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

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

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

The HSE will consider the final EIAR accompanying the planning application and will make comments to the relevant planning authority on the methodology used for assessing the likely significant impacts and the evaluation criteria used in assessing the significance of the impact.

This report only comments on Environmental Health Impacts of the proposed development. It is based on an assessment of the correspondence submitted to this office dated 4<sup>th</sup> May 2021.

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

- Public Consultation
- Decommissioning phase
- Siting and location of turbines
- Opportunity for Health Gain
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Geological Impacts
- Ancillary facilities and cumulative impacts

#### Public Consultation

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

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

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

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

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

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

### **Decommissioning Phase**

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

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

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

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

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

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

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

### **Opportunity for Health Gain**

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

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

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

### **Noise & Vibration**

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

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

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

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

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

### **Shadow Flicker**

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

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

### **Air Quality**

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

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

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

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

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

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

### **Geological impacts**

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

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

### **Ancillary Facilities**

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

### **Cumulative Impacts**

It is noted from the information provided in the Scoping document that, should the proposed Lemanaghan Wind Farm be granted planning permission, there will be between 49 and 53 wind turbines within 20km of the proposed site. The cumulative impact on sensitive receptors of the proposed wind farm when considered with other wind farms in the vicinity should be addressed in the EIAR

The location and number of turbines in existing or proposed wind farm developments in the vicinity should be clearly identified in the EIAR.

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

A handwritten signature in black ink that reads "Caroline Hueston". The signature is written in a cursive style with a large initial 'C'.

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

## Edel Mulholland

---

**From:** Andrew Sulley <Andrew.Sulley@hse.ie>  
**Sent:** Wednesday 4 December 2024 13:29  
**To:** Edel Mulholland  
**Subject:** Scoping EIA for Lemanaghan Wind Farm Offaly HSE Observations  
**Attachments:** Proposed Lemanaghan Wind Scoping EIA HSE Observations (4312).pdf

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

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

**FAO: Edel Mulholland**

Graduate Environmental Scientist  
McCarthy Keville O'Sullivan Ltd  
E-mail: emulholland@mkoireland.ie

Your ref:

Client: Lemanaghan Wind Farm DAC  
Project Title: Proposed Lemanaghan Wind  
Farm, Co. Offaly

Project Number: 200804  
Document Title: EIAR Scoping Document  
Document File Name: Revised EIAR Scoping Doc – F –  
2024.10.22- 200804

Please find observations of the HSE National Environmental Health Service on the scoping of the EIA for the above project.

Could we put on record that any formal consultation in the planning process with the HSE should always be addressed to National Environmental Health Service at: [environmental.health@hse.ie](mailto:environmental.health@hse.ie)  
This will ensure any stakeholders in the HSE are informed of the consultation. This should include notification of applications made directly to An Bord Pleannala.

Regards,

Andrew Sulley

Oifigeach Sláinte Comhshaoil Sinsearach/Senior Environmental Health Officer  
Timpeallacht Athrú Aeráide Aonad Tacaíochta Líonra/Environment Climate Change Network Support Unit

Seirbhís Náisiúnta Sláinte Comhshaoil, FSS/ National Environmental Health Service, HSE  
Holland, Páirc Theicneolaíochta Plassey, Luimneach/ Holland Road, Plassey Technological Park, Limerick



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"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil . Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúil don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig [service.desk@hse.ie](mailto:service.desk@hse.ie) agus ansin glan an ríomhphost seo ded' chóras."

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Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services  
2nd Floor, Oak House, Lime Tree Avenue  
Millennium Park, Naas, Co. Kildare  
Eircode: W91KDC2

FAO: **Edel Mulholland**

Graduate Environmental Scientist  
McCarthy Keville O'Sullivan Ltd  
E-mail: emulholland@mkoireland.ie

Your ref:

Client: Lemanaghan Wind Farm DAC

Project Title: Proposed Lemanaghan Wind  
Farm, Co. Offaly

Project Number: 200804

Document Title: EIAR Scoping Document

Document File Name: Revised EIAR Scoping Doc – F –  
2024.10.22- 200804

## HSE EIA Scoping

### National Environmental Health Service Submission Report

**Date:** 2<sup>nd</sup> December 2024

**Our reference:** EHIS ID4312

**Report to:** Edel Mulholland

**Type of Consultation:** EIA Scoping

#### **Proposed development:**

Lemanaghan Wind Farm, Co. Offaly

The following HSE stakeholders were consulted on the scoping on the 24<sup>th</sup> October 2024:

- Emergency Planning
- National Capital Estates Office
- Director of National Health Protection
- REO Dublin and Midlands

Clarification on the content of this submission should be made, in the first instance, to [Andrew.sulley@hse.ie](mailto:Andrew.sulley@hse.ie)

### **General Introduction**

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

- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

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

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

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

Adoption of the Directive (2014/52/EU) in April 2014 initiated a review of the National Guidance for EIA and the EIAR accompanying a planning application. New guidelines can be seen at:

<https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-the-information-to-be-contained-in-environmental-impact-assessment.php>

The introduction of the new Guidance is supported by a Webinar produced by the EPA and can be found at:

<https://www.youtube.com/embed/ejKVFUztXBY>

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

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

- a) Description of the receiving environment;
- b) The nature and scale of the impact;
- c) An assessment of the significance of the impact;

- d) Proposed mitigation measures;
- e) Residual impacts.

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

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

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

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

- Public Consultation
- Decommissioning phase of the proposed wind farm
- Siting and location of turbines
- Noise & Vibration
- Shadow Flicker
- Air Quality
- Surface and Groundwater Quality
- Geological Impacts
- Ancillary facilities
- Cumulative impacts

### **Public Consultation**

It is recommend that early and meaningful public consultation with the local community is undertaken to ensure all potentially significant impacts of the proposed windfarm development have been adequately addressed.

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

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

The National Environmental Health Service expects that meaningful public consultation, where the local community is fully informed of the proposed development, will be undertaken. Members of the public should be given sufficient opportunity to express their views on the proposed windfarm development.

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

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

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

### **Decommissioning**

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

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

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

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

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

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

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

## **Assessment of Consideration of Alternatives**

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

## **Noise & Vibration**

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

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

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

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

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

## **Shadow Flicker**

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

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

## **Air Quality**

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

- Sweeping of hard road surfaces
- Provision of a water bowser on site, regular spraying of haul roads

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

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

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

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

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

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

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

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

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

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

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

### **Ancillary Facilities**

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

### **Cumulative Impacts**

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

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



Andrew Sulley  
Senior Environmental Health Officer

## David Naughton

---

**From:** Paul Brunel <Paul.Brunel@imgainegroup.ie>  
**Sent:** Monday 16 November 2020 10:10  
**To:** David Naughton  
**Cc:** Lorna Brennan; Ronnie O'Neill  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,  
Based on the map provided the proposed Wind Farm will not impact the existing Imagine network.  
Regards,

**Paul Brunel.**  
**Microwave Transmission Planner,**  
**Imagine Lte.**

**m.** 086 388 1962  
**e.** [Paul.Brunel@imgainegroup.ie](mailto:Paul.Brunel@imgainegroup.ie) | **w.** <http://www.imagine.ie/>

**Imagine Network Services Ltd.**  
Unit 6, Sandyford Business Centre.  
Blackthorn Road, Dublin 18, Ireland



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**From:** Ronnie O'Neill <Ronnie.ONeill@imgainegroup.ie>  
**Sent:** 11 November 2020 14:39  
**To:** [dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie); Paul Brunel <Paul.Brunel@imgainegroup.ie>  
**Cc:** Lorna Brennan <lorna.brennan@imgainegroup.ie>  
**Subject:** FW: 200804 - Proposed Lemanaghan Wind Farm

Hi Paul ,

Can you check this out when you get a chance please .

Ronnie .

---

**From:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Sent:** Wednesday 11 November 2020 14:28  
**To:** Ronnie O'Neill <[Ronnie.ONeill@imgainegroup.ie](mailto:Ronnie.ONeill@imgainegroup.ie)>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Ronnie,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Imagine has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**  
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MKO – Planning & Environmental Consultants  
Tuam Road  
Galway  
H91 VW84



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

14.06.2021

**Re. Consultation Request for Proposed Wind Farm Development at Lemanaghan Bog, Ferbane, Co. Offaly**

Dear David

Thank you for your letter dated May 4th regarding a request for consultation on the proposed Lemanaghan Windfarm.

Please find below our initial concerns and recommendations in relation to this development. Our main concerns in relation to this development will be the protection of the aquatic resource and the associated riparian habitat. In particular the protection of streams such as the Lemanaghan and Castlearmstrong streams that cross or bound the proposed site and which feed into the Brosna river.

1. All watercourses that will receive drainage from the construction sites of the turbines or the access roads must be assessed in terms of aquatic biodiversity with particular emphasis on fish, the food of fish, spawning grounds and fish habitat in general. Changes to river morphology should be avoided.
2. The aquatic habitat and physical nature of any watercourse affected by the development must be fully described in detail. This includes areas of open water, pool riffle glide sequences, density and types of aquatic vegetation, description of riparian zones to depth of at least 10 metres on either bank etc. The extent of the surveys should be sufficiently long enough so as to be representative of the habitat contained in that watercourse. There should be a particular focus on sections upstream and downstream of any point where an impact on the watercourse is likely to arise. It may be appropriate to survey a tributary stream and the larger, more important streams it joins, and assess the effect the discharge might further have on biodiversity and fisheries in the larger streams. Surveys of un-impacted (control) streams should also be included in the Environmental Impact Assessment.
3. We are concerned about soils, their structure and types around all the turbines, turbine pads, associated access roads and site development. In particular we have concerns about the stability of the soils and the impact that works on both the turbines and access roads may have either directly or by vibration on the stability of the soils. IFI are particularly concerned where it is proposed to construct wind turbines on peat soils especially if these peat soils.
4. IFI strongly recommends that specialist personnel are employed to assess soil strength and suitability of the ground at each site and along any proposed access road. This is particularly important in relation to peat soils.



5. From our experience we will have serious difficulties with developments on peat soils where there is excessive slope and/or where the peat depth exceeds one metre. The potential for soil movement and landslides should be assessed fully within the EIS.
6. Particular attention should be paid to the hydrology of any site where excavations, including excavations for road construction are being undertaken. It is important that natural flow paths are not interrupted or diverted in such a manner as to give rise to erosion or instability of soils caused by an alteration in water movement either above or below ground.
7. Attention should be paid to drainage during both the construction phase and the operational phase. This includes waters being pumped from foundations or other excavations. It is particularly important during the construction phase that sufficient retention time is available in any settlement pond to ensure no deleterious matter is discharged to waters. We strongly recommend that settlement ponds are maintained, where appropriate, during the operational phase to allow for the adequate settlement of suspended solids and sediments and prevent any deleterious matter from discharging. In constructing and designing silt traps particular attention should be paid to rainfall levels and intensity. The silt traps should be designed to minimise the movement of silt during intense precipitation events where the trap may become hydraulically overloaded. It is essential that they are located with good access to facilitate monitoring sampling and maintenance. A license to discharge to waters may be required from the local authority.
8. Consideration must be given to the disposal of waste materials such that they will not give rise to discharges to waters. In terms of risk, the placing of soils on watercourse-adjacent ground should not be permitted unless the area has been the subject of a risk assessment. This is of particular concern where peat soils are encountered. Furthermore drainage from disturbed and stockpiled soils will have to be considered in advance. It may be necessary to carry out soil stockpiling operations in confined areas only and to ensure vegetation/covering of the soils to prevent wash-out.
9. Details in relation to site offices and the services necessary for the site offices should form part of the EIA. In addition, details relating to operations during the construction phase to contain pollutants should also be considered. It should be noted that cement leachate, hydrocarbon oils and other toxic poisonous materials will require full containment and should not be permitted to discharge to any waters. Please note that physical pollution of watercourses in terms of dumping of unsuitable gravel material or other construction debris in or stockpiling such materials near watercourses is not acceptable as this will interfere with the aquatic habitat.
10. The use of sedimentary rocks, such as shale, in road construction should be avoided. This type of material has poor tensile strength and is liable to be crushed by heavy vehicles thereby releasing fine sediment materials into the drainage system which are difficult to precipitate and may give rise to water pollution. We recommend that specialist expertise should advise on the type of material required for road construction bearing in mind the pressures that will arise during the construction phase and the necessity to avoid pollution due to fines washing out into the roadside drainage.



**Iascach Intíre Éireann  
Inland Fisheries Ireland**

11. In relation to watercourse crossings for the road or grid connection please be advised that IFI will require to be consulted well in advance in relation to all watercourse crossings or the use of any temporary diversions. We strongly recommend that these crossings should be kept to a minimum. We will also require that any instream structures or bridge crossings are approved by the IFI. In designing crossings, the length, slope and width of any instream structure will be important. Clear span bridges are the preferred option for all crossings especially in upland areas.
12. Please also note that any instream works or other works which may impact directly on a watercourse should only be carried out during the open season which is from 1<sup>st</sup> July to 30<sup>th</sup> of September in each year (so as to avoid impacting on the aquatic habitat during the spawning season.) It would be important that appropriate scheduling of works is allowed for.
13. The EIAR should indicate proposals to monitor the impact on watercourses within the site. In the event that environmental damage to the aquatic habitat and associated riparian zone is caused, the EIAR should indicate the steps that may be taken to rectify any damage to the aquatic habitat including liaison with the appropriate authorities.
14. In relation to wind farm structures and infrastructure it is important that a sufficient bank side riparian zone is maintained to absorb and attenuate overland flows.

The discharge of polluting or deleterious matter to any watercourse except under and in accordance with a licence may be an offence under the Fisheries Acts and/or under the Water Pollution Acts.

Should works be approved a finalised CEMP must be agreed with Inland Fisheries Ireland before works commence.

Should you require any further information or clarification from IFI, please do not hesitate to contact me.

Yours sincerely,

*Jane Gilleran*

.....  
Jane Gilleran  
Fisheries Environmental Officer  
Inland Fisheries Ireland - Limerick



**Iascach Iníre Éireann**  
**Inland Fisheries Ireland**



## David Naughton

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**From:** RAFFERTY Audrey <audrey.rafferty@iaa.ie>  
**Sent:** Tuesday 25 May 2021 16:58  
**To:** David Naughton  
**Subject:** Proposed Lemanaghan Wind Farm in Lemanaghan and surrounding townlands Co. Offaly. Ref: 200804

Dear Mr Naughton

Thank you for your letter and request for comments for the preliminary environmental impact assessment for the proposed windfarm to be located in Lemanaghan, Co Offaly.

As the number of proposed turbines, the blade tip height and elevations of each turbine and the layout is not provided, Safety Regulation Division - Aerodromes cannot make any specific comments at this time.

The development appears to be approximately 29kms North East of Birr Airport and 40km North West of Clonbullogue Airport.

As such, it is likely that the following general observations would be proffered during a formal planning process: In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:

- (1) agree an aeronautical obstacle warning light scheme for the wind farm development,
- (2) provide as-constructed coordinates in WGS84 format together with above mean sea level tip height elevations at each wind turbine location

<i>Turbine No.</i>	<i>WGS-84 Co-ordinates</i>	<i>Ground elevation (Malin Head OD)</i>	<i>Blade tip elevation of turbine (Malin Head OD)</i>	<i>Height of turbine (height from ground level to blade tip)</i>	<i>Confirm if turbine has obstacle lighting.</i>
T1	53.346125, -6.258288	75m	225m	150m	No

- (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection.

Kind Regards

Audrey Rafferty  
Corporate Affairs  
Irish Aviation Authority  
11-12 Dolier Street  
Dublin 2  
01 603 1103



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## Edel Mulholland

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**From:** Planning <planning@iaa.ie>  
**Sent:** Friday 22 November 2024 14:33  
**To:** Edel Mulholland  
**Cc:** Catherine Johnson; Ellen Costello; Susan Doran; Planning  
**Subject:** RE: 200808 -EIAR Scoping Document for Proposed Lemanaghan Wind Farm - IAA

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Edel,

Thank you for your email and forwarding the EIAR Scoping Report for the proposed Lemanaghan Wind Farm, to be located in Co Offaly.

For future reference, please forward any planning related queries to [planning@iaa.ie](mailto:planning@iaa.ie)

Based on the information provided at this stage, the Authority has no specific requirements for incorporation into the EIAR Scoping Report.

Should a formal planning application be submitted, the Irish Aviation Authority will likely offer the following general observations:

*"In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to:*

- (1) agree an aeronautical obstacle warning light scheme for the wind turbine development,*
- (2) provide as-constructed coordinates in WGS84 format together with ground and tip height elevations at each wind turbine location and*
- (3) notify the Authority of intention to commence crane operations with at least 30 days prior notification of their erection."*

Kind regards,

Dave

The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449



IRISH AVIATION AUTHORITY  
ÚDARÁS EITLÍOCHTA NA HÉIREANN

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**From:** Edel Mulholland <emulholland@mkoireland.ie>  
**Sent:** Thursday, November 21, 2024 2:20 PM  
**To:** audrey.rafferty@iaa.ie; Planning <planning@iaa.ie>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>  
**Subject:** RE: 200808 -EIAR Scoping Document for Proposed Lemanaghan Wind Farm - IAA

**\* This message originated from outside the Irish Aviation Authority. Please treat hyperlinks, attachments and instructions in this email with caution. \***

Dear Ms. Rafferty,

Just wanted to follow up on the below scoping exercise with regards to the Proposed Lemanaghan Wind Farm in County Offaly. Please see attached the Scoping document that was sent to you on the 23<sup>rd</sup> of October 2024.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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**From:** Edel Mulholland  
**Sent:** Wednesday 23 October 2024 14:24  
**To:** [audrey.rafferty@iaa.ie](mailto:audrey.rafferty@iaa.ie); [planning@iaa.ie](mailto:planning@iaa.ie)  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200808 -EIAR Scoping Document for Proposed Lemanaghan Wind Farm - IAA

Dear Ms. Rafferty,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with the Irish Aviation Authority in 2021, please see attached the previous thread of conversation between yourself and MKO in relation to scoping carried out in May 2021.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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## Edel Mulholland

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**From:** Kelly HAYDEN <Kelly.Hayden@IAA.ie>  
**Sent:** Wednesday 19 March 2025 16:31  
**To:** Catherine Johnson  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - IAA

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Catherine,

From an aviation perspective, the Air Navigation Service Provider AirNav Ireland is responsible for the safeguarding of en-route communications, navigation and surveillance infrastructure within the state.

As such I would recommend that you engage with AirNav Ireland in relation to any proposed renewable energy development within the proposed location.

Relevant contact details are provided below:

[Planning@airnav.ie](mailto:Planning@airnav.ie)

Kind Regards,

**Kelly Hayden**

Aviation Officer | Personnel Licensing Section

E: [kelly.hayden@iaa.ie](mailto:kelly.hayden@iaa.ie) | [www.iaa.ie](http://www.iaa.ie) |

The Times Building, 11-12 D'Olier Street, Dublin 2, D02 T449

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**\*\*\* MySRS is currently used for invoicing/billing purposes only\*\*\***



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**From:** Catherine Johnson <cjohnson@mkoireland.ie>  
**Sent:** Friday, March 14, 2025 9:22 AM  
**To:** ATC Licensing <ATC.Licensing@IAA.ie>; Christophe O'BRIEN <Christophe.OBRIEN@IAA.ie>

Cc: Edel Mulholland <emulholland@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>; Planning <planning@airnav.ie>

Subject: 200804 - Lemanaghan WF Telecoms Scoping - IAA

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Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design. Apologies but the previous correspondence on this project is no longer available on our side to share.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of all IAA links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

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



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=====

## Edel Mulholland

---

**From:** Thomas Quigley <Thomas.Quigley@irishrail.ie>  
**Sent:** Tuesday 18 March 2025 14:13  
**To:** Catherine Johnson  
**Cc:** Edel Mulholland; Susan Doran; Peter Cunningham  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Irish Rail

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

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Hi,

We have antenna's at:

OBA58: 53.334051, -7.687193

Clonydonnin: 53.356351, -7.794779

Below screen capture shows the proposed Windfarm development in relation to our GSM-R Towers:



Regards,

Thomas Quigley,  
National Telecoms Manager,  
SET Department

T +353 1 703 4944 M +353 87 7992943 E [thomas.quigley@irishrail.ie](mailto:thomas.quigley@irishrail.ie) W [www.irishrail.ie](http://www.irishrail.ie)



---

**From:** Catherine Johnson <cjohnson@mkoireland.ie>  
**Sent:** Friday 14 March 2025 11:53  
**To:** Thomas Quigley <Thomas.Quigley@irishrail.ie>  
**Cc:** Edel Mulholland <emulholland@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>; Peter Cunningham <Peter.Cunningham@cie.ie>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Irish Rail

**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.

Hi Thomas,

Thank you for sending on, would it be possible to send on the location of this antenna?

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

---

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---

**From:** Thomas Quigley <Thomas.Quigley@irishrail.ie>  
**Sent:** Friday 14 March 2025 10:29  
**To:** Catherine Johnson <cjohnson@mkoireland.ie>  
**Cc:** Edel Mulholland <emulholland@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>; Peter Cunningham <Peter.Cunningham@cie.ie>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Irish Rail

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Hi Catherine,

The proposed site lies inside the GSM-R (Mobile Network for Railways) exclusion zone. Please see below:

From a study carried out by the ANFR (Agence Nationale des Frequences in France), the output calls for 2 main recommendations by defining 2 main zones as follows:

- 1- **Exclusion zone:** wind farm not less than 5 Km from antenna
- 2- **Coordination zone:** : 5Km<wind farm <30Km: this area, coordination between operators is required to fix any issue and impact on the signal propagation

Regards,

Thomas Quigley,  
National Telecoms Manager,  
SET Department  
T +353 1 703 4944 M +353 87 7992943 E [thomas.quigley@irishrail.ie](mailto:thomas.quigley@irishrail.ie) W [www.irishrail.ie](http://www.irishrail.ie)



please don't print this e-mail unless you really need to

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**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:25  
**To:** Thomas Quigley <[Thomas.Quigley@irishrail.ie](mailto:Thomas.Quigley@irishrail.ie)>  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - Irish Rail

**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.

Dear Mr. Quigley

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design. Apologies but our previous correspondence is no longer available.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please note, MKO are aware that you may no longer be the appropriate person to be sending these emails to and our apologies for the continued correspondence. We have reached out to Comreg to try and identify a different point of contact but are still waiting to hear back. If you are not the appropriate person to be sending this to if you could please send this on to your relevant colleagues in Irish Rail or let us know who the best point of contact would be it would be much appreciated.

Could you please provide the start and end point (ITM) of all Irish Rail links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

---

**MKO**

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## Edel Mulholland

---

**From:** IWT Info <info@iwt.ie>  
**Sent:** Wednesday 23 October 2024 16:00  
**To:** Edel Mulholland  
**Subject:** Re: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Irish Wildlife Trust

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Dear Edel,

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 Wed, 23 Oct 2024 at 14:27, Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)> wrote:

Dear Sir/ Madam,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with Irish Wildlife Trust in May 2021 via a scoping letter sent over email. Please see this cover letter attached for clarity.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information, and comments are captured from relevant

consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,

Edel.

**Edel Mulholland**

Graduate Environmental Scientist

**MKO**

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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)

**From:** [Jimmy Sugrue](#)  
**Sent:** Friday 14 March 2025 10:06  
**To:** [Catherine Johnson](#)  
**Cc:** [Edel Mulholland](#); [Susan Doran](#)  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Ivertec Ltd

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Please note this development does not affect our network/infrastructure.

Regards,  
Jimmy Sugrue.

---

**From:** Catherine Johnson  
**Sent:** Friday 14 March 2025 09:25  
**To:** Jimmy Sugrue  
**Cc:** Edel Mulholland ; Susan Doran  
**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - Ivertec Ltd

Good morning,

We are working on a constraints study for a proposed wind farm in Lemanaghan, Co. Offaly, located approximately 3km east of Ferbane and 7km west-southwest of Clara in Co. Offaly. We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of all Ivertec links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LLM.**  
Environmental Scientist

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## Edel Mulholland

---

**From:** Sarah Broughall <sarah@whizzyinternet.ie>  
**Sent:** Wednesday 19 March 2025 09:45  
**To:** Catherine Johnson  
**Subject:** Re: 200804 - Lemanaghan WF Telecoms Scoping - JS Whizzy Internet Ltd

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Catherine,

Just to confirm we have no links in this area.

Best regards,  
Sarah.

On Fri, Mar 14, 2025 at 9:24 AM Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)> wrote:

Good morning,

We are working on a constraints study for a proposed wind farm in Lemanaghan, Co. Offaly, located approximately 3km east of Ferbane and 7km west-southwest of Clara in Co. Offaly. We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of any JS Whizzy Internet links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,

Catherine

**From:** [John Barry](#)  
**Sent:** Friday 14 March 2025 10:14  
**To:** [Catherine Johnson](#)  
**Cc:** [Edel Mulholland](#); [Susan Doran](#)  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Lackabeha Services Ltd T/A Airwaves Internet

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

No infrastructure in this area

-----  
John Barry  
Airwave Internet  
e: [john@airwave.ie](mailto:john@airwave.ie)  
p: 021-2024000  
m: 087-9471657

---

**From:** Catherine Johnson  
**Sent:** Friday 14 March 2025 09:24  
**To:** John Barry  
**Cc:** Edel Mulholland ; Susan Doran  
**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - Lackabeha Services Ltd T/A Airwaves Internet

Good morning,

We are working on a constraints study for a proposed wind farm in Lemanaghan, Co. Offaly, located approximately 3km east of Ferbane and 7km west-southwest of Clara in Co. Offaly. We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of any Lackabeha links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LLM.**  
Environmental Scientist

---

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**Catherine Johnson BSc. LLM.**

Environmental Scientist

**MKO**

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## David Naughton

---

**From:** Dominic Crudden <dominic.crudden@emrsolutions.ie>  
**Sent:** Friday 13 November 2020 11:12  
**To:** David Naughton  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

EMR Integrated Solutions have assessed this proposal and do not have any issue with it as it would not have an adverse impact on any of our telecommunications links.

Regards,

**Dominic Crudden**  
Business Development



Mobile: +353 (86) 7712819  
Office: +353 (1) 8013131  
Fax: +353 (1) 8013166  
Email: [dominic.crudden@emrsolutions.ie](mailto:dominic.crudden@emrsolutions.ie)  
Website: <https://emr.ie/>



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**From:** David Naughton [<mailto:dnaughton@mkoireland.ie>]  
**Sent:** Wednesday 11 November 2020 15:25  
**To:** Dominic Crudden <dominic.crudden@emrsolutions.ie>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Dominic,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if MP&E has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**  
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Ireland, H91 VW84  
+353 (0) 91 735611  
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## Edel Mulholland

---

**From:** Dominic Crudden <dominic.crudden@emrsolutions.com>  
**Sent:** Tuesday 18 March 2025 15:39  
**To:** Susan Doran; Catherine Johnson  
**Cc:** Edel Mulholland  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - EMR Solutions

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Hi Susan,

The proposed turbine locations will not cause an issue to any of the links that we're aware of. Please let us know if the turbine layout changes.

Regards,

**Dominic Crudden**  
Business Development Manager  
at EMR Integrated Solutions



---

**From:** Susan Doran <sdoran@mkoireland.ie>  
**Sent:** Tuesday 18 March 2025 12:23  
**To:** Dominic Crudden <dominic.crudden@emrsolutions.com>; Catherine Johnson <cjohnson@mkoireland.ie>  
**Cc:** Edel Mulholland <emulholland@mkoireland.ie>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - EMR Solutions

Hi Dominic,

Please find the Turbine Layout attached.

Should you come across any issues, please let me know!

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

---

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

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---

**From:** Dominic Crudden <[dominic.crudden@emrsolutions.com](mailto:dominic.crudden@emrsolutions.com)>  
**Sent:** Tuesday 18 March 2025 11:29  
**To:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - EMR Solutions

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Hi Catherine,

EMR do not have any links in the area, but we are working on a project for the Defence Forces which includes a link which will be close to the site.

Can you send the turbine layout please?

Regards,

**Dominic Crudden**  
Business Development Manager  
at EMR Integrated Solutions



---

**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:22  
**To:** Dominic Crudden <[dominic.crudden@emrsolutions.com](mailto:dominic.crudden@emrsolutions.com)>  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - EMR Solutions

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

Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all EMR links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

---

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## Edel Mulholland

---

**From:** Brian Dunne | National Broadband Ireland <Brian.Dunne@nbi.ie>  
**Sent:** Monday 24 March 2025 12:25  
**To:** Susan Doran; Catherine Johnson  
**Cc:** Edel Mulholland; Radiolinks  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - NBI Infrastructure DAC

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Susan, Catherine,

NBI have completed our analysis, and we are not operating or have any current plans to operate radio links within 5km of, or through the proposed area.

Therefore, NBI have no concerns regarding these wind farm plans.

Best regards,  
Brian



**Brian Dunne**  
Network Engineer - Radio  
Access and Microwave  
Backhaul

---

[brian.dunne@nbi.ie](mailto:brian.dunne@nbi.ie)

+353 85 748 1592

3009 Lake Drive, Citywest,  
Dublin 24, D24 H6RR

[WWW.NBI.IE](http://WWW.NBI.IE)

---

Internal All Users

**From:** Susan Doran <sdoran@mkoireland.ie>  
**Sent:** 19 March 2025 14:52  
**To:** Catherine Johnson <cjohnson@mkoireland.ie>; Radiolinks <radiolinks@nbi.ie>  
**Cc:** Edel Mulholland <emulholland@mkoireland.ie>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - NBI Infrastructure DAC

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Hi there,

Can I please follow up on the below email regarding updated telecoms links?

Kind regards,

Susan

**Susan Doran**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416 765



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---

**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:24  
**To:** [radiolinks@nbi.ie](mailto:radiolinks@nbi.ie)  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - NBI Infrastructure DAC

Good morning,

We are working on a constraints study for a proposed wind farm in Lemanaghan, Co. Offaly, located approximately 3km east of Ferbane and 7km west-southwest of Clara in Co. Offaly. We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of any NBI links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

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



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**From:** [Olivia Hughes](#)  
**To:** [EIAPlanning](#)  
**Subject:** Scoping Consultation under Article 5(2) of Directive 2014/52/EU (EIA Directive) - Lemanaghan Wind Farm  
**Date:** 17 June 2021 12:30:20  
**Attachments:** [image002.png](#)  
**Importance:** High

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To Whom It May Concern:

OCC received correspondence from MKO Consultants on behalf of their client, Bord na Móna on the 5<sup>th</sup> May 2021 with regard to a scoping document for the proposed Lemanaghan Wind Farm. In this, MKO advised OCC that

*'this scoping request is not seeking the formal written opinion of the Planning Authority in relation to the scope and level of detail of information required to be included in the EIAR, as the project team are satisfied that feedback provided through discussions and meetings will sufficiently inform the process. This scoping document is being provided to give the planning authority sufficient background regarding the proposed development and the approach being adopted and does not constitute a formal request for a written opinion under Section 146CA or 173 of the Act'.*

Please be advised that given the workload currently being experienced by the Local Authority, the Planning Authority will not be providing a response to MKO until a formal scoping request is submitted by them.

**Olivia Hughes**

**Planning Section | Offaly County Council**

Phone Planning: +353 57 9357434 | Phone Switch: +353 57 9346 800

Email: [ohughes@offalycoco.ie](mailto:ohughes@offalycoco.ie) | Web: [www.offaly.ie](http://www.offaly.ie)

Áras an Chontae, Charleville Road, Tullamore, Co. Offaly | R35 F893 | Ireland



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## Edel Mulholland

---

**From:** Olivia Hughes <OHughes@offalycoco.ie>  
**Sent:** Friday 22 November 2024 12:03  
**To:** Edel Mulholland  
**Cc:** Anne Galvin; Niamh Slevin  
**Subject:** SCBR2403 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Offaly County Council

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Hi Edel

I refer to your email below.

As this is a proposed SID, Offaly County Council cannot provide a formalised scoping response in accordance with the requirements of the planning acts as this is a function of An Bord Pleanála.

Regards

**Olivia Hughes**

---

Oifigeach Foirne, An Roinn Pleanáil  
Staff Officer, Planning Department

**Comhairle Contae Uíbh Fhailí,**

Áras an Chontae, Bóthar an Rátha, Tulach Mhór, Co. Uíbh Fhailí, R35 F893

**Offaly County Council**

Áras an Chontae, Charleville Road, Tullamore, Co. Offaly, R35 F893

T. 057 9346800 E: [ohughes@offalycoco.ie](mailto:ohughes@offalycoco.ie) | W: [www.offaly.ie](http://www.offaly.ie)



---

**From:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>

**Sent:** Thursday 21 November 2024 14:20

**To:** Olivia Hughes <[OHughes@offalycoco.ie](mailto:OHughes@offalycoco.ie)>; Planning External <[planning@offalycoco.ie](mailto:planning@offalycoco.ie)>

**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Offaly County Council

Some people who received this message don't often get email from [emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie). [Learn why this is important](#)

Dear Ms. Hughes,

Just wanted to follow up on the below scoping exercise with regards to the Proposed Lemanaghan Wind Farm in County Offaly. Please see attached the Scoping document that was sent to you on the 23<sup>rd</sup> of October 2024.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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---

**From:** Edel Mulholland  
**Sent:** Wednesday 23 October 2024 14:24  
**To:** [ohughes@offalycoco.ie](mailto:ohughes@offalycoco.ie); [planning@offalycoco.ie](mailto:planning@offalycoco.ie)  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Offaly County Council

Dear Ms. Hughes,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with the Offaly County Council in 2021, please see attached the previous thread of conversation between yourself and MKO in relation to scoping carried out in May 2021.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information, and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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## David Naughton

---

**From:** Andrew Snowdon <andrew.snowdon@ripplecom.net>  
**Sent:** Wednesday 11 November 2020 16:07  
**To:** David Naughton  
**Subject:** Re: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

30 meters clearance on the blade tips should be fine.

Best regards,

Andrew

On 11/11/2020 16:02, David Naughton wrote:

Hi Andrew,

Thanks for that. Could you send me on the Fresnel zone for that link so that I can ensure that an appropriate buffer is applied to avoid turbine placement in that area?

Kind regard,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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---

**From:** Andrew Snowdon <[andrew.snowdon@ripplecom.net](mailto:andrew.snowdon@ripplecom.net)>  
**Sent:** Wednesday 11 November 2020 14:45  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Subject:** Re: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

One link passes through that site boundary.

The link is from 53.423967°, -7.935554° [Sheraton\_Athlone] -> 53.094734°, -7.592552° [Wolftrap].  
It's an 8 GHz Ceragon.

Best regards,

Andrew

On 11/11/2020 14:30, David Naughton wrote:

Hi Andrew,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Ripplecom has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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## Edel Mulholland

---

**From:** Outdoors <outdoors@sportireland.ie>  
**Sent:** Friday 6 December 2024 15:43  
**To:** Catherine Johnson; Ellen Costello; Susan Doran; Edel Mulholland  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Sports Ireland

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Hi Edel,

Sport Ireland Outdoors are responsible for maintaining the National Trails Register, a register of waymarked trails in Ireland.  
Having reviewed the document you sent over; I can confirm that we have no trails registered in the land highlighted for the proposed windfarm.

Kind regards,  
Duncan Gawthorpe  
System Support & Trails Executive,  
Sport Ireland, The Courtyard, Sport Ireland Campus, Snugborough Road, Blanchardstown, Dublin 15, D15 PN0N  
(E) [DGawthorpe@sportireland.ie](mailto:DGawthorpe@sportireland.ie)  
(T) 087 9074300



SPÓRT ÉIREANN  
SPORT IRELAND



Éirigh Gníomhach in Éirinn  
Get Ireland Active

---

**From:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Sent:** Thursday 21 November 2024 14:22  
**To:** Sport Ireland <[contactus@sportireland.ie](mailto:contactus@sportireland.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Sports Ireland

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Dear Sir/ Madam,

Just wanted to follow up on the below scoping exercise with regards to the Proposed Lemanaghan Wind Farm in County Offaly. Please see attached the Scoping document that was sent to you on the 23<sup>rd</sup> of October 2024.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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**From:** Edel Mulholland  
**Sent:** Wednesday 23 October 2024 14:27  
**To:** [contactus@sportireland.ie](mailto:contactus@sportireland.ie)  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** 200804 - EIA Scoping Document for Proposed Lemanaghan Wind Farm - Sports Ireland

Dear Sir/ Madam,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIA process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with Sport Ireland in May 2021 via a scoping letter sent in the post. Please see this cover letter attached for clarity.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIA guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIA should any updated information be available to inform the EIA process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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relate to the business do not reflect our Company Policy and we cannot accept any responsibility for any offence suffered or caused by receipt."

## David Naughton

---

**From:** Michael Duffy <mduffy@claracreditunion.ie>  
**Sent:** Tuesday 1 December 2020 10:50  
**To:** David Naughton  
**Cc:** Miriam Dolan  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

I have been in contact with the provider of our microwave system and have been informed that a development as proposed in the outlined area would have no impact on the operation of our current links system to our offices.

Kind regards

Michael Duffy | **Finance Officer**

St. Brigid's Credit Union, Church Street, Clara, Co. Offaly, R35 HR27

**Email:** [mduffy@claracreditunion.ie](mailto:mduffy@claracreditunion.ie)

**Telephone:** +353 (0)57 93 31196

**Website:** [www.stbrigidscu.ie](http://www.stbrigidscu.ie)



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**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** 26 November 2020 16:55  
**To:** Michael Duffy <mduffy@claracreditunion.ie>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Michael,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

After consulting with ComReg they informed us that you may have telecoms links in this area. Could you let us know if any pass through the site or may be effected and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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## Edel Mulholland

---

**From:** Gerry Dunican <gdunican@claracreditunion.ie>  
**Sent:** Monday 14 April 2025 13:59  
**To:** Catherine Johnson  
**Cc:** Edel Mulholland; Susan Doran; Michael Kelly  
**Subject:** Fw: 200804 - Lemanaghan WF Telecoms Scoping - Clara Credit Union

Some people who received this message don't often get email from gdunican@claracreditunion.ie. [Learn why this is important](#)

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Catherine

Our radiolink providers have confirmed this will not interfere with our network links

Thanks

Gerry Dunican | **Finance Officer**

St. Brigid's Credit Union, Church Street, Clara, Co. Offaly, R35 HR27

**Email:** [gdunican@claracreditunion.ie](mailto:gdunican@claracreditunion.ie)

**Office:** +353 (0)57 93 31196

**Website:** [www.stbrigidsclu.ie](http://www.stbrigidsclu.ie)



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**From:** Gerry Dunican <gdunican@claracreditunion.ie>  
**Sent:** Monday 24 March 2025 11:42  
**To:** [cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie) <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; [emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie) <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; [sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie) <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Cc:** Michael Kelly <[michael.kelly@claracreditunion.ie](mailto:michael.kelly@claracreditunion.ie)>; Miriam Dolan <[mdolan@claracreditunion.ie](mailto:mdolan@claracreditunion.ie)>  
**Subject:** Re: 200804 - Lemanaghan WF Telecoms Scoping - Clara Credit Union

Hi Catherine,

Michael Duffy now works part time only with the Credit Union so please forward any communication to myself in future.

We have forwarded your email to our radio link provider and await their response.

Thanks

Gerry Dunican | **Finance Officer**

St. Brigid's Credit Union, Church Street, Clara, Co. Offaly, R35 HR27

**Email:** [gdunican@claracreditunion.ie](mailto:gdunican@claracreditunion.ie)

**Office:** +353 (0)57 93 31196

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**From:** Michael Duffy <[mduffy@claracreditunion.ie](mailto:mduffy@claracreditunion.ie)>

**Sent:** Monday 24 March 2025 10:58

**To:** Gerry Dunican <[gdunican@claracreditunion.ie](mailto:gdunican@claracreditunion.ie)>; Michael Kelly <[michael.kelly@claracreditunion.ie](mailto:michael.kelly@claracreditunion.ie)>; Miriam Dolan <[mdolan@claracreditunion.ie](mailto:mdolan@claracreditunion.ie)>

**Subject:** FW: 200804 - Lemanaghan WF Telecoms Scoping - Clara Credit Union

---

**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>

**Sent:** 14 March 2025 09:23

**To:** Michael Duffy <[mduffy@claracreditunion.ie](mailto:mduffy@claracreditunion.ie)>

**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - Clara Credit Union

Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all Credit Union links within 5km of the site, if any?  
Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84

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## David Naughton

---

**From:** Thomas Barry <Tom.Barry@TETRAIRELAND.IE>  
**Sent:** Friday 13 November 2020 06:58  
**To:** David Naughton  
**Subject:** RE: EXTERNAL MAIL:- 200804 - Proposed Lemanaghan Wind Farm

David,

We anticipate no impact from the development as proposed. Can you ensure the proposal is also reviewed by eir.

Regards,  
Tom

---

**From:** David Naughton [mailto:dnaughton@mkoireland.ie]  
**Sent:** Wednesday 11 November 2020 14:43  
**To:** Thomas Barry  
**Subject:** EXTERNAL MAIL:- 200804 - Proposed Lemanaghan Wind Farm

**CAUTION: This mail is from outside Tetra.  
Do NOT click suspicious links.  
Do NOT click or download suspicious attachments.**

Hi Tom,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Tetra Ireland has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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## David Naughton

---

**From:** Alister Cole <Alister.Cole1@three.ie>  
**Sent:** Tuesday 24 November 2020 16:26  
**To:** David Naughton  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

We would be looking for 20m clearance from centre of Microwave link path to rotor tip,

Best regards,

Alister



Alister Cole  
Transmission Engineer

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

---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** 23 November 2020 10:52  
**To:** Alister Cole <Alister.Cole1@three.ie>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Alister,

Thanks very much for sending that on. Would you be able to let me know if there is any Fresnel zones for those links to avoid turbine placement in those areas?

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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**From:** Alister Cole <[Alister.Cole1@three.ie](mailto:Alister.Cole1@three.ie)>  
**Sent:** Thursday 19 November 2020 11:17  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

Apologies for the delayed response.

I have reviewed the details for proposed windfarm at Lemanaghan and 3Ireland currently have 1 live and 1 planned Microwave link traversing the area and that potentially could be affected. Please see below details for the 2 links;

Link Ref	A End site ID	X	Y	Dish Height	B End site ID	X	Y	Dish Height
ML017569	OF0024	212538	229368	17.6m	OF0019	220492	230145	27.1
TBC	OF0024	212538	229368	25m	OF0074	225812	233171	30m

I have also attached the spreadsheet with above.

Best regards,

Alister



Alister Cole  
Transmission Engineer

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

---

**From:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Sent:** 11 November 2020 14:46  
**To:** Alister Cole <[Alister.Cole1@three.ie](mailto:Alister.Cole1@three.ie)>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Alister,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Three Ireland has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



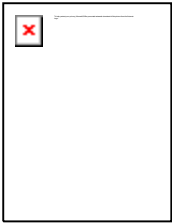
David Naughton B.Sc. (Env.)  
Environmental Scientist

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## Edel Mulholland

---

**From:** Catherine Johnson  
**Sent:** Friday 14 March 2025 11:43  
**To:** David Montgomery  
**Cc:** Edel Mulholland; Susan Doran  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

Perfect, thank you!

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

---

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---

**From:** David Montgomery  
**Sent:** Friday 14 March 2025 11:41  
**To:** Catherine Johnson  
**Cc:** Edel Mulholland ; Susan Doran  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Catherine,

Same as the original response, 20m please?

Thanks,

Dave

---

**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 11:33  
**To:** David Montgomery <[David.Montgomery@three.ie](mailto:David.Montgomery@three.ie)>

Cc: Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

Subject: RE: 200804 Lemanaghan Revised telecoms scoping

**CAUTION!** External Email.

Hi David,

Thank you for sending on – is there any specific setback/Fresnel zone that you have identified for these links?

Kind regards,  
Catherine

**Catherine Johnson BSc. LLM.**  
Environmental Scientist

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**From:** David Montgomery <[David.Montgomery@three.ie](mailto:David.Montgomery@three.ie)>

**Sent:** Friday 14 March 2025 11:18

**To:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>

**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Susan,

We now have a 3<sup>rd</sup> link that passes through this area. Link details below;

Link Name / ID	Band MHz\GHz	Link Length	A End site ID	Site A					B End site ID	Lat
				Lat	Long	Easting	Northing	Ant Height		
ML017569	26	8km	OF0024	53.31467	- 7.81266	212538	229368	18m	OF0019	53.32141
ML020796	18	13.8km	OF0024	53.31467	- 7.81266	212538	229368	16m	OF0074	53.3483

ML021134	26	7.1km	OF0024	53.31467	- 7.81266	212538	229368	15m	OF0116	53.2816
----------	----	-------	--------	----------	--------------	--------	--------	-----	--------	---------



Regards,

Dave

---

**From:** David Montgomery  
**Sent:** Friday 14 March 2025 09:17  
**To:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

Sorry Susan,

I should have opened the attachment.  
I'll check and response with the latest details.

Regards,

Dave

---

**From:** David Montgomery  
**Sent:** Friday 14 March 2025 09:15  
**To:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

Hi Susan,

Would you have the previous response form 2020?  
I think there have been a lot of changes in this area since.

Thanks,

Dave

---

**From:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:11  
**To:** David Montgomery <[David.Montgomery@three.ie](mailto:David.Montgomery@three.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Subject:** 200804 Lemnaghan Revised telecoms scoping

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Good afternoon,

We would like to follow up on a scoping exercise that was previously completed for Lemnaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemnaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all Three links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Susan

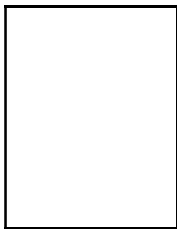
**Susan Doran**  
Environmental Scientist

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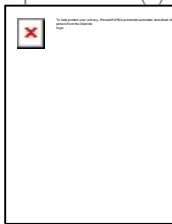


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## David Naughton

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**From:** INFO <Information@tii.ie>  
**Sent:** Monday 17 May 2021 17:20  
**To:** David Naughton  
**Subject:** RE: 200804 - EIAR Scoping Document for proposed Lemanaghan Wind Farm

Dear Mr. Naughton,

I refer to your email of 6 May 2021 regarding the above EIAR Scoping exercise.

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

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National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national road network. It is also an investment priority of the National Development Plan, 2018 – 2027, to ensure that the extensive transport networks which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

In relation to your EIAR Scoping referral, TII notes the proposed site adjoins the N62, national road, at a location on the network that is subject to a general 100kph speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50kph apply. Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application, including in relation to any future associated amenity uses, and available alternative arrangements to the local and regional road network should be utilised.

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

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

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

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

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

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

Additionally, any damage caused to the pavement on the existing national road arising from any temporary works due to the turning movement of abnormal 'length' loads (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.

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

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

In the context of the existing national road network, in accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the

strategic capacity and safety of the network. This requirement is further reflected in the National Development Plan, the recent publication of the Draft National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

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

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

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

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

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

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

Yours sincerely,

**Alban Mills**  
**Senior Regulatory and Administration Executive**



---

**From:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Sent:** Wednesday 5 May 2021 11:48  
**To:** Landuse Planning <[LandUsePlanning@tii.ie](mailto:LandUsePlanning@tii.ie)>  
**Subject:** 200804 - EIAR Scoping Document for proposed Lemanaghan Wind Farm

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

Dear Sir or Madam,

Please find attached a cover letter and Scoping Document for a proposed wind farm development in Lemanaghan and adjacent townlands in Co. Offaly.

As part of the scoping exercise for the proposed development, we would welcome any comments in relation to the proposed project.

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

Kind regards,



David Naughton B.Sc. (Env.)

Environmental Scientist

**MKO**

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## Edel Mulholland

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**From:** INFO <Information@tii.ie>  
**Sent:** Thursday 14 November 2024 17:00  
**To:** Edel Mulholland  
**Subject:** TII24-129235 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm Offaly.

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**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

**Dear Ms. Mulholland,**

Thank you for your correspondence of 23 October 2024 in relation to the above. The position in relation to your enquiry is as follows.

Transport Infrastructure Ireland (TII) wishes to advise you that it is not in a position to engage directly with planning applicants regarding proposed developments. 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 national road and light rail policy and guidelines including Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and TII Publications.

In relation to your EIAR Scoping referral, TII again notes the proposed site adjoins the N62, a national road, at a location on the network that is subject to a general 100km/h speed limit. In such circumstances, the developer/applicant should be aware that official policy concerning access to national roads seeks to avoid the creation of additional access points from new development or the generation of increased traffic from existing accesses (i.e. non-public road access) to national roads, to which speed limits greater than 50km/h apply. Therefore, there are policy and road safety considerations that would need to be resolved in any subsequent application, including in relation to any future associated amenity uses, and available alternative arrangements to the local and regional road network should be utilised.

Regard should also be had to other relevant guidance available at [www.TII.ie](http://www.TII.ie).

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

Concerning EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national roads and/or light rail networks. The project promoter should have regard, inter alia, to the following:

Having regard to the EPA guidelines on the information to be contained in Environmental Impact Assessment Reports, 2022 it is recommended as appropriate that the national road and light rail networks be recognised as strategic transport assets under "material assets".

EIAR assessment and mitigation should have regard to the following:

- **National Roads:** Official policy for development at or near national roads is set out in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) available at <https://www.gov.ie/en/collection/85b83-planning-guidelines-standards/>
- **TII Publications:** In addition, as part of TII's responsibilities for managing and improving the country's national road and light rail networks, TII sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at <https://www.tiipublications.ie/>.

In addition, the EIAR should have regard to, inter alia, the following:

#### **National Road Network:**

- 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,
- Consultations should be had with the relevant Local Authority/National Roads Design Office (RDO) with regard to locations of existing and future national road schemes,
- The EIAR should have regard to any prior Environmental Impact Statement or Assessment Report 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 EIAR should have regard to the provisions of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines in the assessment.

#### **TII Publications:**

- It would be important that, where appropriate, subject to meeting the applicable 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. TII's Traffic and Transport Assessment Guidelines (TII Publication No. PE-PDV-02045) should be referred to in relation to the 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 Guidelines which addresses requirements for sub-threshold TTA,
- The designers and assessors are asked to consult TII Publications to determine whether a Road Safety Audit is required.

#### **TII environmental assessment guidance:**

- The EIAR should have regard to TII's Environmental Assessment and Construction Guidelines, including the Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (March 2014),
- 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

### **Haul routes utilising the national road network:**

- Elements of the national road network are operated and managed by a combination of Public-Private Partnerships (PPP) concessions, Motorway Maintenance and Renewal Contractors (MMaRC) and local road authorities in association with TII. In relation to haul route identification, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed to ascertain any operational requirements, including delivery timetabling, etc. to ensure that the strategic function of the national road network is safeguarded.
- Separate structure approvals/permits and other licences and works-specific deeds of indemnity may be required in connection with the proposed haul route, including where temporary modification to the road network may be required. Consultation with relevant local authorities, PPP and MMaRC may also be required.
- All structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed, including abnormal weight load. 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.

### **National Road Crossings:**

- 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,
- The preferred method of necessary national road network crossings is horizontal directional drilling (HDD). It is appropriate for the designers to contact [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in order to coordinate and process approvals for this type of crossing that may include requirements for Section 53 consent and specific indemnities for the works.

### **Potential cable routing**

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

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

and TII is of the opinion that grid connection cable routing should reflect the foregoing provisions of official policy.

TII has identified a number of significant implications for TII and road authorities in the management and maintenance of the strategic national road network resulting from the laying of high voltage electricity cabling in the national road reservation, including:

- Impacts on embankments, bridges, drainage, and road furniture infrastructure leading to future maintenance liabilities,
- Impediments to future maintenance and operations activities, such as safety barrier repair and French drain renewal,
- Impediments to future routine network improvements such as pavement overlay and strengthening, installation of new verge-side signs and other road furniture,
- Impediment to future online upgrades of national roads because of the implications to road authority/TII in having to incur the additional costs of moving underground cables in order to accommodate the road improvements.

Proposals to lay cable in the national road reservation, including the construction of associated joint bays, have the potential to impact road authorities and TII in undertaking future maintenance and improvement requirements. There may also be additional cost implications to national road improvements and maintenance resulting from the presence of high-voltage cabling within the national road reservation.

Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including: "All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution". Consistent with CAP24, for all renewable energy developments requiring grid connection to the national grid, TII recommends that a full assessment of all route alternatives for grid connection takes place, including alternatives to public roads, where appropriate to demonstrate clearly that the 'optimal solution' in accordance with CAP 24 requirements is proposed in the subject application. 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 on 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.

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

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

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

Yours sincerely,

**Rachel Begley**  
**Regulatory & Administration Executive**  
**Transport Infrastructure Ireland**



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## David Naughton

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**From:** Rachel Hennessy <RHennessy@towercom.ie>  
**Sent:** Tuesday 1 December 2020 17:45  
**To:** David Naughton  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

Apologies for the delay in coming back to you.

From an initial review it does not appear we have any links that would be affected.

Kind regards,  
Rachel

Rachel Hennessy  
**Towercom**  
M: +353 (0)86 843 9587  
E: [rachel.hennessy@towercom.ie](mailto:rachel.hennessy@towercom.ie)

---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Thursday 26 November 2020 10:15  
**To:** Rachel Hennessy <RHennessy@towercom.ie>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Rachel,

Just following up to see if we can get a response to the below.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**  
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**From:** David Naughton  
**Sent:** Wednesday 11 November 2020 14:49

To: [RHennesy@towercom.ie](mailto:RHennesy@towercom.ie)

Subject: 200804 - Proposed Lemanaghan Wind Farm

Hi Rachel,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Towercom has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**  
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## Edel Mulholland

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**From:** Raymond Ryan <rryan@towercom.ie>  
**Sent:** Friday 21 March 2025 13:33  
**To:** Susan Doran  
**Cc:** Catherine Johnson; Edel Mulholland  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Towercom

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Hi Susan,

Thank you for sending on the KMZ file and our original response.

I can confirm that having reviewed the KMZ file, I see no impact on Towercoms operations in relation to the proposed windfarm development.

Kind Regards,

Ray

---

**Ray Ryan**

**Property Manager**

m: +353 87 9718041

[Website](#) | [LinkedIn](#)



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**From:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Sent:** Thursday 20 March 2025 16:30  
**To:** Raymond Ryan <[rryan@towercom.ie](mailto:rryan@towercom.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Towercom

Hi Raymond,

Please see attached as well as the email below, from which I have copied the text for your convenience:

‘Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all Towercom links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

If you have any queries, please do not hesitate to contact me. Thank you in advance.’

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

---

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416 765



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---

**From:** Raymond Ryan <[rryan@towercom.ie](mailto:rryan@towercom.ie)>  
**Sent:** Thursday 20 March 2025 15:13  
**To:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Subject:** FW: 200804 - Lemanaghan WF Telecoms Scoping - Towercom

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Susan,

Please send me the original email that you had sent to my colleague, Rachel, including the KMZ File and our previous response.

Kind Regards,

Ray

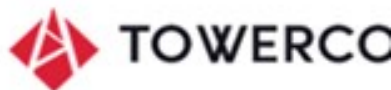
---

**Ray Ryan**

**Property Manager**

m: +353 87 9718041

[Website](#) | [LinkedIn](#)



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Please consider the environment before printing this email. 🌱

---

**From:** Victor Collins <[vcollins@towercom.ie](mailto:vcollins@towercom.ie)>

**Sent:** Wednesday 19 March 2025 15:32

**To:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>; Raymond Ryan <[rryan@towercom.ie](mailto:rryan@towercom.ie)>

**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Rachel Hennessy <[rachel.hennessy@towercom.ie](mailto:rachel.hennessy@towercom.ie)>; Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Tommy Galligan <[Tommy.Galligan@towercom.ie](mailto:Tommy.Galligan@towercom.ie)>

**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Towercom

Hi Susan

[@Raymond Ryan](#) will deal with your query on behalf of Towercom.

BR

Victor

---

**From:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Sent:** Wednesday, March 19, 2025 2:54 PM  
**To:** Victor Collins <[vcollins@towercom.ie](mailto:vcollins@towercom.ie)>  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Rachel Hennessy <[rachel.hennessy@towercom.ie](mailto:rachel.hennessy@towercom.ie)>; Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Towercom

Some people who received this message don't often get email from [sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie). [Learn why this is important](#)

Hi there,

Can I please follow up on the below email regarding updated telecoms links?

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

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

Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416 765



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---

**From:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:36  
**To:** [vcollins@towercom.ie](mailto:vcollins@towercom.ie)  
**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>; [rhennessy@towercom.ie](mailto:rhennessy@towercom.ie)  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - Towercom

Hi – as we received an out of Rachel please see the below scoping email in relation to Lemanaghan Wind Farm.

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

**MKO**

Tuam Road, Galway, H91 VW84

Offices in Galway and Dublin

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



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**From:** Catherine Johnson

**Sent:** Friday 14 March 2025 09:22

**To:** [rhennesy@towercom.ie](mailto:rhennesy@towercom.ie)

**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - Towercom

Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all Towercom links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,

Catherine

**Catherine Johnson BSc. LL.M.**

Environmental Scientist

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## David Naughton

---

**From:** Marcin Skupski <Marcin.Skupski@viatel.com>  
**Sent:** Tuesday 12 January 2021 09:19  
**To:** David Naughton  
**Cc:** newbuild  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

Thank You for your email. I can confirm that proposed development should not interfere with Viatel wireless network.

Kind Regards,  
**Marcin Skupski**  
Build and Maintenance Team Leader

T: 086 832 0724  
M: [marcin.skupski@viatel.com](mailto:marcin.skupski@viatel.com)

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



We make Cloud, Connectivity,  
& Security Services easy to use

---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Monday 11 January 2021 16:30  
**To:** Marcin Skupski <Marcin.Skupski@viatel.com>  
**Cc:** newbuild <newbuild@viatel.com>  
**Subject:** FW: 200804 - Proposed Lemanaghan Wind Farm

Hi Marcin,

I'm just forwarding the below thread to see if we can get some clarification as to whether or not viatel have any links within proximity of the proposed wind farm.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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

**From:** David Naughton  
**Sent:** Thursday 26 November 2020 10:16  
**To:** 'Donna.Fairbrother@viatel.com' <[Donna.Fairbrother@viatel.com](mailto:Donna.Fairbrother@viatel.com)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Donna,

Just following up to see if we can get a response to the below.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist  
**MKO**  
Tuam Road, Galway  
Ireland, H91 VW84  
+353 (0) 91 735611  
[www.mkoireland.ie](http://www.mkoireland.ie)



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---

**From:** David Naughton  
**Sent:** Wednesday 11 November 2020 15:23  
**To:** [Donna.Fairbrother@viatel.com](mailto:Donna.Fairbrother@viatel.com)  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Donna,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Viatel has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist  
**MKO**  
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Click [here](#) to report this email as spam.

## David Naughton

---

**From:** Liam Allister <Liam.Allister@virginmedia.ie>  
**Sent:** Wednesday 16 December 2020 12:40  
**To:** David Naughton  
**Cc:** Mark Nolan  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

This link is a COMREG licenced Virgin Media Data Backhaul link between Woltrap and Athlone carrying premium business data and cannot have any interference. We can go to a minimum distance of 52m from line of sight to blade tip on this link to avoid interference.

Regards,

Liam Allister | B2B Access Network Transmission Engineer,  
**Virgin Media** | John F Connelly Road, Churchfield, Cork.  
[Liam.allister@virginmedia.ie](mailto:Liam.allister@virginmedia.ie)

---

**From:** David Naughton [mailto:dnaughton@mkoireland.ie]  
**Sent:** 10 December 2020 15:50  
**To:** Liam Allister <Liam.Allister@virginmedia.ie>  
**Cc:** Mark Nolan <Mark.Nolan@virginmedia.ie>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Liam,

Thanks for coming back to me on that. As the link is running right through the middle of the site 100m either side is fairly significant in terms of the viable area for turbine placement. Is there any way that this can be reduced or that an accurate Fresnel zone for the link could be provided.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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---

**From:** Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Sent:** Tuesday 1 December 2020 15:15  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>

**Cc:** Mark Nolan <[Mark.Nolan@virginmedia.ie](mailto:Mark.Nolan@virginmedia.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,  
Apologies for delay in getting back to you. Ideally we would like a 100m distance from the los of our link to avoid any interference.

Regards,  
Liam Allister | B2B Access Network Transmission Engineer,  
**Virgin Media** | John F Connelly Road, Churchfield, Cork.  
[Liam.allister@virginmedia.ie](mailto:Liam.allister@virginmedia.ie)

---

**From:** David Naughton [<mailto:dnaughton@mkofireland.ie>]  
**Sent:** 13 November 2020 09:18  
**To:** Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Cc:** Mark Nolan <[Mark.Nolan@virginmedia.ie](mailto:Mark.Nolan@virginmedia.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Liam,

Would you be able to give me a Fresnel zone/buffer or area of avoidance from those links if turbines were to end up being that tall?

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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+353 (0) 91 735611  
[www.mkofireland.ie](http://www.mkofireland.ie)



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**From:** Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Sent:** Thursday 12 November 2020 17:53  
**To:** David Naughton <[dnaughton@mkofireland.ie](mailto:dnaughton@mkofireland.ie)>  
**Cc:** Mark Nolan <[Mark.Nolan@virginmedia.ie](mailto:Mark.Nolan@virginmedia.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,  
At a height of 185m it would be in danger of intersecting the LoS. We would require a Fresnel zone avoidance buffer.  
Regards  
Liam

---

**From:** David Naughton [<mailto:dnaughton@mkoireland.ie>]  
**Sent:** 12 November 2020 11:23  
**To:** Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi Liam,

Many thanks for sending that on. As it is still early stage the tip height isn't nailed on yet. Looking at worst case scenario it would probably be in the range of 185m tip height. Could you confirm that a Fresnel zone/ avoidance buffer is not needed for that link, i.e. LOS of link only?

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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**From:** Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Sent:** Thursday 12 November 2020 10:56  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>; Cathal O Donnell <[Cathal.ODonnell@virginmedia.ie](mailto:Cathal.ODonnell@virginmedia.ie)>  
**Cc:** Mark Nolan <[Mark.Nolan@virginmedia.ie](mailto:Mark.Nolan@virginmedia.ie)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

See attached screen shot. Virgin Media have a microwave link from Wolftrap (53° 5'41.19"N 7°35'33.34"W) to Athlone (53°25'17.87"N 7°54'45.07"W) . This is the data backhaul link for Wolftrap. What is the max height are the Turbines. If the Turbines are not placed directly on the | Los of the link there should be no issue.

Regards  
Liam Allister.

---

**From:** David Naughton [<mailto:dnaughton@mkoireland.ie>]  
**Sent:** 11 November 2020 15:07  
**To:** Cathal O Donnell <[Cathal.ODonnell@virginmedia.ie](mailto:Cathal.ODonnell@virginmedia.ie)>  
**Cc:** Liam Allister <[Liam.Allister@virginmedia.ie](mailto:Liam.Allister@virginmedia.ie)>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Cathal,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Virgin Media has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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## Edel Mulholland

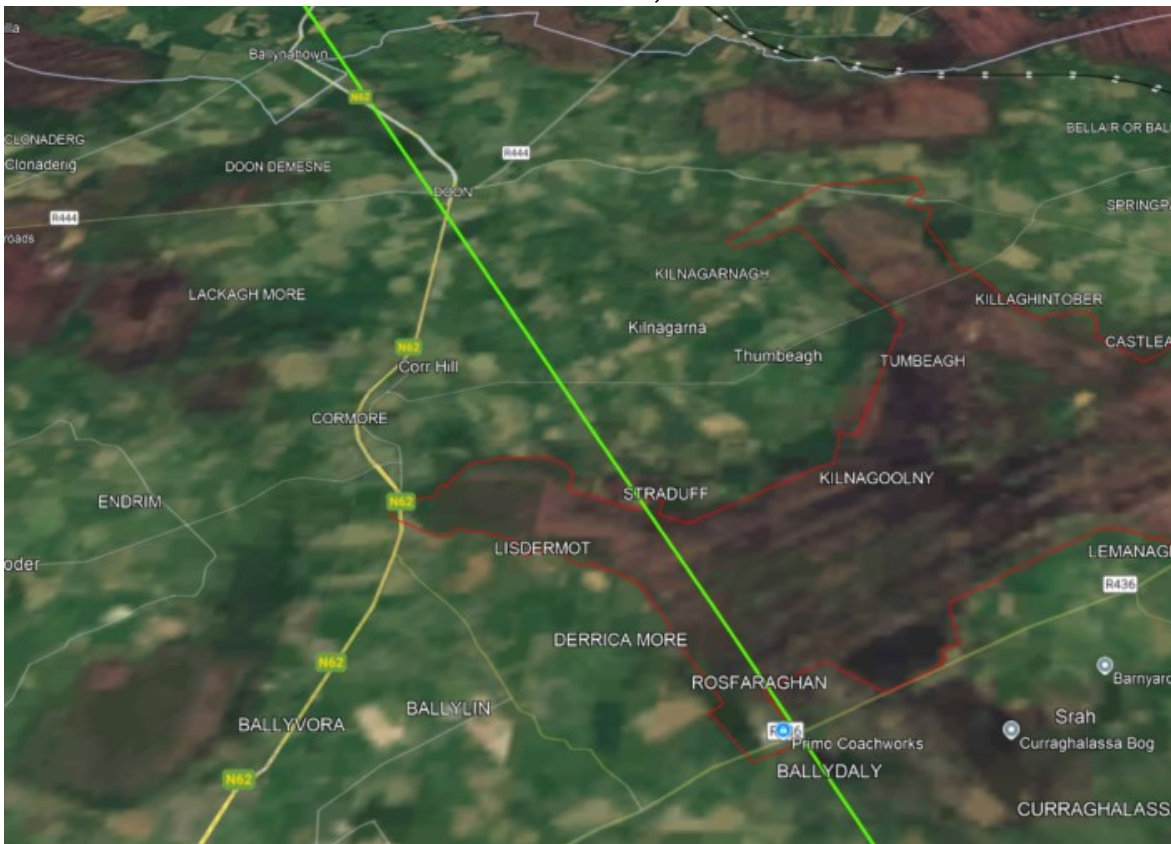
---

**From:** Mark Nolan <Mark.Nolan@virginmedia.ie>  
**Sent:** Wednesday 19 March 2025 15:01  
**To:** Susan Doran  
**Cc:** Catherine Johnson; Edel Mulholland  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

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Hi Susan,

One of our main backhaul links transverses this site, see details below.



A end - 53°25'17.87"N 7°54'45.07"W

B end - 53° 5'41.19"N 7°35'33.34"W

100m set back

Rgds

Mark

Mark Nolan B2B Access Network Manager

Virgin Media |LEDP, Roxboro Road, Limerick.

D: + 353(0)1 2458480 | M: + 353(0)862315007

[mark.nolan@virginmedia.ie](mailto:mark.nolan@virginmedia.ie) | [www.virginmedia.ie](http://www.virginmedia.ie)

---

**From:** Susan Doran

**Sent:** Wednesday 19 March 2025 14:46

**To:** Mark Nolan

**Cc:** Catherine Johnson ; Edel Mulholland  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

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Hi there,  
Can I please follow up on the below email regarding updated telecoms links?  
Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

MKO  
Tuam Road, Galway, H91 VW84  
Offices in Galway and Dublin  
[mkoireland.ie](http://mkoireland.ie) | +353 (0)91 416  
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**From:** Susan Doran  
**Sent:** Friday 14 March 2025 09:11  
**To:** 'mark.nolan@virginmedia.ie' <[mark.nolan@virginmedia.ie](mailto:mark.nolan@virginmedia.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Subject:** 200804 Lemanaghan Revised telecoms scoping

Good afternoon,  
We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.  
We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).  
Please also find a copy of your previous response attached for ease of consistency.  
Could you please provide the start and end point (ITM) of all Virgin Media links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.  
If you have any queries, please do not hesitate to contact me. Thank you in advance

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

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Tuam Road, Galway, H91 VW84  
Offices in Galway and Dublin  
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## David Naughton

---

**From:** Lyons, Sean, Vodafone Ireland (External) <sean.lyons@vodafone.com>  
**Sent:** Thursday 12 November 2020 11:13  
**To:** David Naughton  
**Cc:** Byrne, Gavin, Vodafone Ireland  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

The minimum Fresnel on these 2 links would 7.68m radius and 9.77m radius respectively.



**Sean Lyons**

**\*\*Upcoming annual leave – November 26<sup>th</sup> to December 6<sup>th</sup>\*\***

Transmission Program Manager

Converged Transmission

Technology- NET

+353877758117

[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)

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C2 General

---

**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** Thursday 12 November 2020 10:49  
**To:** Lyons, Sean, Vodafone Ireland (External) <sean.lyons@vodafone.com>  
**Cc:** Byrne, Gavin, Vodafone Ireland <gavin.byrne@vodafone.com>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

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Hi Sean,

Many thanks for sending that on. Could you send me the Fresnel zone for those links so that I can ensure that an appropriate buffer is applied to avoid turbine placement in those areas? As mentioned the design stage is very early and currently there is no turbine layout in mind, although this will be informed by a constraints mapping exercise, including avoidance of telecoms links.

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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



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---

**From:** Lyons, Sean, Vodafone Ireland (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>  
**Sent:** Thursday 12 November 2020 09:25  
**To:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Cc:** Byrne, Gavin, Vodafone Ireland <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

Hi David,

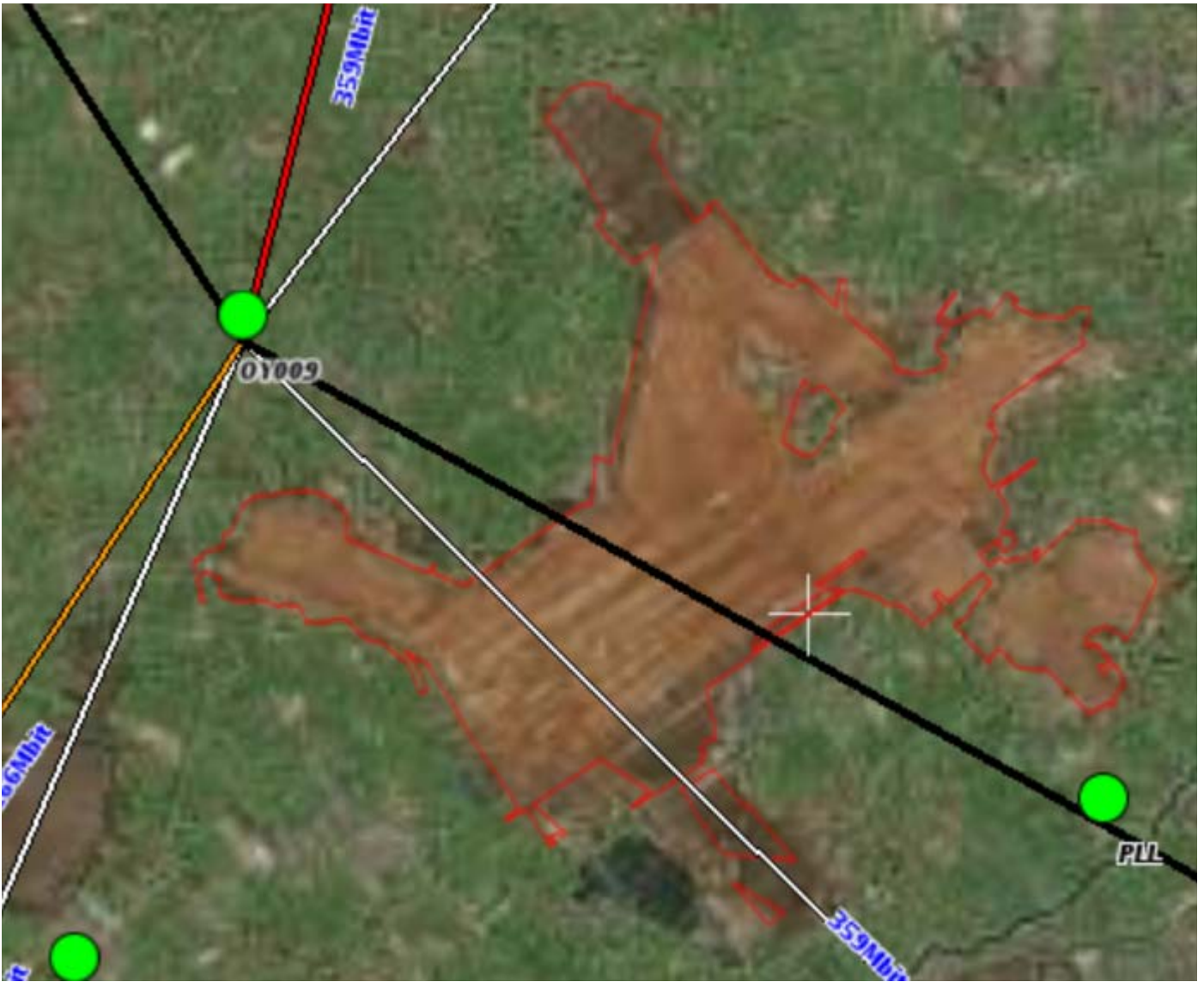
Initial analysis show that Vodafone have 2 links that traverse this proposed windfarm area.

Links in question are:

OY009 Cor Hill (53.3144, -7.8119) – OY050 Oughter Bog (53.2395, -7.6863) - Live

OY009 Cor Hill (53.3144, -7.8119) – ZZTS1 Tullamore Show(53.2413, -7.5954) – Used for temp event.

Once turbine locations are confirmed, we can complete more detailed analysis.



**Sean Lyons**

**\*\*Upcoming annual leave – November 26<sup>th</sup> to December 6<sup>th</sup>\*\***

Transmission Program Manager

Converged Transmission

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[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)

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C2 General

**From:** Byrne, Gavin, Vodafone Ireland <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>

**Sent:** Wednesday 11 November 2020 15:30

**To:** Lyons, Sean, Vodafone Ireland (External) <[sean.lyons@vodafone.com](mailto:sean.lyons@vodafone.com)>

**Cc:** Cassidy, Emma, Vodafone Ireland <[emma.cassidy@vodafone.com](mailto:emma.cassidy@vodafone.com)>; Neill o', Shane, Vodafone Ireland <[shane.oneill2@vodafone.com](mailto:shane.oneill2@vodafone.com)>

**Subject:** FW: 200804 - Proposed Lemanaghan Wind Farm

Hi Sean,

Can you ask one of the team to take a look at his windfarm development



**Gavin Byrne**

TX Planning & Design Engineer

Converged Transmission

+353876448159

[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)

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Ireland: No. 326967

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**From:** David Naughton <[dnaughton@mkoireland.ie](mailto:dnaughton@mkoireland.ie)>  
**Sent:** Wednesday 11 November 2020 15:13  
**To:** Byrne, Gavin, Vodafone Ireland <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

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Hi Gavin,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if Vodafone has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

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## Edel Mulholland

**From:** Robert Power, Vodafone (External) <robert.power1@vodafone.com>  
**Sent:** Thursday 20 March 2025 09:49  
**To:** Susan Doran  
**Cc:** Gavin Byrne, Vodafone; Shane O'Neill, Vodafone; Catherine Johnson; Edel Mulholland  
**Subject:** RE: 200804 Lemanaghan Revised telecoms scoping

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Hi Susan,

There are two Vodafone links passing through the proposed area. See details below.

A clearance of 30m from the first Fresnel zone is desired. Please let me know if you required any additional information.

Kind Regards,  
Robert



**Robert Power**

Transmission Engineer  
Technology- NET  
+353864648455

[robert.power1@vodafone.com](mailto:robert.power1@vodafone.com)

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Link Name / ID	Band GHz	Link Length Km	Site A			Site B	
			Northing (Irish Grid)	Easting (Irish Grid)	Ant Height m	Northing (Irish Grid)	Easting (Irish Grid)
OY009-OY050	15	11.813	229358	212537	12	221059	22094
OY052-OY009	13	16.088	217970	223901	10	229358	21253



---

**From:** Gavin Byrne, Vodafone <gavin.byrne@vodafone.com>  
**Sent:** Wednesday 19 March 2025 18:27  
**To:** Robert Power, Vodafone (External) <robert.power1@vodafone.com>  
**Cc:** Shane O'Neill, Vodafone <shane.oneill2@vodafone.com>  
**Subject:** FW: 200804 Lemanaghan Revised telecoms scoping

Hi Rob,

Can you please review the attached windfarm?



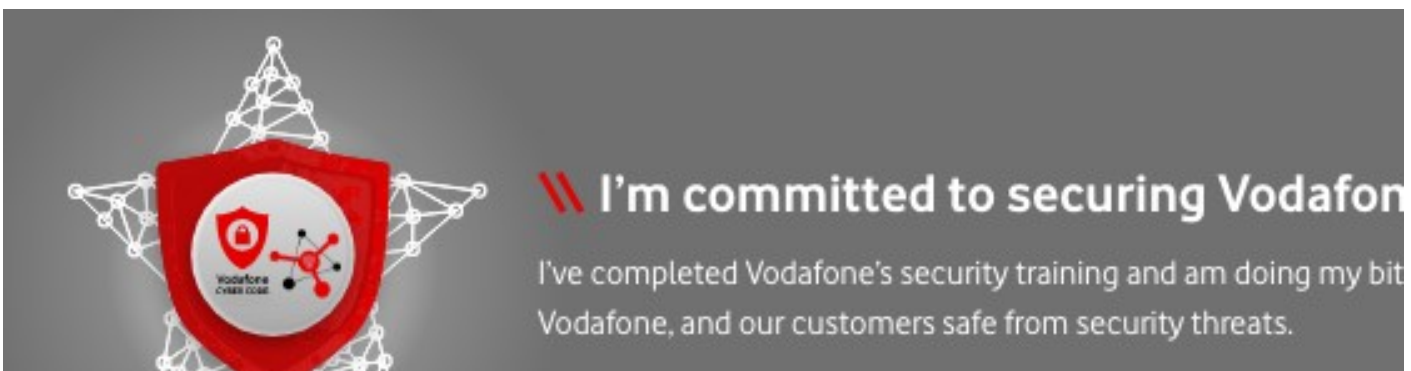
**Gavin Byrne**

Senior TX Planning & Design Engineer  
Converged Transmission  
+353 876448159  
[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)

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**From:** Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Sent:** Friday 14 March 2025 09:11  
**To:** Gavin Byrne, Vodafone <[gavin.byrne@vodafone.com](mailto:gavin.byrne@vodafone.com)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Subject:** 200804 Lemnaghan Revised telecoms scoping

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Good afternoon,

We would like to follow up on a scoping exercise that was previously completed for Lemnaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemnaghan WF site is 615912.5, 728040.0 (ITM).

Please also find a copy of your previous response attached for ease of consistency.

Could you please provide the start and end point (ITM) of all Vodafone links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Susan

**Susan Doran**  
Environmental Scientist

---

**MKO**

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C2 General

C2 General

## Edel Mulholland

---

**From:** Sabine Browne <Sabine.Browne@waterwaysireland.org>  
**Sent:** Thursday 21 November 2024 15:58  
**To:** Edel Mulholland; Cormac McCarthy  
**Cc:** Catherine Johnson; Ellen Costello; Susan Doran  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Waterways Ireland

**Caution:** This is an external email and may be malicious. Please take care when clicking links or opening attachments.

Good afternoon,

This is not within any Zone of Influence of our waterways so we will not be commenting.

Kind regards,

**Sabine Browne**

---

**From:** Edel Mulholland <emulholland@mkoireland.ie>  
**Sent:** 21 November 2024 14:24  
**To:** Sabine Browne <Sabine.Browne@waterwaysireland.org>; Cormac McCarthy <cormac.mccarthy@waterwaysireland.org>  
**Cc:** Catherine Johnson <cjohnson@mkoireland.ie>; Ellen Costello <ecostello@mkoireland.ie>; Susan Doran <sdoran@mkoireland.ie>  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Waterways Ireland

Dear Sir/ Madam,

Just wanted to follow up on the below scoping exercise with regards to the Proposed Lemanaghan Wind Farm in County Offaly. Please see attached the Scoping document that was sent to you on the 23<sup>rd</sup> of October 2024.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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---

**From:** Edel Mulholland

**Sent:** Wednesday 23 October 2024 14:29

**To:** [sabine.browne@waterwaysireland.org](mailto:sabine.browne@waterwaysireland.org); [cormac.mccarthy@waterwaysireland.org](mailto:cormac.mccarthy@waterwaysireland.org)

**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - Waterways Ireland

Dear Sir/ Madam,

Lemanaghan Wind Farm DAC intends to apply for planning permission to construct a wind energy development at Lemanaghan and surrounding townlands, northeast of Ferbane, County Offaly. As part of the EIAR process for the Lemanaghan Wind Farm development, scoping was carried out in May 2021 to identify details regarding the Proposed Development and the subject site, including the site selection process. MKO would have previously carried out scoping with Waterways Ireland in May 2021 via a scoping letter sent in the post. Please see this cover letter attached for clarity.

Due to the time elapsed from when previous scoping was carried out, updates in local and national policy and legislation, updates in relevant EIAR guidance, changes in the environmental baseline and refinement of the Proposed Development layout and design, it is considered appropriate to invite consultees to contribute further to the EIAR should any updated information be available to inform the EIAR process.

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the revised 2024 Scoping Document providing details of the Proposed Development. As seen below, we wish to ensure that all queries, information, and comments are captured from relevant consultees; therefore, while we appreciate that responses were issued in 2021, we want to reach out again with a revised 2024 scoping document and invite further consultation as appropriate.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

---

**MKO**

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## Edel Mulholland

---

**From:** Westnet <info@westnet.ie>  
**Sent:** Friday 14 March 2025 09:25  
**To:** Catherine Johnson  
**Subject:** Re: 200804 - Lemanaghan WF Telecoms Scoping - Western Broadband Network [wn# 184817]

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Hi Catherine,

We've no infrastructure that would be affected by the proposed development.

Jules Westnet Support

On Fri 14 Mar 2025, 09:23 Catherine Johnson [cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie) wrote:

Good morning,

We are working on a constraints study for a proposed wind farm in Lemanaghan, Co. Offaly, located approximately 3km east of Ferbane and 7km west-southwest of Clara in Co. Offaly. We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of any WBN links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

--  
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[www.westnet.ie](http://www.westnet.ie)



## Edel Mulholland

---

**From:** Matthew Craig <matthew.craig@2rn.ie>  
**Sent:** Thursday 24 October 2024 11:12  
**To:** Edel Mulholland  
**Cc:** windfarms@rte.ie; Johnny Evans  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - 2rn  
**Attachments:** Protocol Agreement 2024.docx

You don't often get email from matthew.craig@2rn.ie. [Learn why this is important](#)

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Hi Edel,

The proposed turbine locations are no risk to our fixed linking. The path crosses the extents of windfarm that we have previously received but as it stands the nearest turbine is 2km from our nearest link path. I have attached a copy of the protocol, if you could please fill out the empty sections on the first two pages, have it signed and returned to me, I will get it signed and send you the completed document.

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:** Edel Mulholland <emulholland@mkoireland.ie>  
**Sent:** Thursday 24 October 2024 09:56  
**To:** Matthew Craig <matthew.craig@2rn.ie>  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - 2rn

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Hi Matthew,

The Turbine layout KMZ file is attached above.

The turbine dimensions are as follows: 220m Tip Height, 145m Hub Height and 150m Rotor Diameter.

Will you also be able to issue the 2rn protocol document please.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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**From:** Matthew Craig <[matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie)>  
**Sent:** Wednesday 23 October 2024 17:41  
**To:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Cc:** Johnny Evans <[johnny.evans@2rn.ie](mailto:johnny.evans@2rn.ie)>; windfarms <[windfarms@rte.ie](mailto:windfarms@rte.ie)>; Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>  
**Subject:** RE: 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - 2rn

You don't often get email from [matthew.craig@2rn.ie](mailto:matthew.craig@2rn.ie). [Learn why this is important](#)

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Hi Edel,

Could you please send me the proposed windfarm extents as KMZ or SHP files?

From what I can see from the maps, we have an off-air link between our site at Cairn Hill and Kilduff passing over the far-left extent of the marked area.

Link	Site 1						Name	Lat	Long	S
	Name	Lat	Long	Site Height (m) AMSL	Ant Height (m) AGL	Ant Height (m) AMSL				
CHL_KDF_DTT	Cairn Hill	53.807227	7.71535	260	132	392	Kilduff	52.83521	7.90999	-

There is also a risk of interference to broadcast services in the area, we would therefore ask that a protocol be signed between the developer and 2rn should the site go ahead.

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:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>  
**Sent:** Wednesday, October 23, 2024 2:30:22 PM (UTC+00:00) Dublin, Edinburgh, Lisbon, London  
**To:** windfarms <[windfarms@rte.ie](mailto:windfarms@rte.ie)>  
**Cc:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>; Ellen Costello <[ecostello@mkoireland.ie](mailto:ecostello@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>; Johnny Evans <[johnny.evans@rte.ie](mailto:johnny.evans@rte.ie)>  
**Subject:** 200804 - EIAR Scoping Document for Proposed Lemanaghan Wind Farm - 2rn

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Dear Sir/ Madam,

MKO has been appointed as Environmental Consultants on this project and will be preparing an Environmental Impact Assessment Report Statement (EIAR) for the Proposed Development. Please see attached the 2024 Scoping Document providing details of the Proposed Development. As part of scoping, we wish to ensure that all queries, information and comments are captured from relevant consultees.

If you could return any comments, queries, or suggestions at your earliest convenience, it would be much appreciated. If you require any further information, please do not hesitate to contact me.

Kind regards,  
Edel.

**Edel Mulholland**  
Graduate Environmental Scientist

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

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



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Block B, Cookstown Court,  
Old Belgard Road, Tallaght,  
Dublin 24, Ireland  
Tel: +353 (0)1 208 2259  
E-mail: 2rn@2rn.ie

## Protocol Agreement

between

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

and



concerning the wind farm at:

XXXXXXXXXXXXXXXXXXXXXXXXXXXX  
XXXXXXX





Block B, Cookstown Court,  
 Old Belgard Road, Tallaght,  
 Dublin 24, Ireland  
 Tel: +353 (0) 1 208 2259  
 E-mail: 2rn@2rn.ie

“Developer”:  
 Ireland  
 XXXXX  
 XXXX  
 XXXX  
 XXXX

Registered No. XXXXXXXX

“2RN”:  
 RTÉ Transmission Network DAC trading as  
 “2RN”,  
 Montrose,  
 Donnybrook,  
 Dublin 4.

Registered No. 364909

“Development”:  
 Proposed development by way of initial  
 construction or intensification of use of a  
 wind farm at XXXXXXXXXXXX,  
 XXXXXXXXXXXX, Co XXXXXXXX

“Viewer(s)”:  
 Proprietor (or agent of proprietor) of a  
 private residence or business premises  
 where a television set, for which a current  
 television licence is held, is used and/or a  
 broadcast radio receiver.

“Local Dealer”:  
 Local dealer being a television engineer /  
 dealer carrying on business in the vicinity of  
 the development and may be nominated by  
 the wind farm developer.





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### **Interference on Viewers' Television Sets and/or Broadcast Radio Receivers**

1. When 2RN is put on notice, whether by telephone or written communication, that a viewer is having problems with their reception, 2RN will undertake a preliminary assessment, over the telephone or by other means of communication, and ascertain whether or not the wind farm is a likely cause of the interference complained of.
2. If 2RN believes the interference is wind farm related, the viewer will be asked to contact the wind farm developer. Then the developer will arrange for a local dealer to visit the viewer.
3. Both parties to this protocol note that the type of interference caused by electromagnetic disturbance emanating from wind farms manifests itself in very specific ways on television sets and broadcast radio receivers.
4. The local dealer will arrange directly with the viewer to make a visit to the viewer's house and assess the cause of the interference. The local dealer will take whatever steps are necessary to remedy the interference.
5. The local dealer will prepare a brief report in writing which will be sent to the developer. If the local dealer is of the view that the interference is due to interference from the development, the dealer will send an invoice in respect of the site visit and remedial work to the developer. The developer is the party primarily liable for the discharge of any amounts due in respect of any such site visit and remedial work. If the local dealer identifies that the problem is due to some other cause, the local dealer will invoice the viewer in the usual way.
6. Where the reception interference problem affects a number of viewers in the same vicinity, and this is identified by the local dealer and/or 2RN, it may be that it will be necessary for 2RN to develop an existing alternative or additional transposer site within that locality.
7. The developer in this instance will be responsible for all the costs associated with the development of the new transposer site, where this transposer site is necessitated by the presence of the development.
8. The maximum expenditure incurred by 2RN in the provision of the new transposer site (arising from section 6) will be €150,000, (such figure to be index linked upwards only – by reference to the Consumer Price Index published by the Central Statistics Office, calculated on the basis of the average increase over the 12-month period preceding demand for reimbursement by 2RN). A detailed estimate is to be submitted to the Developer in advance for comment, within a reasonable timeframe.



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Dublin 24, Ireland  
Tel: +353 (0) 1 208 2259  
E-mail: 2rn@2rn.ie

9. If the cost of acquiring and developing a new transposer site exceeds the sum of €150,000 the developer and 2RN will enter into negotiations to ascertain how the cost of remedying the problem being experienced by viewers in the locality might most equitably be met. The developer, however, shall be the party primarily liable for the discharge of any amounts due in respect of the acquisition and development of a new transposer site to the extent that such an acquisition and development is attributable to the presence of the development.
10. Where the acquisition and development of a transposer site is additional to the transposer(s) serving the locality prior to the commencement of operation of the development, the developer shall be liable to reimburse to 2RN the ongoing operational costs of the said additional transposer for so long as same shall be necessary to counteract the interference with viewers' reception caused by the development, up to a maximum of €15,000 per annum (such figure to be index linked – upwards only – by reference to the Consumer Price Index published by the Central Statistics Office, calculated on the basis of the average increase over the 12 month period preceding demand for reimbursement by 2RN).
11. The developer will be entitled to see copies of operational costs to the extent that company confidentially is not breached. All the 2RN costs involved in investigation and reports associated with the proposed development shall be covered by the developer if it is found that the said development is the cause of the interference.
12. The developer shall be entitled to retain its own engineer to inspect and report on the source of interference and if a transposer site is built, 2RN undertakes to facilitate access to the installation in question for the purposes of carrying out any such inspection and/or tests necessary.
13. The developer will indemnify 2RN fully in respect of damage to the person or property of any such engineer or inspector as retained by the developer, or any other agent or licensee of the developer involved in or associated with such inspection and/or tests. The developer will ensure that competent personnel only are deployed onto 2RN property under the terms of this clause and hereby indemnify 2RN in respect of any damage to 2RN's property or personnel caused by the negligence of such engineer, inspector or other agent or licensee.



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Dublin 24, Ireland  
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E-mail: 2rn@2rn.ie

**Interference with 2RN installations (to include transmitter stations, transposers and, if applicable, links stations)**

14. Where 2RN detects interference with the reception of a receive and/or transmission signal at a transposer site, 2RN will investigate the cause of the interference and report in writing to the developer if 2RN determines that the interference is attributable in whole or in part to the development.
15. The developer shall be entitled to retain its own engineer to inspect and report on the source of interference and 2RN undertakes to facilitate access to the installation in question for the purposes of carrying out any such inspection and/or tests necessary.
16. The developer will indemnify 2RN fully in respect of damage to the person or property of any such engineer or inspector as retained by the developer, or any other agent or licensee of the developer involved in or associated with such inspection and/or tests. The developer will ensure that competent personnel only are deployed onto 2RN's property under the terms of this clause and hereby indemnify 2RN in respect of any damage to 2RN's property or personnel caused by the negligence of such engineer, inspector or other agent or licensee.
17. Engineers representing both 2RN and (if applicable) the developer, will agree on remedial works (e.g. reorientation of reception antennas, additional filtering, alternative fibre optic connection) and the cost of same. 2RN shall carry out the necessary remedial works and the cost of same shall be discharged/reimbursed to 2RN by the developer (subject to the provisions below).

In the following paragraph, the term "installation" shall mean one or more installation sites if applicable.

18. In the event that an additional or alternative installation is required in order to overcome reception or transmission problems caused exclusively by the development, 2RN shall identify a new location for such installation, within a reasonable timeframe.
19. The developer shall be responsible for all costs associated with the development of the new installation (e.g. repeat broadcasting station), where the new installation is necessitated exclusively because of interference caused by the development. The developer shall be liable for such costs up to a maximum of €150,000 (such figure to be index linked – upwards only – by reference to the Consumer Price Index published by the Central Statistics Office, calculated on the basis of the average increase over the 12-month period preceding demand for reimbursement by 2RN). Where the likely costs of such additional or alternative installation exceed €150,000 (as adjusted), 2RN and the Developer shall negotiate and determine between them how the costs of this new development might most equitably be met.



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E-mail: 2rn@2rn.ie

The projected costs are to be submitted to and agreed with the developer prior to development of the new installation, within a reasonable timeframe.

20. Where the acquisition and development of a transposer site is additional to the transposer(s) serving the locality prior to the operation of the development, the developer shall be liable to reimburse to 2RN the ongoing operational costs of the said additional transposer for so long as same shall be necessary to counteract the interference with viewers' reception caused by the development, up to a maximum of €15,000 per annum (such figure to be index linked – upwards only – by reference to the Consumer Price Index published by the Central Statistics Office, calculated on the basis of the average increase over the 12-month period preceding demand for reimbursement by 2RN.
21. The developer will be entitled to see copies of operational costs to the extent that company confidentially is not breached. All the 2RN costs involved in investigation and reports associated with the proposed development shall be covered by the Developer if it is found that the said development is the cause of the interference.
22. The parties agree that any dispute which arises concerning the interpretation of this Agreement shall first be referred to: -
  - (a) in the case of 2RN, the Executive Director for the time being; and
  - (b) in the case of the Developer, the Executive Director for the time being;and such persons shall use all reasonable commercial efforts to resolve any such dispute within ten (10) Business Days.
23. If the dispute is not resolved by the relevant parties within the time period referred to above then save in respect for a dispute referable to the Expert, the parties may by agreement in writing attempt to settle all other disputes by mediation in accordance with the rules of the International Centre for Dispute Resolution (ICDR). To initiate the mediation a party must give notice in writing to the other party to the dispute requesting mediation and a copy of the request must be sent to ICDR. The mediation will start not later than 20 days after the date of such notice. The commencement of mediation will not prevent the parties commencing or continuing court proceedings. Unless otherwise agreed between the parties
  - (a) the mediator will be nominated by ICDR;
  - (b) the costs of the mediator shall be borne and discharged as to 50% by the Company and as to the remaining 50% by the Developer, and



## David Naughton

---

**From:** Matthew Craig <matthew.craig@2rn.ie>  
**Sent:** Thursday 12 November 2020 11:49  
**To:** David Naughton  
**Cc:** Johnny Evans; windfarms@rte.ie  
**Subject:** RE: 200804 - Proposed Lemanaghan Wind Farm

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

Hi David,

2RN don't have any links in the area, though there is a risk of interference to DTT Coverage from our sites at Maghera, Kippure and Cairn Hill. We would ask that a protocol be signed between 2RN and the Developer should the site go ahead.

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  
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**From:** David Naughton <dnaughton@mkoireland.ie>  
**Sent:** 11 November 2020 14:40  
**To:** Matthew Craig <matthew.craig@2rn.ie>  
**Cc:** Johnny Evans <Johnny.Evans@2rn.ie>  
**Subject:** 200804 - Proposed Lemanaghan Wind Farm

Hi Matthew,

We are working on a constraints study for a proposed wind farm in Lemanaghan, located approximately 3km east of Ferbane and 7km west-southwest of Clara in County Offaly. The approximate grid ref coordinates for the site centre are ITM E616,219 N727,976. A site location map and associated shapefile/KML are attached showing the study area.

Could you let me know please if 2rn has any links in this area, and we will incorporate these into our constraints mapping process. We do not have a turbine layout yet as this will be informed by the constraints study. It is envisaged that the site will accommodate up to 16 no. turbines, although this is just an estimate as of yet.

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

Kind regards,



David Naughton B.Sc. (Env.)  
Environmental Scientist

**MKO**  
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## Edel Mulholland

---

**From:** Matthew Craig <matthew.craig@2rn.ie>  
**Sent:** Friday 14 March 2025 11:04  
**To:** Catherine Johnson  
**Cc:** windfarms; Johnny Evans; Edel Mulholland; Susan Doran  
**Subject:** RE: 200804 - Lemanaghan WF Telecoms Scoping - RTE  
**Attachments:** Lemanghan\_boundary\_2025.02.kml

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Hi Catherine,

We have an off-air link for our DTT services between our sites at Cairn Hill and Kilduff.

Here are the link details, I have attached a kmz file with the first Fresnel zone to this email, could you please ensure that any turbine keeps out of this area.

Please note that our site at Kilduff reaches a possible 14.8% of households (763555)

Link	Site 1								
	Name	Lat	Long	Site Height (m) AMSL	Ant Height (m) AGL	Ant Height (m) AMSL	Name	Lat	Long
CHL_KDF_DTT	Cairn Hill	53.807227	-7.71535	260	132	392	Kilduff	52.83521	-7.909

There is also a risk of interference to our broadcasting services in the area so we would request that a protocol be signed between 2rn and the developer should the site go ahead.

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:** Catherine Johnson <[cjohnson@mkoireland.ie](mailto:cjohnson@mkoireland.ie)>

**Sent:** Friday, March 14, 2025 9:23:51 AM (UTC+00:00) Dublin, Edinburgh, Lisbon, London

**To:** windfarms <[windfarms@rte.ie](mailto:windfarms@rte.ie)>; Johnny Evans <[Johnny.Evans@rte.ie](mailto:Johnny.Evans@rte.ie)>

**Cc:** Edel Mulholland <[emulholland@mkoireland.ie](mailto:emulholland@mkoireland.ie)>; Susan Doran <[sdoran@mkoireland.ie](mailto:sdoran@mkoireland.ie)>

**Subject:** 200804 - Lemanaghan WF Telecoms Scoping - RTE

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Good morning,

We would like to follow up on a scoping exercise that was previously completed for Lemanaghan Wind Farm, Co Offaly. This site had been previously scoped for in 2020 and so we are seeking the most up to date infrastructure to ensure we take into account current telecoms links across the site before freezing our design. Apologies but our previous correspondence on this project is no longer available.

We currently have a 15 no. turbine layout within the site boundary (KML) attached. The centre coordinates for the Lemanaghan WF site is 615912.5, 728040.0 (ITM).

Could you please provide the start and end point (ITM) of all RTE links within 5km of the site, if any? Please also confirm your required setback distance from any potential turbine blade tip and the link.

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

Kind regards,  
Catherine

**Catherine Johnson BSc. LL.M.**  
Environmental Scientist

**MKO**

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