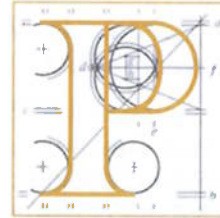


**Our Case Number:** ABP-319307-24  
**Your Reference:** Laurclavagh Limited



An  
Coimisiún  
Pleanála

MKO  
Planning & Environmental Consultants  
Tuam Road  
Galway  
Co. Galway  
H91 VW84

**Date:** 14 May 2026

**Re:** Proposed no 8 wind turbines and associated works.  
Laurclavagh and adjacent townlands, Co. Galway. ([www.laurclavaghplanning.com](http://www.laurclavaghplanning.com))

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 37F(1)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the proposed development.

The following clarification of further information is requested on the basis of the further information presented, the review of submissions undertaken, and your response to observations.

### **Item 1: Ornithology (EIAR & NIS)**

#### **1.1 Black-headed Gull – Collision Risk Assessment Against SPA Population**

Notwithstanding the updated collision risk assessment provided in the EIAR Addendum, the Department of Housing, Local Government and Heritage (DHLGH/DAU), in its post-Further Information submission dated 4 December 2025, has confirmed that the revised NIS continues to contextualise Black-headed Gull collision mortality against county-level population figures rather than against the relevant breeding population of Lough Corrib SPA.

You are requested to provide the following:

- i) A revised collision risk assessment for Black-headed Gull that expresses projected annual collision mortality as a proportion of the Lough Corrib SPA breeding colony population, consistent with the requirements of Percival (2003) as clarified by the DHLGH in its submissions of 9 May 2024 and 4 December 2025.
- ii) Confidence intervals (at minimum 95% confidence level) around all CRM output figures for Black-headed Gull, including both the stochastic and

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extended stochastic model outputs, with a commentary on the implications of the confidence interval for the conclusion of no adverse effect.

iii) Evidence demonstrating whether Black-headed Gulls recorded on or in transit through the proposed wind farm site during the breeding season (April to August inclusive) have been assessed as associated with the Lough Corrib SPA breeding colonies, with reference to the 18.5 km mean maximum foraging range specified in the NPWS conservation objectives for the SPA (NPWS, 2023). If such an assumption is contested you must provide scientific justification to support an alternative population attribution.

iv) Confirmation of the total breeding population figure used as the denominator in the revised CRM and the source documentation for that figure. Where this figure is based on NPWS survey data the relevant survey year and methodology must be cited.

### 1.2 Black-headed Gull – In-Combination Cumulative Collision Risk

The DHLGH has confirmed in its post-Further Information submission that the additive cumulative collision risk assessment for Black-headed Gull requested in the original Further Information request has not been provided.

You are requested to provide the following:

i) An additive in-combination cumulative collision risk assessment for Black-headed Gull, incorporating all wind farm developments (consented, under construction or with applications lodged) whose footprints fall within the 18.5 km mean maximum foraging range of the Lough Corrib SPA Black-headed Gull breeding colonies, regardless of the distance of those developments from the Laurclavagh site. This assessment must present the cumulative projected annual mortality as a proportion of the SPA breeding population.

ii) An assessment of the in-combination effect of the cumulative projected mortality on the ability of the Lough Corrib SPA Black-headed Gull population to maintain or recover to favourable conservation status, with reference to the population viability analysis or equivalent demographic assessment required to support a conclusion of no adverse effect on site integrity under Article 6(3) of the Habitats Directive.

### 1.3 Nocturnal and Crepuscular Bird Surveys

The collision risk modelling for Whooper Swan and for other species with primarily nocturnal or crepuscular activity patterns is based exclusively on daytime vantage point survey data. This represents a potential systematic underestimation of collision fatality for those species whose transit activity is concentrated outside the hours during which surveys were conducted.

You are requested to provide the following:

i) A written assessment of the potential for underestimation of Whooper Swan collision fatality arising from the exclusive reliance on daytime vantage point surveys. This assessment must address: (a) the proportion of Whooper Swan activity at this site that is likely to occur during nocturnal and crepuscular periods, with reference to the known roosting and feeding ecology of the species and the documented use of the surrounding wetland network; (b) the implications of this temporal survey gap for the CRM output and whether the point estimate presented can be considered a reasonable approximation of total risk or represents a lower bound only; and (c) whether you consider additional targeted survey effort necessary to adequately characterise nocturnal collision risk, with clear reasoning provided in either case.

ii) The same assessment must address any other species recorded in the EIAR surveys for which nocturnal or crepuscular activity represents a primary or significant risk period, including Barn Owl, setting out in each case whether the absence of nocturnal survey data affects the reliability of the collision or disturbance assessment for that species.

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## **Item 2: Bats (EIAR & NIS)**

2.1 A bat collision risk analysis should be undertaken based on Table 3-6 and Table 3-7 of the Bat Report (Appendix 6-2). Collision risk analysis should be based on worst case scenarios and the collision risk calculations should be revised, where applicable.

2.2 You should clarify the presence of any Lesser Horseshoe Bat roosts within the site vicinity. Consultation in relation to this matter should be carried out with NPWS and submitted in any response.

## **Item 3: Hydrology / Hydrogeology (EIAR & NIS)**

Having reviewed the application information submitted, including the response to further information, and the response to observations received on the 9th August, 2024, the Commission considers that the material provided does not adequately address nor sufficiently clarify, several matters raised in the 3rd party submissions. In particular, the responses do not provide the level of detail or justification necessary to demonstrate that the issues raised specifically with respect to hydrology and hydrogeology in the 3rd party submissions have been appropriately considered and addressed.

On this basis it is considered that there is lacunae in the information before the Commission and that the evidence presented does not robustly support the lack of potential effects on water supply schemes, the underlying groundwater body, EU protected surface water bodies, Lough Corrib SAC and Lough Corrib SPA, due to: the EIAR being fundamentally based on a hydrogeological conceptual model which dismisses the presence of karst as a risk at the development site; due to site investigations, which do not take into account clear evidence of epikarst; and on the basis of a lack of karst, the water control and drainage system proposed is based on the infiltration of runoff and water generated during construction and operation to ground.

You are requested to provide clarification on the points set out below to resolve the outstanding matters:

### **3.1 Karst Protocol**

The protection of surface works from fast flow karst pathways is critical, and a Karst Protocol to ensure the identification and treatment of karst features is the starting point of effective mitigation. A Karst Protocol is to be provided to include the following:

- i) Appointment of expert
- ii) Formation inspection
- iii) Remedial works – foundations
- iv) Remedial works – earthworks / trenching
- v) Remedial works – roads
- vi) Decision making flow chart

### **3.2 Karst**

i) To assess the presence of mapped karst features on the site layout, the Karst placement of "Pete Coxon's 2005" karst feature map from Meehan et al 2019 "Geoheritage Series Galway – Geological Site Report GY082 Knockmaa" within the site context is to be provided.

ii) To assess the known / interpreted distribution of epikarst and karst features across the whole Site, as well as the turbine pads, site based map / cross sections incorporating karst interpretation from SI and monitoring well drilling, geophysics, walk over surveys and desk study information is to be provided.

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### 3.3 CEMP

It is important that no pollutants enter the limestone aquifer in order to protect public/private water supplies and EU protected sites. Full details are to be provided for the following:

- i) Protection of aquifer. Details of isolation of construction and operational compounds / hardstandings / refuelling locations from underlying aquifer.
- ii) Details of construction and operational compounds / hardstandings / refuelling locations, drainage, monitoring and pollution prevention protocol.
- iii) Details of ensuring contaminated hardstanding is handled appropriately during decommissioning after construction / during restoration.
- iv) Details of excavation management drainage and prevention of silt transport off site or into the ground
- v) CEMP 2.6.5 does not refer to sand blinding, DPM and concrete blinding. For the Protection of aquifer, details of isolation of concrete pouring from underlying aquifer is to be provided.
- vi) Details of treatment train(s) & monitoring to prevent introduction of pollutants into infiltration basins during construction and operation phases.

### 3.4 WC2- River Clare

There are risks associated with loss of drilling fluids and/or collapse of unstable ground to the protected SAC feature.

- i) Details of risk assessment related to weathered limestone (epikarst) / karst / gravel and HD below river bed is to be provided.

### 3.5 Lough Corrib

Groundwater level data shows that Lough Corrib is the hydrological base and is down hydraulic gradient of the site. Drainage management is described as infiltration.

- i) Provide for the incorporation of Lough Corrib as a receptor in the risk assessment, including quantitative risk analysis of potential contamination.

### 3.6 Clough Cummer GWS

- i) To ensure protection of the GWS, provide details of this receptor and its incorporation into the risk assessment.

### 3.7 PWS

- i) Drainage management is described as infiltration, and the submitted analysis does not take account of groundwater flow directions based on submitted groundwater contours. Provide a quantitative risk assessment of contamination, including suspended solids, to PWS including private wells based on appropriate conceptual model, epikarst flow paths, karst flow paths, groundwater flow directions and groundwater velocities.

### 3.8 Groundwater level data

- i) To allow interpretation of water level data, provide a plan showing location and names of groundwater level monitoring locations.

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### 3.9 Conceptual cross sections

i) To support understanding of hydrogeological connectivity to EU protected features and water supplies, provide conceptual cross sections illustrating the hydrogeology between River Clare and Lough Corrib, passing through the site, including groundwater levels, epikarst, primary karst elevations, PWS and SPAs.

### 3.10 Conceptual model map

i) To support understanding of hydrogeological connectivity to EU protected features and water supplies, provide a map showing groundwater level contours and groundwater flow directions extending to, and illustrating interaction with, River Clare in the east and Lough Corrib in the west, Luirnagh PWS.

### 3.11 Drainage

i) To ensure capacity of drainage elements is sufficient, provide design calculations for drainage element designs, including extreme rainfall event analysis.

## **Item 4. Response Format & Timeframe**

4.1 The above points of further information should be addressed by way of an addendum to the EIAR, and a revised NIS including the AA Screening Report as relevant and should clearly indicate where changes to the original documents, and documents submitted at initial further information stage, are made.

Additionally, please find enclosed a soft copy of the submissions made in relation to the further information previously received, for information purposes only.

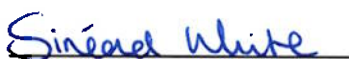
The further information referred to above should be received by the Commission within 6 months from the date of this notice (i.e. no later than the 14<sup>th</sup> of November 2026).

In this regard, please submit 2 hard copies and one electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 37F(2) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,



Sinead White  
Executive Officer  
Direct Line: 01-8737202

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