
CARRAIGIN POWER LTD

CARRIGEEN RENEWABLE ENERGY DEVELOPMENT, CO. ROSCOMMON

RESPONSE TO SUBMISSIONS

**PLANNING APPLICATION CASE REFERENCE:
PAX20-324167**

July 2026



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CARRIGEEN RENEWABLE ENERGY DEVELOPMENT

RESPONSE TO SUBMISSIONS

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1 **INTRODUCTION**

Jennings O'Donovan & Partners Limited with support from Headland Archaeology and Doherty Environmental have been instructed by Carraigin Power Limited (the Applicant), to prepare a response to the request issued by An Coimisiún Pleanála (the Commission) dated 12th June 2026. This document sets out the Applicants response to the submissions from third parties and prescribed bodies to assist the Commission in their assessment of the planning application (the Application) together with these submissions.

The request was made in relation to the Strategic Infrastructure Development (SID) planning application before the Commission for consideration (ref: PAX20-324167) in relation to the proposed Carrigeen Renewable Energy Development and other associated works located in various townlands in County Roscommon (<https://carrigeenplanning.com/>).

It is noted that the Application lodged included a robust Environmental Impact Assessment Report (EIAR), including associated EIAR appendices, Natura Impact Statement (NIS) and a suite of drawings.

This response to submissions document comments firstly on an observation from a Third Party which have been categorised into themes, followed by commentary on observations from Prescribed Bodies and finally deals with observations made by the local authority, Roscommon County Council.

The list of Third Party and Prescribed Bodies submissions is set out hereunder:

- 1) Florence Kearney (Third Party)
- 2) Department of Housing, Local Government and Heritage
- 3) Health and Safety Authority
- 4) Health Service Executive National Environmental Health Service
- 5) Office of Public Works
- 6) Irish Aviation Authority
- 7) Transport Infrastructure Ireland
- 8) Uisce Éireann
- 9) Roscommon County Council

Table 1.1 outlines the 9 No. submissions that were received by the Commission, along with the themes specified in each submission.

Table 1.1 Outline of all the Valid Observations Received by the Applicant.

No.	Submission by	Section	Themes Included
1	Florence Kearney on behalf of the Concerned Residents	Third Party Observer	Habitats, geological and hydrogeological environment – dewatering, conservation, restoration, European Sites, Site selection, Planning Policy, Cultural Heritage, Ornithology, geotechnical assessment of joint bays.
2	Department of Local Housing, Local Government and Heritage	Prescribed Bodies	Recommended Conditions, Archaeological Requirements, Nature Conservation.
3	Health & Safety Authority	Prescribed Bodies	No objections.
4	Irish Aviation Authority	Prescribed Bodies	Recommended Conditions, Consultations and Engagement.
5	HSE National Environmental Health Service	Prescribed Bodies	Human health, opportunities for health gain, climate change, Sustainable Development Goals, Noise & Vibration, Peat Depths, Soils & Geology, Hydrology & Hydrogeology, Policy, Shadow Flicker, Food Safety and Environmental Compliance, Construction Environmental Management Plan, Recommendations.
6	Office of Public Works	Prescribed Bodies	Rathcroghan Plateau cultural landscape and setting, A reliance on vulnerable trees to screen the view of turbines,

No.	Submission by	Section	Themes Included
			Assessing the planning application methodology, including against UNESCO guidelines, OPW Comments on Cultural Heritage Viewpoints, Assessment System and Outcome.
7	Transport Infrastructure Ireland	Prescribed Bodies	Recommended Conditions.
8	Uisce Éireann	Prescribed Bodies	Recommended Conditions
9	Roscommon County Council	Local Authority	The concerns raised are grouped as follows: Local Planning Policy: RCC considers the justification insufficient for locating the project in a 'Less Favoured' area rather than a 'Most Favoured' zone, meaning it may not comply with the Renewable Energy Strategy and Development Plan policies. There are also concerns that the Project underestimates impacts on the Rathcroghan Archaeological Complex, particularly in terms of landscape, cultural heritage, tourism, and potential implications for its UNESCO World Heritage bid. Roads Department: Recommend Conditions. Heritage Office: The Heritage Impact Assessment is questioned for downplaying the

No.	Submission by	Section	Themes Included
			significance of the wider Rathcroghan landscape in the UNESCO context. The precautionary principle is advised, and potential negative impacts on Cloonshanville Friary are highlighted. Additional Council Resolutions: These reinforce the importance of protecting Rathcroghan and raise ecological concerns, particularly regarding the River Breedoge and boglands affected by the Project.

1.1 **Background to the Project**

Planning permission is being sought by the Applicant for the construction of 11 no. Wind Turbines, Turbine Foundations, Turbine Hardstands, Site Access Roads, a Permanent Met Mast, Onsite Substation, Internal Cabling, Temporary Construction Compounds, Grid Connection and all ancillary and associated works.

The EIAR Boundary is located in the townlands of Leggatinty, Carrigeenacreeha, Scor Beg, Cartron, Ryefield Or Runnateggal, Lismacool, Ballynahowna, Caranlea, Killummod, Culleenatreen Or Flagford, Cartruncaran, Lodge, Ballyculleen, Carrigeen, Ballaghcullia, Ballindrehid, Corbally East, Peak, Gortnacloy, Tonaknick, Ballysundrivan, Caran, Cloonkerin, Ballyhollaghan, Carrowntogher, Corbally Middle, Ballyroddy, Cloonshanville, Skeanavart, Carrowreagh, Dacklin, Runnacocka, Kinclare, Erriblagh, Lisgarve, Drummin, Loughbally, Moheedian, Rathardeagher, Carrigeenynaghtan, Brackloon, Edenan And Kinclare, Kilnamryall, Corbally West, Cartroncarrowntogher, and Carrowncaran.

The Project will consist of the provision of the following:

- The proposed development will comprise:
- 11 no. wind turbines with an overall turbine tip height of 185m, turbine hub height of 103.5m, and rotor blade diameter of 163m and a meteorological mast with a height of 30m, and subsequent decommissioning of the wind turbines and meteorological mast,

following a 35-year operational period from the date of full commissioning of the wind turbines;

- Associated wind turbines and meteorological mast foundations and hardstanding areas,
- A 110kV substation compound (Including control buildings (with a combined floor area of 594Sq.m) with welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, lightening protection poles, underground wastewater holding tank, site drainage and all ancillary works);
- Underground electrical (110kV) and communications cabling from the proposed 110kV substation to the existing Flagford 220kV substation (including joint bays, communication chambers, earth sheath links, and ancillary works along the underground electrical cabling route). This cabling route is primarily located within the public road corridor;
- Underground electrical (33kV) and communications cabling connecting the wind turbines and meteorological mast to the proposed 110kV substation;
- 6 no. temporary construction compounds (including site offices and welfare facilities,
- Junction accommodation works to facilitate construction access and turbine delivery to the site (off the existing N5 and new N5 national road, and L5642 and L1217 Local Roads), including a new temporary access road off the existing N5 to the L56402,
- Upgrade of existing roads/ tracks and provision of new site access roads, junctions and hardstand areas (including of the L1217, L56402, L5642, L56421, L56492 and L56491 Local Roads), including new gated site entrances at each junction,
- 2 no. Borrow Pits;
- Peat & Spoil Management;
- Site Drainage;
- Tree felling and vegetation removal;
- Biodiversity enhancement measures;
- Operational stage site signage; and
- All associated site development works and apparatus.

A 10-year planning permission and 35-year operational life from the date of commissioning of the Project is being sought. The Onsite Substation and Grid Connection will be under the ownership of ESB Networks and will form a permanent part of the national grid infrastructure, which will not be Decommissioned with the wind farm at the of its operational life.

1.2 **Defined Terms**

For consistency the same defined terms as used in the Application (Refer to Section 1.2 of Chapter 1: Introduction of the EIAR) are used within this response.

2 **RESPONSE TO THIRD PARTY OBSERVATIONS**

There was 1 no. submission received to the Application from a Third-Party observer. The submission itemised 10 individual points with some cross over of discussion therein. The common themes identified within these 10 points are as follows:

- Biodiversity/ Local Ecology/Ornithology
- Local Planning Policy
- Cultural Heritage
- Geotechnical Investigations
- Grid Connection Route
- Hydrology/ Hydrogeology/ Soils & Geology
- Author Experience

These seven common themes from the Third-Party submission are responded to in the following sub-sections 2.1 to 2.7, with reference to each of the 10 numbered points also referenced at the outset.

2.1 **Biodiversity/ Local Ecology/Ornithology**

Points 1, 2 and 5:

The Third-Party submission highlights a number of ecological concerns which are broken down into subheadings below and addressed.

2.1.1 Cloonshanville Bog SAC

Although the EIAR boundary overlaps with Cloonshanville Bog SAC, this is just an arbitrary boundary prepared for the purposes of the Application. No elements of the Project are proposed to be undertaken within the Cloonshanville Bog SAC. As stated in:

- EIAR Section 6.4.2 of Chapter 6: Biodiversity:

'No elements of the Wind Farm Site or Grid Connection permanent or temporary infrastructure are located within the boundary of any European Sites, NHAs or pNHAs. There will be no direct effects, in terms of direct habitat loss, damage or disturbance on any designated conservation area as a result of the construction phase of the Project; the provision of the Grid Connection cable along the public road between the Onsite Substation and the 220kV

substation at Flagford; or the provision of the temporary widening areas along the Turbine Delivery Route from Galway Port.'

- NIS at Section 6.1.1

'The Project EIAR Boundary overlaps the Cloonashanville Bog SAC. However, this is an arbitrary boundary prepared for the purposes of the planning application. No elements of the Project are proposed to be undertaken within the Cloonashanville Bog SAC. The nearest infrastructure element of the Project to the SAC boundary is located approximately 125m to the south. As such there will be no potential for the Project to result in direct impacts, in the form of habitat loss or damage, to the SAC and its qualifying feature of interest.'

As such there will be no potential for the Project to result in direct impacts, in the form of habitat loss or damage, to the SAC and its qualifying feature of interest. Indirect impacts, such as groundwater impact etc., have been identified and assessed in the NIS (Section 6.1.2) and in the EIAR Chapters (e.g. Section 6.4; 8.5; 9.4; 10.4; 11.7 etc.). Mitigation measures have been set out in the NIS and the EIAR Chapters (e.g. Chapter 6: Biodiversity, Chapter 8: Ornithology, Chapter 9: Aquatic Ecology, Chapter 10: Soils & Geology, Chapter 11: Hydrology & Hydrogeology) and will be put in place during the construction and operational phases of the Project. On the basis that all mitigation measures are implemented in full, the risk of adverse effects posed by the Project to the qualifying features of interest for the Cloonashanville Bog SAC and any other European Sites in the wider surrounding area will be eliminated.

It is therefore considered that this has been fully considered as part of the EIAR and NIS and no impacts are anticipated to arise as a result of the Project.

2.1.2 Annex I Species (Hen Harrier & Whooper Swan)

Chapter 8: Ornithology of the EIAR addresses potential effects from the Project on ornithological features; specifically on bird populations and their habitats within and adjacent to the Wind Farm Site, and on relevant ornithological qualifying and supporting interests of nearby designated sites. Impacts from the Project are assessed during the construction, operational and Decommissioning phases, both in isolation and in combination with other plans and projects. As part of the ornithological assessment extensive field surveys were conducted over four years (April 2022 to September 2025) to identify the bird species using the site and its surroundings.

As discussed, and assessed in Chapter 8: Ornithology, no Hen Harrier breeding sites or winter roost site have been identified as occurring within the Wind Farm Site or within a 500m buffer

zone of the Wind Turbines or associated infrastructure. Similarly, Whooper Swan was not recorded relying on the habitats occurring within or adjacent to the Wind Farm Site during field surveys. Chapter 8 assesses the potential effects on both Hen Harrier and Whooper Swan (amongst others) from the proposed Project during construction and operation, both in isolation and in the cumulative sense, under the headings of habitat loss, disturbance/displacement, collision, and displacement/barrier effects.

As stated further in Chapter 8: Ornithology:

'All Wind Turbines and associated infrastructure will be located within either conifer plantation or peatland habitats that are cutover and subject to turbary activity. No hen harrier was recorded breeding at or in the immediate vicinity of any of the proposed Wind Turbines during field surveys. No hen harrier roost sites were recorded within the FSA or surrounding area during field surveys.'

'Whooper swan was not recorded relying on the habitats occurring within or adjacent to the Wind Farm Site during field surveys. This species was recorded flying over or adjacent to the Wind Farm Site. Given the absence of any reliance by this species on habitats occurring within the Project, the habitat loss associated with the Wind Farm Site will not represent a significant effect to this species.'

With respect to the potential for the Project to pose a risk of collision to Hen Harrier and Whooper Swan a collision risk assessment (EIAR Chapter 8: Ornithology and Appendix 8.1: Collision Risk Modelling) has been completed for both species, as well as other target species identified during baseline bird surveys. The collision risk assessment is based on current best scientific practice (Band, 2024). Based on the significant baseline ornithological survey effort (spanning 7 no. bird seasons) the collision risk assessment found that the annual collision risk posed by the Project to Hen Harrier will be zero to the fourth decimal place whilst the annual collision risk posed by the Project to Whooper Swan will be 0.0039 (Table 9 of Appendix 8.1: Collision Risk Modelling).

Chapter 8: Ornithology concludes that:

'With the full implementation of all mitigation measures set out in this Chapter, and particularly construction phase mitigation for breeding birds, it is considered that the significance of the predicted effects on birds as a result of the Project will range from Imperceptible to Low.'

And:

'During the operational phase of the Project, birds may show some avoidance of suitable habitat as a result of the presence of Wind Turbines and will be at some risk of collision with Wind

Turbines. With mitigation in place, the significance of residual effects will range from very low to low. The baseline surveys did not identify any regular migration routes or local movements of wetland bird species through the Wind Farm Site. The Project is not expected to have any residual impact on migrating species or local wetland bird populations.'

In view of the baseline ornithological surveys, the assessment of habitat loss, disturbance, collision and barrier effects informed by the results of these surveys, the conclusions set out in Chapter 8 provide robust findings informed by best scientific methods to establish baseline conditions and impact assessment.

2.2 Local Planning Policy

Point 3:

The Project falls within an area designated as 'Less Favoured' within the Roscommon County Development Plan 2022-2028. The rationale for this is discussed in **Section 4.1.1** below.

2.3 Cultural Heritage

Point 4:

Rathcroghan Archaeological Complex is discussed in **Section 4.1.3** below.

2.4 Geotechnical Investigations

Point 6:

Chapter 10: Soils & Geology of the EIAR evaluates the effects of the Project arising from the construction, operation and Decommissioning phases on soils and geology. The geological assessment for the Project was based on desk studies, walkover surveys and site investigations.

The process outlined in the EIAR Chapter 10: Soils & Geology identified soils and geology receptors that could potentially be affected by the Project. Potential effects on the soils or geology environment were identified, with the following receptors and scenarios taken forward to the assessment stage for determination of appropriate mitigation.

An assessment of cumulative impacts was also undertaken, and it was concluded that there are no predicted significant effects to soils and geology arising from the Project in conjunction with any other pre-existing or consented development.

The EIAR clearly identifies the anticipated foundation types for each Wind Turbine and explains the engineering rationale for their selection based on the site investigation already undertaken.

The reference to post-consent confirmatory site investigations reflects standard engineering practice for major infrastructure projects. Such investigations are undertaken to verify detailed construction parameters and to refine the final engineering design. They do not indicate that the environmental assessment has been deferred or that the project design is uncertain.

The Applicant has already completed sufficient site investigations to establish the feasibility of the proposed Turbine Foundation types and to assess the likely environmental effects of the Project. The confirmatory investigations referred to in the EIAR are intended to verify local ground conditions prior to construction and to ensure that the detailed foundation design remains consistent with the environmental mitigation measures assessed within the EIAR and NIS. This represents a refinement of construction methodology rather than a material alteration to the assessed Project.

The EIAR and NIS are supported by extensive ecological, hydrological, geological and geotechnical surveys undertaken over multiple seasons. The baseline information is sufficient to assess the likely significant effects of the Project. Confirmatory geotechnical investigations do not replace or defer baseline environmental surveys, they ensure that detailed construction design remains consistent with the assumptions already assessed.

The information submitted is sufficient to allow the competent authority to undertake Appropriate Assessment and to determine the Application. The Third Party submission has not identified any specific ecological pathway or scientifically supported mechanism by which the proposed confirmatory investigations would undermine the conclusions of the Appropriate Assessment or result in adverse effects on the integrity of any European site.

2.5 Grid Connection Route

Point 7:

As discussed and assessed in detail throughout the EIAR the proposed Grid Connection has been designed as an underground cable primarily located within the existing public road corridor. This approach minimises land take, avoids fragmentation of agricultural holdings, and limits impacts on sensitive habitats by making use of existing transport infrastructure. The route, construction methodology and associated environmental mitigation measures have been comprehensively assessed within the EIAR and NIS.

The construction of underground utility infrastructure within public roads is a well-established engineering practice routinely undertaken throughout Ireland for electricity, telecommunications, water and gas infrastructure. Such works are carried out in accordance with established

engineering standards, temporary traffic management requirements, and road authority specifications.

Joint bays are standard components of underground high voltage cable systems. As stated in Chapter 10: Soils & Geology, Section 10.4.2.3.7:

'Approximately 17.5km Grid Connection trenches will be excavated along the route between the proposed Onsite Substation and the 220kV Flagford Substation. The trenches will primarily be located within the existing public roads or the adjacent verges, to a proposed depth of 1.30m, depending on confirmatory investigations, with a small section exiting the Onsite Substation located adjacent to Site Access Roads. Excavation of road surface, topsoil and mineral soils will be required.'

All excavations arising from the Grid Connection trenches will be disposed of to a licenced waste facility. The effects associated with excavations for cable trenches (Degradation of soil structure, changes to drainage regime, reduction in soil fertility and reduced stability) are Permanent, Adverse and Not Significant.

In EIA terms, the effect is considered as Not Significant.'

The Applicant is required to reinstate all roads, verges and drainage infrastructure to the satisfaction of Roscommon County Council (RCC) following completion of the works. Temporary construction impacts on road infrastructure are therefore managed through established engineering controls and compliance with relevant local authority standards.

2.6 Hydrology/Hydrogeology/Soils and Geology

Point 8 & 9:

The Applicant acknowledges that the Project is located within the wider Breedoge catchment. This relationship has been comprehensively assessed in Chapter 11: Hydrology and Hydrogeology, Chapter 6: Biodiversity, Chapter 9: Aquatic Ecology, Appendix 11.3: Water Framework Directive Assessment, and the NIS. As stated in the NIS and discussed further in **Section 3.1.2** below, the Project will not have the potential to alter hydrogeological conditions at the Cloonshanville Bog SAC.

The Appropriate Assessment process, as required under Article 6(3) of the Habitats Directive, specifically examines whether the Project, either alone or in combination with other plans or projects, could adversely affect the integrity of any European site, including Cloonshanville Bog

SAC. As discussed in **Section 2.1** above there is no potential for direct or indirect impacts on the integrity of Cloonshanville Bog SAC arising from the Project once mitigation measures are implemented.

Karst features within the EIAR Boundary are assessed in Chapter 10: Soils & Geology. As stated in Chapter 10: Soils & Geology, Section 10.3.5:

'no dissolution /karst features such as sinkholes, subterranean watercourses or significant springs were recorded by GSI within the Wind Farm Site and limited evidence was observed during the site walkover surveys. Geophysical investigation carried out to screen for the presence of karst at the main infrastructure, observed significant weathering at the original location for the T6 Wind Turbine, resulting in its relocation. Refer to Figures in Appendix 10.1. None of the other locations recorded such features. Following the geophysical surveys and adjustment of the wind farm layout, the risk relating to karst features was re-assessed to be low. (Refer to Figures A3 and A3-1).'

The author(s) of Chapter 6: Biodiversity, Chapter 9: Aquatic Ecology, Chapter 10: Soils & Geology, and Chapter 11: Hydrology and Hydrogeology, are all suitably qualified and possess the necessary expertise to assess such topics (full author experience are discussed in **Section 2.7** below).

2.7 EIAR Author Experience

Point 9 &10:

The EIAR has been prepared by suitably qualified and experienced specialists in the relevant disciplines, following the guidelines within the EIA Directive (2014/52/EU), as transposed in Ireland under the Planning and Development Act 2000 (as amended) (the 'PDA 2000'). As stated in Directive 2014/52/EU:

'Experts involved in the preparation of environmental impact assessment reports 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.'

The EIAR is supported by Appendix 1.1: Author Qualifications, which lists the qualifications and years' experience for each chapter author. A statement of authority is also provided in each specialist chapter providing an overview of the relevant experience for each author.

3 RESPONSE TO PRESCRIBED BODIES OBSERVATIONS

3.1 Department of Housing, Local Government & Heritage

Department of Housing, Local Government & Heritage (DoHLGH) raised some observations which can be grouped into the following points:

- Archaeology
- Nature Conservation
- Habitat Loss and Enhancement

3.1.1 Archaeology

An observation was made by the DoHLGH referring to the presence of unknown sub-surface archaeological features or deposits within the proposed Wind Farm Site which may be impacted by the proposed Project. The DoHLGH recommends 4 no. planning conditions related to implementation on planning conditions, pre-development archaeological testing, a CEMP, and a provision of a final Archaeological Report following completion of works.

The Applicant is committed to adhering to the recommended 4 no. conditions listed by the DoHLGH, should the Application receive a grant of permission.

3.1.2 Nature Conservation

The DoHLGH noted there is potential of a hydraulic connection between the proposed Wind Farm Site and Cloonshanville Bog SAC, with potential for hydrogeological interaction.

A comprehensive EIAR, Screening Report for Appropriate Assessment and NIS has been prepared as part of the Application, which fully assesses the potential for hydrological and hydrogeological connection between the Project and the SAC. The potential for hydrogeological pathways to function as impact pathways between the Project and Cloonshanville Bog SAC and Bellanagare Bog SPA were in the Screening Report for Appropriate Assessment. Section 6.1.2.1 and Section 6.3.2 of the NIS examine the potential for the Project to result in hydrogeological effects to these two no. European Sites. In both instances the examination has found that the Project will not have the potential to alter hydrogeological conditions at the Cloonshanville Bog SAC and the Bellanagare Bog SPA.

Following detailed assessment, the NIS concludes in Section 9 that: NIS '*A range of mitigation measures have been prescribed that, once implemented in full, will remove the risk of adverse effects posed by the Project to these qualifying features of interest for the Cloonshanville SAC, the Bellanagare Bog SPA, the Lough Gara SPA, and the River Moy SAC.*' These mitigation measures are listed in Section 7 of the submitted NIS.

It is further noted that Biodiversity Enhancement Management Plan (BEMP) prepared for the Project sets out commitments for the long-term enhancement and restoration of raised bog habitat to the south of the L1217 local road separating the Project from the Cloonshanville Bog SAC. The successful delivery of the raised bog restoration in this area will have the potential to decrease water loss from areas fringing the Cloonshanville Bog SAC. As set out in the NIS a restoration project is ongoing at Cloonshanville Bog SAC which seeks to eliminate artificial water loss from the raised bog habitats of the SAC. These restoration efforts will aim to restore hydrological conditions at the SAC site level. It is noted that the SAC sits in an area described by Kelly (1995) as a regional discharge zone. As such the efforts to be implemented as part of the Project to restore further areas of raised bog habitat, outside of but local to the SAC, will have the potential to contribute towards the positive hydrological balance in areas buffering the SAC and reduce levels of overall regional discharge.

3.1.3 Habitat Loss and Enhancement

The DoHGLH refers to the loss of 2 ha of raised bog associated with the Project. It is noted that the c. 2 ha of raised bog habitat to be lost to the footprint of the Project is representative of cutover raised bog habitat not capable of natural regeneration. As stated in the EIAR at Section 6.5.2.1 of Chapter 6: Biodiversity, it is proposed to include habitat enhancement to mitigate this loss *'In order to mitigate the loss of c. 2 Ha of cutover raised bog to the footprint of the Project an area of degraded raised bog habitat surrounding the Wind Turbine T01 and to the south of the Wind Turbine T09 will be subject to peatland habitat rehabilitation. Approximately 26 Ha of raised bog habitat will be subject to habitat management and enhancement measures. The enhancement and rehabilitation measures to be implemented for these areas of degraded raised bog are set out in the Biodiversity Enhancement and Management Plan (BEMP) (see Section 6.8 & Appendix 6.2).'*

The DoHGLH also draws attention to land management practices proposed by the Applicant to prevent damaging land management activities associated with turbary and agricultural practices and how the proposed management practices will be enforced. As stated within the EIAR *'the Applicant will prevent ongoing damaging land management practices during the lifetime of the Project within the BMEP areas'*. Within Appendix 6.2: BEMP of the EIAR, Table 6.2 outlines an Action Plan for the implementation of habitat management actions to restore, enhance and manage habitats within the BEMP Area.

With respect to enforcement of the BEMP Actions it is stated at Section 1 of the BEMP that:

"The wind farm operator will, throughout the lifetime of the Project, ensure the implementation of the actions specified within the BEMP. Pursuant to the terms and conditions of the lease

agreements on site, the landowners must comply with all necessary actions and precautions required by the Project operator for the implementation of this BEMP.”

The DoHLGH notes that the status of further activities outside of these BEMP areas has also not been clarified, which may have the potential to impact the efficacy of such measures within the enhancement areas.

To clarify the BEMP has been prepared for the areas identified in Figure 1.1 of the BEMP.

BEMP Area 1 has been selected with the overall aim of restoring raised bog habitat at a location in close proximity to the Cloonshanville Bog SAC. This area is considered to represent a “contained” area that is delimited to the north by the L1217 local road, the south by the Carricknabraher River, the west by the landholding boundary to the east by existing cutover raised bog and the proposed floated Site Access Roads. The BEMP identifies historical drainage, turbary and peat-cutting activities as the principal causes of habitat degradation and sets out a programme of restoration measures, including ditch blocking, cut-cell infilling, rewetting and the prevention of further damaging land management activities within lands under the Applicant’s control.

BEMP Area 2 has been selected with the overall aim of enhancing and augmenting the extent of native broad-leaved woodland within this area. It is considered that land use activities, in adjacent areas outside of the control of the Applicant will not have the potential to undermine the aims and targets of the BEMP actions set out for BEMP Area 2.

BEMP Area 3 is selected with the overall aim of establishing native broadleaved woodland and hedgerow habitat. The BEMP Area 3 will be managed and controlled to ensure the successful establishment of woodland and hedgerows. It is considered that land use activities outside of the BEMP Area 3 will not have the potential to undermine the successful establishment of woodland and hedgerow habitat.

BEMP Area 4 is selected with the overall aim of maintaining and enhancing species-rich wet grassland habitat. The BEMP Area 4 is surrounded by existing drains bounding it to the north, south, east and west. The existence of these drains will provide barriers to the effects of any unsympathetic land use activities that may be undertaken in adjacent lands. It is further noted that the lands in all directions surrounding this BEMP are already modified and drained, supporting conifer plantation and improved agricultural grassland. In view of the presence of existing boundary drains and the existing modified and drained nature of surrounding lands, any unsympathetic land use activities in adjacent lands are not considered to have the potential to undermine the aims and targets set out for BEMP Area 4.

BEMP Area 5 is selected with the overall aim of enhancing raised bog habitat by restoring hydrological conditions. This area is considered to represent a “contained” area that is delimited to the west by an existing turbary track where the peat substrate has been compacted, to the south and east by an existing conifer plantation boundary drain, to the north by scrub. The existing track and drains to the west, south and east will provide barriers to the effects of any unsympathetic land use activities that may be undertaken in lands to the south, west and east. It is only to the north of this area where scrub on contiguous peat substrate occurs. Whilst the Applicant will not have control of land use in lands to the north of the BEMP area it is noted that on the basis of site investigation and a review of historical satellite imagery, there is no evidence of recent land use activities that are damaging to peat substrate and the aims and targets of the BEMP actions set out for BEMP Area 5. Therefore, on the basis of continued land use practices in this area, it can be concluded that no activities to the north of this BEMP area will have potential to undermine the aims and targets for this BEMP Area.

3.2 Health & Safety Authority

The Health and Safety Authority (HSA) stated the application is outside the scope of Regulation 24(2), therefore the HSA had no observations to forward.

3.3 Health Service Executive National Environmental Health Service

An observation was made by Health Service Executive (HSE) National Environmental Health Service (NEHS) observations regarding proposed conditions to protect public and environmental health, especially regarding noise, water, soil stability, and shadow flicker.

The proposed conditions by HSE NEHS are as follows:

Noise Management

- A noise curtailment strategy shall be implemented during the construction phase and made a condition of consent.
- Construction activities shall not operate outside the following hours, except in exceptional circumstances and subject to prior approval from RCC:
 - Monday to Friday: 07:00 – 19:00
 - Saturday: 08:00 – 13:00
 - Sundays and Public Holidays: No noisy operations permitted
- In relation to rock breaking activities, measures shall be implemented to minimise noise propagation, including:
 - Construction of berms or mounds

- Use of mitigation techniques to absorb or deflect noise away from sensitive receptors

Soils and Geology

- The mitigation measures outlined in Chapter 10 (Soils and Geology) of the EIAR shall be fully implemented and included as conditions of consent, including:
 - Section 10.5.2.3
 - Table 10.24
 - Appendix 10.3 (Part I)
 - CEMP Management Plans 1 and 4
 - Chapter 22 – Table 22.1

Hydrology and Hydrogeology

- The mitigation measures described in Chapter 11 (Hydrology & Hydrogeology) shall be implemented and included as conditions of consent, including:
 - Appendix 11.1 Flood Risk Assessment (Section 5.3)
 - CEMP Management Plans 2 and 3
 - Chapter 22 – Table 22.1

Shadow Flicker

- In the interest of protecting public health, the mitigation measure MM88 (Chapter 22) shall be implemented. This shall align with the Draft Revised Wind Energy Development Guidelines (2019) and ensure no shadow flicker impacts at sensitive receptors.

Food Safety Compliance

- Any food preparation or catering facilities associated with the development shall: Be registered in accordance with Article 6(2) of Regulation (EC) No. 852/2004 Engage early with the relevant authority to ensure compliance with food hygiene legislation.

Tobacco Legislation

- Early engagement shall be undertaken with the appropriate authority to ensure compliance with Tobacco legislation, particularly in relation to smoking shelters within temporary construction compounds.

The Applicant is committed to adhering to the HSE NEHS conditions, should the application receive a grant of permission.

3.4 Office of Public Works

The Office of Public Works (OPW) raised a number of observations which can be grouped into the following headings:

- Rathcroghan setting and cultural landscape
- Reliance on forestry and trees for screening

- Request for Arboricultural and Hedgerow assessment
- The Relationship between Heritage Impact Assessment (HIA) and Landscape and Visual Impact Assessment (LVIA)
- UNESCO guidelines and Methodology
- Caran Fort photomontage omission
- Omission of view from the northern section of Rathcroghan Plateau
- Impact Rating

3.4.1 Rathcroghan Setting and Cultural Landscape

The OPW carried out a viewshed analysis from a central observer point on Rathcroghan mound, which showed potential visibility as far as Keash/Keshcorran Co. Sligo. The OPW notes a shared regional landscape connection between Rathcroghan and Keash. The OPW lists a statement within the HIA: *'beyond supporting an appreciation of the complex's elevated landscape in outward views from the north, that the wider landscape of Rathcroghan plays a rather limited role in supporting potential Outstanding Universal Value (OUV).'*' (5.1.7) the OPW responds that the views looking north beyond the proposed Wind Turbines are views of Keash/Kish and the Bricklieve Mountains, a landscape with intangible cultural heritage connections.

The main opinion points from this OPW observation are as follows:

- The significance of views from Rathcroghan towards Keash/Keshcorran and the Bricklieve Mountains are underestimated.
- The wider landscape contributes to potential OUV.
- Wind Turbines may interfere with these cultural and visual relationships.

The OPW's position appears to extend the scope of intangible heritage beyond that which can be demonstrated to contribute to the potential OUV of Rathcroghan. While it is accepted that wider regional folklore establishes broad cultural associations between Rathcroghan and locations such as Keshcorran and the Bricklieve Mountains, these associations are not spatially or functionally embedded within the Rathcroghan complex itself.

By contrast, the mythological framework underpinning Rathcroghan's potential OUV, centred on the Ulster Cycle, Queen Medb, Táin Bó Cúailgne and the Táin Bó Fraích, and the Otherworld associations of features such as Oweynagat, is directly and demonstrably tied to the monuments and landscape of the complex. It is this coherence between narrative, place, and physical expression that is critical in defining potential OUV.

Long distance intervisibility of the Bricklieve Mountains and Keshcorran and later traditions suggesting regional connections between these landscape features and Rathcroghan do not establish that such relationships form part of the attribute set through which potential OUV is conveyed.

Accordingly, while the wider cultural landscape provides context, there is no robust basis for concluding that distant features such as Keshcorran or the Bricklieve Mountains make a meaningful contribution to the potential OUV of Rathcroghan. The HIA's focus on the demonstrable role played by mythology in supporting potential OUV is therefore appropriate and consistent with established UNESCO guidance.

The impact of the proposed Wind Turbines on the role played by myth and legend, insofar as these pertain to potential OUV, has therefore been appropriately assessed in the HIA.

3.4.2 Reliance on Forestry and Trees for Screening

The OPW states that the HIA assesses photomontages which rely on forestry and trees that may be harvested, damaged by storms, or lost through ash dieback, therefore the visual impacts are understated in relation to the overall OUV. The OPW states that the HIA 'dismisses any significant degree of impact on potential OUV in the event that the trees are felled'.

The EIAR adopts a comprehensive and standardised methodology across all stages of the Project, including construction, operation, and Decommissioning. Within this framework, visual impacts are not assessed solely on the basis of screening by trees, but through a combination of factors such as Wind Turbine siting, landscape character, distance from sensitive receptors, and embedded mitigation measures designed into the layout from the outset. These embedded mitigation measures form a core part of the assessment approach, indicating that the visual outcome is primarily driven by Project design rather than reliance on existing vegetation (as described throughout EIAR Chapter 12 Landscape and Visuals).

In relation to the OPW's concern that impacts are understated due to potential tree loss, the EIAR methodology follows established planning practice by assessing the Project against the existing baseline environment. This approach is consistent with environmental assessment guidance, where evaluations are based on current, observable conditions rather than speculative or hypothetical future scenarios.

While it is acknowledged that the Applicant does not control all lands containing trees or forestry, this reflects typical conditions in Ireland's rural landscape and does not invalidate the

assessment. The EIAR makes clear that mitigation is not dependent on third-party vegetation alone, but is achieved through the overall Project design, including turbine layout and environmental constraints. In this context, vegetation is only one of several factors contributing to the visual environment rather than the sole determinant of impact.

In terms of cultural heritage and potential impacts on OUV, the Project is supported by dedicated assessments within the EIAR, including specific chapters on Cultural Heritage (Chapter 15) and Landscape and Visual Impact (Chapter 12). These assessments apply structured and widely accepted methodologies that evaluate sensitivity, magnitude of change, and significance of effects. The design of the Project has also evolved iteratively, taking environmental and heritage constraints into account, where potential impacts have already influenced key decisions such as Wind Turbine numbers and placement.

It should be noted that the HIA (Appendix 15.1) specifically assesses the impact of the proposed Wind Turbines in a scenario whereby trees which, under current conditions, screen views of the proposed Wind Turbines (paragraphs 8.1.3, 8.1.8, 8.1.10, 8.1.12, 8.1.13, 8.1.20, 8.1.23, 8.2.6, 9.1.6). The assessment of impact has therefore demonstrably been carried out on the basis of this as a possible scenario. In the assessment of each viewpoint, the HIA also specifically relies on the view shown by the bare earth wirelines which form part of the supporting visualisations (Volume V — Heritage Photomontages) in order to assess a 'worst case scenario'. The conclusions reached in the HIA place no reliance on screening from trees.

Overall, the EIAR supports the position that forestry and trees are acknowledged as variable elements within the landscape and are not the sole basis for assessing visual impact. The Applicant's approach relies on a comprehensive, design-led assessment process consistent with EIAR standards. As such, the suggestion that the HIA (Appendix 15.1 of the EIAR) significantly understates visual or cultural heritage impacts due to reliance on trees is not supported by the structure and content of the Applicant's assessment, which considers vegetation as only one component within a broader and robust evaluation frameworks and, in any case, based its conclusions on a scenario whereby existing forestry would be felled and on the 'bare earth' conditions shown on the wirelines submitted in Volume V -- Heritage Photomontages.

3.4.3 Request for Arboricultural and Hedgerow Assessment

The OPW stated that the Commission should request a detailed survey of forestry, trees and hedgerows and revised visualisations based on potential tree loss.

In response to the OPW's request that the Commission undertake a detailed survey of forestry, trees and hedgerows, and prepare revised visualisations based on potential tree loss, it is important to emphasise that the HIA does not rely on existing trees or vegetation as mitigation. As set out above, the conclusions of the HIA are informed by an assessment of the proposed Wind Turbines under a 'bare earth' scenario, explicitly accounting for the potential removal of existing tree cover. This approach is consistently applied across the assessment, drawing on the bare earth wirelines presented in the supporting visualisations.

Accordingly, the potential future loss or management of third-party vegetation has no bearing on the conclusions reached. The assessment has already assumed a scenario in which such screening is absent, representing a robust 'worst case' position. On this basis, additional arboricultural and hedgerow assessment or revised visualisations predicated on tree loss would not alter the findings of the HIA, as these findings do not depend on the retention of existing trees or vegetation.

3.4.4 Relationship Between HIA and LVIA

The OPW states there is uncertainty regarding how the LVIA and HIA interact. The OPW states that the LVIA only designates the Rathcroghan mound as 'Very High' sensitivity. The OPW notes that most/all of the monuments assessed for cultural heritage impact in the submission are on the walking trail. As such, all are deemed to be part of a landscape of potential international significance. The OPW seeks clarification in relation to the LVIA status with regard to Rathcroghan in the context of the HIA.

It is important to clarify that Landscape and Visual and Cultural Heritage are distinct and separate disciplines, each with its own established methodology, purpose, and assessment criteria.

The LVIA addresses effects on landscape character and visual amenity, including changes to views and the perception of the landscape. By contrast, the HIA is concerned specifically with potential effects on the potential OUV of Rathcroghan, as one of the Royal Sites of Ireland, assessed in accordance with relevant heritage and UNESCO guidance. The HIA focuses on attributes of potential OUV, their integrity and authenticity, and their ability to convey potential OUV.

While both assessments may draw on some of the same visual material for illustrative purposes, their analytical frameworks, receptors, and conclusions are entirely separate. The LVIA does not inform the findings of the HIA, nor does the HIA rely on LVIA conclusions. There is therefore

no requirement for these assessments to 'overlap', as they are addressing fundamentally different questions.

Any suggestion that the validity of the HIA conclusions depends on, or should be reconciled with, the LVIA reflects a misunderstanding of the distinct roles of these assessments within the EIA process.

3.4.5 UNESCO Guidance and Methodology

3.4.5.1 Experts with specific Rathcroghan expertise.

OPW notes that Headland Archaeology, notwithstanding their expertise '*about World Heritage in general*' do not have specific knowledge of Rathcroghan. Notwithstanding the site visit with the WHU, the OPW is not aware of Headland Archaeology integrating experts in the Rathcroghan landscape in their team.

Headland Archaeology has relevant and demonstrable expertise in relation to Rathcroghan. The company was directly involved in feasibility assessment in relation to the Rathcroghan complex as part of the N5 Tusk to Rathcroghan Active Travel Scheme in 2023. This work was informed by both a site visit and a programme of recent geophysical surveys, and it provided a detailed and comprehensive appraisal of the monuments within the Rathcroghan complex as well as their wider landscape setting.

As a result, Headland Archaeology had an established and detailed understanding of Rathcroghan prior to undertaking the HIA. This baseline knowledge was further supplemented by targeted research undertaken specifically for the HIA, as set out in paragraphs 4.1.10–4.1.37.

On this basis, Headland Archaeology possesses substantial relevant experience and a robust evidential understanding of the Rathcroghan complex, including its attributes and potential OUV. The conclusions of the HIA are grounded in this experience and understanding.

3.4.5.2 Mitigation measures

The OPW list UNESCO guidelines in relation to mitigation measures:

'In the event of the identification of any unavoidable minor residual negative impacts on a World Heritage property's Outstanding Universal Value, the ESIA/HIA should outline how these will be mitigated and monitored through a budgeted environmental management plan, indicating how the mitigation measures will be implemented, who will implement them, in what time frame and with what resources.'

The OPW notes the Application has not proposed its mitigation and monitoring through a budgeted environmental management plan. The OPW assessment concludes that any impacts on the setting of Rathcroghan arise from the presence and visibility of the proposed Wind Turbines as operational structures.

Such impacts from the presence and visibility of Wind Turbines are inherent to the development and, by their nature, cannot be meaningfully reduced or managed through post-consent measures such as an environmental management plan. Design-led embedded mitigation, including site selection, layout refinement, and Wind Turbine positioning, represents the only effective means of avoiding or minimising impacts of this kind, and this has already been fully incorporated into the Project and taken into account in the assessment. Consequently, there are no additional practicable mitigation or monitoring measures that could be secured through a management plan which would alter or reduce the identified operational impacts. The absence of a specific mitigation and monitoring strategy for these effects therefore reflects the reality that all reasonable and proportionate mitigation has already been achieved at the design and assessment stage.

3.4.5.3 The application of the Precautionary Principle

OPW state UNESCO guidelines which advise that *'in cases where the data or technologies available are insufficient to predict potential impacts on the OUV, the Precautionary Principle should be applied: alternatives or appropriate mitigation measures should be identified that ensure that the OUV of a World Heritage property is never put at risk.'*

The OPW note *'The restriction of heritage impact assessment to physically prominent named National Monuments in the RMP zone may be considered a minimal rather than a precautionary approach. A Precautionary Principle would assess other points in the landscape, including the lands at the northern slopes of the plateau. The Precautionary Principle would also provide an evidential base for the longevity and effectiveness of trees for screening and the resultant assessment of impact on cultural heritage'*

In response to the OPW's comments regarding the application of the Precautionary Principle, it is not accepted that the approach adopted in the HIA is in any way minimal. The assessment has deliberately focused on the physically prominent monuments within the Rathcroghan complex as these are the locations most sensitive to changes in their setting and most clearly express the attributes which underpin Rathcroghan's potential OUV. They are also representative of the wider experiential and functional characteristics of the complex. Assessing

these key receptors therefore provides a robust and proportionate evidential basis for understanding potential impacts on OUV.

The suggestion that additional viewpoints, including less prominent monuments or monuments at the north of the complex, would materially alter the conclusions is not substantiated. The HIA has already adopted a deliberately conservative approach through the use of 'bare earth' visualisations, ensuring that potential effects are assessed on a worst-case basis without reliance on vegetation screening. In this context, the Precautionary Principle has been appropriately and demonstrably applied. The inclusion of additional viewpoints to the north of the complex suggested by the OPW would not meaningfully increase the robustness of the assessment, nor would they change its findings, but would instead represent unnecessary duplication rather than a proportionate or necessary extension of the analysis.

It is noted that paragraph 3.4.5 of the OPW response requests that the location of Rathcroghan Mound be indicated on wireline CHVP6A, which illustrates outward views from Rathnadarve. However, as is evident from the corresponding photomontage, Rathcroghan Mound does not fall within the field of view from this viewpoint. Its absence from the wireline therefore reflects the fact that it is not visible within this field of view looking towards the proposed Wind Turbines from Rathnadarve.

3.4.6 Caran Fort Photomontage Omission

The OPW notes no baseline photo, or photomontage was provided for CHVP10 (northward view from Caran Fort), only a wireframe model. The OPW states the Application does not assess the view and calls into question the reliability of the visual and cultural heritage impact assessment. The OPW also question why Caran Barrow was not included in the viewpoint selection.

Caran barrow lies on private land, and access was not possible at the time when the photography was taken for the photomontages. Photos were therefore taken from the nearest publicly accessible point, and these were used to produce CHVP9A which considers the potential impact on views towards Caran Fort and barrow.

Notwithstanding this access constraint, the assessment is not reliant solely on this viewpoint. A 'bare earth' wireline (CHVP10) was generated to represent the view from the barrow itself, and this formed a key part of the impact assessment. In addition, the barrow was visited during fieldwork, at which time 360-degree photography was captured by the landscape and visual

author. This material was used in conjunction with the wireline to inform a comprehensive assessment of impact on both the fort and the barrow.

Given the immediate proximity of Caran Fort and the barrow, and their very similar topographic positions and relationship to the Rathcroghan complex and the wider landscape, they have appropriately been considered together within the HIA. This is a proportionate and methodologically sound approach.

The combination of the visualisations provided with the HIA, site observation, and 360-degree photographs taken provides a robust and sufficient evidential basis for the assessment. The assertion that the absence of a photomontage from the precise location of the barrow undermines the reliability of the HIA is therefore not justified.

3.4.7 Omission of views from the northern section of Rathcroghan Plateau

The OPW states that the Rathcroghan Plateau extends further beyond the chosen viewpoint locations, to the north. The OPW notes there may be other monuments identified in defining the OUV, attributes and the World Heritage Property (WHP) boundary for this component site. The OPW states the HIA has not provided a rationale for the selection or omission of views.

The suggestion that the HIA does not provide a clear rationale for viewpoint selection is not accepted. Paragraphs 2.2.18 and 2.3.1–2.3.6 of the HIA set out the rationale behind the selection of viewpoints. These were deliberately chosen as those most relevant to the experience and appreciation of the Rathcroghan complex, and as those which most clearly express the attributes underpinning its potential OUV. They are also representative of the wider experiential, spatial, and functional characteristics of the complex.

The assessment of these key monuments is therefore appropriate and proportionate for understanding potential impacts on OUV. The purpose of viewpoint selection in an HIA is not to achieve exhaustive spatial coverage, but to focus on locations which meaningfully contribute to the articulation of OUV.

While it is acknowledged that additional monuments exist to the north of the complex, the inclusion of viewpoints from these would not alter the findings of the assessment. The selected viewpoints already capture the relevant characteristics of the Rathcroghan plateau and its relationship with the wider landscape.

It is also noted that the viewpoints were visited on site with the National Monuments Service during the site visit, at which time no concerns were raised regarding their suitability or representativeness. Accordingly, the approach to viewpoint selection is considered appropriate, proportionate, with the rationale clearly explained in the HIA methodology.

3.4.8 Impact Rating

The OPW states they do not agree with HIAs description of the Degree of Change as 'Negligible', the Quality of Change as 'Negative' and the Evaluation of Impact as 'Minor negative impact'. The OPW are of the opinion that 'Some' change better reflects the likely impact at Rathcroghan rather than 'Negligible' change based on the ICOMOS definitions.

The OPW's disagreement with the classification of impacts appears to arise from a conflation of visibility with impact, and from a misunderstanding of the methodology applied in the HIA.

The evaluation of impact within the HIA is not based on the simple presence or extent of visibility, but on the extent to which change affects those attributes which convey the potential OUV of Rathcroghan. It is important to emphasise that visibility alone does not equate to impact. Paragraph 2.2.25 of the HIA makes clear that 'degree of change' is synonymous with 'magnitude of impact'. Table 1 of the HIA, which reproduces Table 15.2 of the 2011 ICOMOS Guidance, explicitly defines magnitude of impact in terms of impacts on OUV. The ICOMOS framework is therefore explicit that change to an attribute is only material where it demonstrably affects OUV.

In this case, although Wind Turbines may be visible in certain views from the Rathcroghan complex, they do not interrupt, obscure, or materially diminish the attributes that convey potential OUV, nor do they materially alter the integrity or legibility of the complex.

While the proposed Wind Turbines may introduce a perceptible change in certain outward views, the assessment has concluded that this change does not materially affect the key attributes through which Rathcroghan's OUV is understood. As such, the degree of change is appropriately characterised as negligible in terms of its impact on those attributes, notwithstanding that the quality of change is adverse.

The OPW's preference for a classification of 'some' change appears to be based primarily on the extent of visibility rather than impact on potential OUV. The HIA's conclusion of a negligible degree of change, resulting in a minor adverse impact, is therefore appropriate, proportionate, and consistent with accepted UNESCO methodology.

3.5 **Irish Aviation Authority**

An observation was made by Irish Aviation Authority (IAA) regarding the consultation with Ireland West Airport and AirNav Ireland and proposed conditions to protect aviation and navigation systems.

The IAA highlighted the need for consultation with Ireland West Airport and AirNav Ireland to ensure the proposed Project and associated cranes do not interfere with flight procedures or aviation communication, navigation, and surveillance systems.

As outlined in Table 1.6 and Appendix 1.3 Scoping Responses of the EIAR, engagement was sought from the Ireland West Airport and AirNav Ireland during the pre-application stage, and EIA Scoping process. No comments were made at time from Ireland West Airport and AirNav Ireland.

The proposed conditions by IAA are as follows:

- Agree on appropriate aviation warning lighting for the wind farm with IAA.
- Provide precise turbine location data (coordinates and heights) to IAA.
- Give at least 30 days' notice before setting up cranes, in line with aviation safety regulations to IAA.

The Applicant is committed to adhering to the IAA conditions, should the application receive a grant of permission.

3.6 **Transport Infrastructure Ireland**

An observation was made by Transport Infrastructure Ireland (TII) on careful management of construction traffic, strict control of temporary road access, robust handling of heavy loads, and major caution around underground grid connections affecting national roads, and proposed conditions to protect national road infrastructure and road safety.

The proposed conditions by TII are as follows:

Abnormal Load / Exceptional Load Management Plan

- Prior to the first delivery of any abnormal or exceptional load, the developer must submit and agree an Abnormal Load and Exceptional Abnormal Load Management Plan with the Roads Authority. The plan must include:
 - Final haul route
 - Pre- and post-delivery road condition surveys (including bridges/culverts if required)

- Required accommodation works
- Traffic management measures
- Confirmation of statutory permits
- Garda escort arrangements
- The permitting process for Exceptional Abnormal Loads (>180 tonnes) must be completed in line with Department of Transport Circular RW18 (2024).
- Abnormal/exceptional load deliveries may occur outside standard construction hours if required and agreed with Roads Authorities under permit conditions.

Grid Connection – National Road Crossing Method

- Any crossings of the N61 national road must be carried out using Horizontal Directional Drilling (HDD) only.
- All construction standards for grid connection infrastructure in public roads must be agreed with the Road Authority in advance of works.

The Applicant is committed to adhering to the TII conditions, should the application receive a grant of permission.

3.7 Uisce Éireann

An observation was made by Uisce Éireann (UÉ) (formerly Irish Water) regarding the drinking water abstraction catchment for the North Roscommon Regional Water Supply Scheme and proposed conditions to protect water quality.

The UÉ response highlights that the proposed Project is located within the drinking water abstraction catchment for the North Roscommon Regional Water Supply Scheme, approximately 9.5 km upstream of Lough Gara, which is a sensitive receptor. An existing 180mm HDPE watermain is also present at the site entrance, and any potential impacts must be managed through engagement with UÉ.

UÉ requests a series of conditions to protect water quality. The proposed conditions by UÉ are as follows:

- **Drinking Water Protection Plan** - A detailed Surface Water Abstraction Protection Plan for Lough Gara must be prepared by a qualified hydrologist before construction. This must identify pathways, risks, and mitigation to ensure no deterioration in water quality.
- **Water Quality Monitoring** - A monitoring and trigger-action plan is required, including monitoring locations, parameters (e.g. turbidity, pH), real-time monitoring, threshold limits, response actions, and reporting procedures.

- **Revised Surface Water Management Plan (SWMP)** - An updated SWMP must be agreed with the Planning Authority to ensure adequate drainage design, sediment control, and water protection.
- **Incident Notification** - UÉ must be included in notification procedures for any environmental incidents.
- **Restrictions During Heavy Rainfall** - High-risk construction activities (e.g. excavation, peat disturbance, concrete works) must be prohibited during heavy rainfall events, including Met Éireann yellow warnings or above.
- **Forestry Compliance** - All forest felling must follow Forestry and Water Quality Guidelines to prevent downstream impacts.
- **No Water Quality Deterioration** - The Applicant must ensure no negative impact on surface or groundwater quality during all phases (construction, operation, decommissioning).
- **Compliance with EIAR & CEMP** - All mitigation measures outlined in the EIAR and CEMP must be fully implemented.
- **Protection of Infrastructure** - No development is permitted over UÉ infrastructure and required separation distances must be maintained.

The Applicant is committed to adhering to the UÉ conditions, should the application receive a grant of permission.

4 **RESPONSE TO LOCAL AUTHORITY OBSERVATIONS**

There was one no. submission received in response to the Application from Local Authorities, being from RCC.

4.1 **Roscommon County Council**

RCC raised some observations which can be grouped into the following points:

- **Local Planning Policy**
 - **Site Selection and 'Less Favoured' Designation** - Insufficient justification for the proposed undertaking of the Project in an area categorised as 'Less Favoured' for wind energy development instead of in a 'Most Favoured' area and it consequently not being possible for RCC to consider that the development has been demonstrated to be in accordance with the Renewable Energy Strategy (RES) and policy objective CAEE 8.5 of the Roscommon County Development Plan (RCDP) 2022-2028.
 - **Landscape Character and Proximity to Rathcroghan** - An apparent underestimation of the effect of the Project on the Rathcroghan Archaeological

Complex, in the context of landscape and visual impacts, impacts on the cultural heritage and tourism value of the Rathcroghan complex and most significantly the consequences of adverse impacts in the context of the UNESCO World Heritage bid.

- **Roads Department** - Concern is expressed in the response from the Roads Department in relation to the long term effect that the Project will have on the local road network included in the Grid Connection route. The report highlights that this will place significant constraints on RCC with respect to all future works along the proposed route. To ensure roads resilience of the Project over the entire route recommendations and proposed conditions are made.
- **Heritage Office** - expressed concern at the assertions of the submitted HIA regarding the limited role of the wider landscape of Rathcroghan in the context of the UNESCO World Heritage bid. In addition to setting out that the precautionary principle should be applied in order that the Project would not set a negative precedent in the Rathcroghan landscape, the Heritage Officer also raises the potential of negative impacts on Cloonshanville Friary, near Frenchpark.
- **Additional Council Resolutions (agreed at Plenary Meeting held on Monday 25th May 2026)** – agreement to points noted above regarding the importance of the Rathcroghan Archaeological Complex, and additional points noting the ecological importance of the River Breedoge and boglands taken out of use as a result of the Project.

4.1.1 Local Planning Policy

RCC state that while the Project highlights its strategic contribution to national climate targets, it does not adequately demonstrate compliance with local planning policies. In particular, concerns arise because the site is located in a 'Less Favoured' area for wind energy, despite policy (CAEE 8.5) prioritising development in 'Most Favoured' areas. The Application lacks clear justification for selecting this location or evidence that alternative 'Most Favoured' sites were fully considered. This issue was previously raised during pre-planning consultation but remains insufficiently addressed. Additionally, although the site lies within a 'Moderate' value landscape (LCA 20), the Application does not sufficiently assess impacts on the nearby LCA 28 (Tulsk and Rathcroghan Plateau), which is classified as of 'Exceptional Value' and has significant cultural and potential UNESCO World Heritage importance. The submitted assessment understates potential landscape and visual impacts, describing them as 'Moderate-Slight', which is not considered to reflect the sensitivity of this highly significant adjacent area.

4.1.1.1 Site Selection and 'Less Favoured' Designation

The Application documentation demonstrates that site selection and alternatives were considered in accordance with EIA requirements, including environmental, technical and design constraints. Chapter 3: Alternatives Considered of the EIAR confirms that the Applicant assessed *'reasonable alternatives... and the main reasons for the option chosen, taking into account the effects of the Project'*.

Importantly, EIA guidance does not require an exhaustive assessment of all potential alternative sites, but rather a representative range of feasible options relevant to the Project's characteristics. The chosen site reflects a balance of constraints including wind resource, grid connectivity, environmental sensitivities, landowners consent and technical viability.

While the Wind Farm Site is within a 'Less Favoured' area, the RCDP does not prohibit development in such areas; rather, it allows consideration where proposals satisfy proper planning and sustainable development principles following detailed environmental assessment. The purpose of the designation is to ensure proposals are assessed on their individual merits rather than excluded in principle. The extensive baseline surveys (ecology, hydrology, ornithology, etc.) and embedded mitigation measures incorporated into the design of this Project demonstrate that this threshold is met and the Project satisfies that test.

Furthermore, the scale of investigation (over multiple years of environmental surveys and technical analysis) indicates that the Wind Farm Site has been iteratively refined to avoid and minimise impacts, supporting its selection despite the designation as 'Less Favoured' area.

The Project's alignment with national and regional climate policy is clearly established (e.g. contribution to renewable energy targets, energy security, and emissions reduction). However, this does not occur at the expense of local policy compliance.

The EIAR demonstrates that local environmental and planning considerations have been extensively assessed, including:

- Biodiversity and Natura 2000 sites (via NIS)
- Landscape and visual impacts (Chapter 12)
- Cultural heritage (Chapter 15)
- Hydrology, peat stability, and soils (Chapter 9 and Chapter 10)
- Noise, and traffic (Chapter 13 and Chapter 16)

These assessments are supported by detailed mitigation and monitoring measures embedded into the Project design. This reflects a plan-led and evidence-based approach, consistent with the requirement under policy objectives CAEE's 8.3, 8.4, 8.5, 8.7, 8.8 and 8.12 to support developments and actions that assist in achieving the national targets for energy from renewable energy, including in respect of environmental protection, preservation and conservation of the natural and built environment, proper planning, sustainable development and proposals that bring about a direct socio-economic benefit to the local community.

The EIAR confirms that alternatives were examined at design and layout level, including turbine siting, infrastructure layout, and construction methodologies.

It is important to note that:

- The EIA Directive requires consideration of reasonable alternative, not all theoretical sites.
- Site selection is informed by multiple constraints (wind yield, grid access, land availability, environmental sensitivities).

The absence of a detailed comparative list of "Most Favoured" alternative sites does not imply a failure in the process; rather, it reflects that site identification occurred through constraint-led screening and iterative design, which is standard industry practice.

Overall, the Application supports the conclusion that the Project is consistent with the principles of proper planning and sustainable development, notwithstanding its location within an area deemed a 'Less Favoured' area within the RCC RES.

4.1.1.2 Landscape Character and Proximity to Rathcroghan

The EIAR, and specifically Chapter 12: LVIA and Chapter 15: Cultural Heritage, explicitly recognise the sensitivity and cultural importance of the Rathcroghan complex, including its status as a key archaeological landscape and tentative UNESCO World Heritage Site.

The LVIA concludes that landscape effects are generally 'Moderate-Slight', which reflects:

- The separation distance between the Wind Turbines and the core Rathcroghan area
- The intervening topography and screening
- The siting and layout of Wind Turbines to minimise visibility

In addition, Wind Turbines are located primarily within LCA 20 (Moderate Value), an area identified in the LCA as having greater capacity to accommodate change.

The assessment therefore reflects a balanced professional judgement, taking into account both the sensitivity of LCA 28 (Tulsk and Rathcroghan Plateau) and the actual magnitude of predicted effects. The design evolution process has sought to minimise visibility and avoid direct impacts on the most sensitive landscape receptors.

Chapter 15 states that;

'The predicted impact of the Wind Farm Site on the potential OUV of the Rathcroghan archaeological complex (AH1), a site which forms one of the tentative Royal Sites of Ireland WHP, has been carried out by Headland Archaeology and is included as Appendix 15.1. The assessment has concluded that the Wind Farm Site would result in a negligible degree of change upon two attributes of the WHP ('Hill top location with excellent visibility in and out' and 'Other archaeology') resulting in a minor negative impact on potential OUV. All other attributes of the Rathcroghan that convey potential OUV would remain unaffected.

Applying the methodologies outlined in Section 15.2, indirect negative effects on the individual AH sites of the Rathcroghan archaeological complex (AH1.1 – .108) range from not significant to slight. Several sites are not subject to any effects due to the fact that the ZTV mapping indicates that the proposed turbines will not be visible from certain portions of the Study Area.'

Overall Chapter 15 concludes that;

'In summary, following the application of mitigation measures there will be no significant residual effects on the previously unrecorded archaeological, architectural or cultural heritage resource as a result of the Project. This is due to the fact that any remains that are encountered during the course of monitoring or test trenching will be subject to preservation by record or preservation in-situ.

Residual effects will remain with regards to the setting of archaeological, architectural and cultural heritage sites, due to the fact that the effects on the setting of the sites cannot be mitigated. These effects will not be significant or permanent, and will be removed following the decommissioning of the turbines.'

4.1.2 Roads Department

RCC Roads Department has raised concerns about the long-term impacts of the Project on the local road network, particularly along the Grid Connection route. They highlight that the Project could limit future road improvement and maintenance works. The RCC Roads Department is imposing strict conditions to protect road infrastructure, ensure safety and minimal disruption, and prevent long-term negative impacts on the road network.

The proposed recommendations and conditions by RCC Roads Department are as follows:

General Conditions

- Submission of a Construction Management Plan is required.
- RCC must be informed about contractors and safety roles (PSDP/PSCS).
- Developer must provide:
 - Insurance and performance bond
 - Traffic management plans
 - Public and stakeholder engagement
- Coordination required with Gardaí, emergency services, and transport providers.

Road & Construction Requirements

- Pre-construction surveys (video, photos, structural checks) are mandatory.
- Works must follow TII standards and the “Purple Book” trench reinstatement guidelines.
- Roads must be fully restored, including markings, drainage, and structures.
 - A 2-year defects liability period applies after completion.

Traffic & Road Use

- Road closures restricted, especially on regional roads (traffic must be maintained).
- Advance notice (typically 8 weeks) required for closures or changes.
- Diversions and safety measures must be properly managed.

Turbine & Materials Delivery

- Detailed delivery plans must include; routes, timing, loads, and traffic arrangements
- Roads or junctions must be upgraded if unsuitable.
- Any damage must be fully repaired by the developer.
- Abnormal load permits required for turbine transport.
- Full reinstatement and landscaping restoration required after works.

The Applicant is committed to adhering to the RCC conditions, should the application receive a grant of permission.

4.1.3 Heritage Office

The Heritage Officer raises concerns regarding the potential impact of the proposed Project on two key heritage assets. In relation to the Rathcroghan Tentative World Heritage Site, it is noted that because the site's OUV is not yet fully defined, it is not possible to support the Heritage Impact Assessment's claim that the wider landscape plays only a limited role. As a result, a precautionary approach is recommended to avoid setting a negative precedent for development that could significantly affect important views from the elevated monuments and their wider

setting. The Heritage Officer also advises that an independent review by accredited UNESCO specialists should be undertaken to more accurately assess impacts, which may be greater than currently stated.

Concerns are also expressed about potential impacts on Cloonshanville Friary, a site of significant historical, cultural, and community importance. Reference is made to its Conservation Management Plan, which highlights its importance not only as a historic structure but also in its wider religious and community context. Ongoing conservation works aim to improve access and presentation; however, the proposed development is considered likely to have a potentially high visual impact. This could intrude on key views from the friary, introduce visual disharmony, and reduce the overall visual amenity, thereby negatively affecting the site's significance

4.1.3.1 Rathcroghan Tentative World Heritage Site, as part of the Royal Sites of Ireland UNESCO World Heritage bid.

The Applicant maintains that the proposed Project has been subject to a detailed HIA (Appendix 15.1 of the EIAR) which specifically considered the Rathcroghan Complex in the context of its status as a Tentative UNESCO World Heritage Site. The assessment, undertaken in accordance with established methodologies and guidance (including ICOMOS guidance and UNESCO principles), concludes that the contribution of the wider landscape to the site's potential OUV is limited, and that the proposed Wind Turbines would not result in significant adverse effects on the key attributes that underpin that value. The Wind Farm Site is located at a remove from the core archaeological monuments, and the assessment is informed by field surveys, mapping, and visualisations to evaluate intervisibility and setting. On this basis, and as presented in the HIA, the Applicant considers that predicted impacts are negligible to minor, rather than of a higher magnitude.

Furthermore, it is asserted that the Project has been designed to avoid direct physical impacts on recorded monuments and sensitive archaeological features, with impacts assessed primarily in visual rather than physical terms. The Applicant contends that the methodology applied is consistent with best practice and that the conclusions reached in the HIA are evidence-based. It is acknowledged that research into Rathcroghan's potential OUV is ongoing. However, the HIA necessarily assesses potential effects based on the current, evidenced understanding of OUV and its attributes. This approach is appropriate and consistent with established practice and has been clearly articulated within the HIA.

While acknowledging the evolving nature of the UNESCO bid, the Applicant's position is that the Project would not prejudice the potential designation, particularly given the absence of direct effects and the limited extent of visual influence on the most sensitive receptors.

In response to the suggestion that a precautionary approach or independent UNESCO review is required, the Applicant would likely point to the robustness of the existing assessment framework and the fact that the planning process itself, including the Commission's evaluation, provides an independent and objective review of environmental and cultural heritage impacts. The Applicant may also emphasise that renewable energy developments such as this Project are strategically important developments that contribute to national climate targets and energy security, and that these considerations must be balanced alongside heritage protection.

It should also be noted that, as set out in paragraph 3.4.5.3 above, the HIA has clearly applied the Precautionary Principle through the use of 'bare earth' wirelines, explicitly accounting for the potential removal of existing tree cover. This ensures that impacts are assessed on a robust worst-case basis.

4.1.3.2 Cloonshanville Friary

In relation to the Cloonshanville Friary, the Applicant's position is that the Project does not result in any direct impact on the structure or its fabric, and that any potential effects relate to the wider landscape setting, as detailed in the Chapter 15: Archaeology. The Chapter considers sensitive receptors, including heritage sites, and concludes that the level of change would not significantly undermine the cultural or historical value of such locations. While some degree of change is acknowledged, it is assessed as being within acceptable limits and not resulting in substantial harm to the appreciation or significance of the friary.

The Applicant would also highlight that the Project has been developed with community engagement and local benefit in mind, including the provision of a community benefit fund and potential economic investment in the area. In this context, it is argued that the Project represents a balanced approach, delivering renewable energy infrastructure while managing environmental and heritage effects through careful siting, design, and mitigation.

Overall, the Applicant's response is that the concerns raised are acknowledged but are not supported by the findings of the detailed assessments carried out, which conclude that the Project will have no significant adverse impact on the Rathcroghan landscape or Cloonshanville Friary, and that it remains consistent with planning policy supporting renewable energy, subject to appropriate environmental safeguards.

4.1.4 Additional Council Resolutions

At a Plenary Meeting held on Monday 25th May 2026 the following resolutions were noted and are attached as addendum to the Chief Executive's Report:

- Rathcroghan is an area of national importance
- Ecological importance of the River Breedoge
- Boglands taken out of use are now being considered for wind turbine development

4.1.4.1 Rathcroghan is an area of national importance

'It was AGREED to highlight that Rathcroghan is an area of national importance from a heritage and tourism development point of view. This proposed development could be injurious to the site and the promoted objectives in relation to the development of Rathcroghan from a tourism point of view and also the protection of our heritage. It should also be noted that the area is 'Less Favoured as outlined in the County Development Plan's Renewable Energy Strategy.'

As detailed within this response and in the HIA (Appendix 15.1 of the EIAR), Section 9.8 (Rathcroghan Archaeological Complex) of the RCDP contains the following text relevant to Rathcroghan:

'The landscape of the Rathcroghan area reflects 5,000 years of human activity from Neolithic to Medieval periods. The archaeological characteristics of this landscape have survived largely intact to this day because of the respect and appreciation of the site amongst the local landowners. Conservation of this landscape and of the monuments and their settings, which contribute to this historic landscape, must be balanced with the sustaining of viable land use practices and a viable population in the area.'

In the context of this part of the RCDP, it is considered that whilst the proposed Wind Turbines would result in visual change within the wider landscape of Rathcroghan, the key elements of its landscape setting that support potential OUV would be preserved. It is therefore considered that the Project would not be contrary to RCDP.

4.1.4.2 Ecological importance of the River Breedoge

'It was AGREED to highlight the ecological importance of the Breedogue River as a significant habitat for freshwater fish, and to highlight that any interference could have a detrimental impact on fish and wildlife.'

The Wind Farm Site is located within the Upper Shannon hydrological catchment, intersecting several small sub-basins that drain towards the River Breedoge.

As stated in EIAR Chapter 9 Aquatic Ecology the potential sources of environmental impact associated with the construction, operational, and Decommissioning phases of the Project have been identified (Section 9.4 of Chapter 9). In the absence of appropriate mitigation, these sources could result in short-term adverse effects on aquatic ecology at the local scale, including possible disturbance to sensitive flora and fauna within watercourses surveyed. There is also a theoretical risk of modification to natural watercourses from proposed crossings and bridge installations; however, the complete loss or fragmentation of natural watercourses is considered highly unlikely due to the use of clear-span bridge designs and avoidance of in-stream works.

Importantly, the Project has been designed and will be implemented in accordance with Article 5 of the EC Environmental Objectives (Surface Waters) Regulations 2009, which prohibits any development that would result in a deterioration in the status of a surface water body. The mitigation measures proposed have been specifically developed to ensure that there is no deterioration in the ecological or chemical status of any surface water or groundwater body. Therefore, with these measures fully in place and implemented, no significant effects on aquatic ecology are predicted to occur as a result of the Project.

Furthermore, any potential cumulative or in-combination effects on downstream Natura 2000 sites within the zone of influence (Zol) have been assessed in the accompanying NIS. With the proposed mitigation in place, no adverse effects on the integrity of any European site are anticipated, either alone or in combination with other plans or projects.

4.1.4.3 Boglands taken out of use, are now being considered for wind turbine development

'It was AGREED to highlight concerns that former boglands, previously taken out of use, are now being considered for wind turbine development requiring significant works. These bogs were originally withdrawn from use as turf cutting was no longer permitted, and that this context should be taken into account'

The principal significant impact on habitats as a result of the proposed Project is the loss of small areas of wet willow-alder-ash woodland, hedgerow, scrub, wet grassland and cutover raised bog.

As stated in Chapter 6: Biodiversity the proposed Wind Turbines T1 and T3 are located within cutover raised bog habitat. The proposed Wind Turbines T8 and T9 are also situated in an area

of historic raised bog that has been entirely cutover and degraded with the land cover now supporting a wet grassland vegetation community.

Given the existing cutover nature of raised bog at the proposed Wind Turbines T1 and T3 and the entirely degraded nature of the peatland substrate at T8 and T9 where drainage of the adjacent bog substrate has already occurred will eliminate the potential for further drawdown. It is noted that the only area where uncut raised bog occurs in the vicinity of the Project infrastructure is to the west of the proposed Wind Turbine T3. The Project infrastructure at T3 is buffered from the area of uncut bog by approximately 30m. The remaining area of bog to the west of this location has been drained and given the historic cutaway and drainage of the bog in the surrounding area it is considered that the potential for the proposed infrastructure associated with T3 to result in further drawdown and deterioration of remnant uncut bog will be eliminated.

This loss will be mitigated by the planting of 1km of new hedging and c. 4.5 Ha of new native broadleaved woodland habitat. Details of the planting programme, along with hedgerow enhancement measures and the planting of native woodland, are given in the BEMP (see Appendix 6.2 of the EIAR). In order to mitigate the loss of c. 2 Ha of cutover raised bog to the footprint of the Project an area of cutover and degraded raised bog habitat surrounding the Wind Turbine T1 and to the south of the Wind Turbine T9 will be subject to peatland habitat rehabilitation. Approximately 26 Ha of raised bog habitat will be subject to habitat management and enhancement measures. The enhancement and rehabilitation measures to be implemented for these areas of cutover and degraded raised bog are set out in the BEMP (Appendix 6.2). The successful delivery of the targets set out for the restoration of these areas will contribute towards an increase in the extent of raised bog habitat at favourable conservation condition within local and county context. In addition, the successful delivery of the targets set out for the cutover raised bog at BEMP Area 1 will have the potential to contribute towards the enhancement of hydrological conditions in lands buffering the Cloonshanville Bog SAC.

5 **CONCLUSION**

This response has been prepared to address the observations made by Third-Party observers and Prescribed Bodies including Local Authorities in respect of the proposed Project. The response read together with the Application, including EIAR and NIS, constitutes a full and robust response to the matters raised and the information provided here will directly assist the Commission in their ongoing consideration of the Application.

The conclusion of the Planning Statement for the Application provides a concise summary of the planning rationale, with the key considerations restated below.

Renewable energy is identified as being required to play a vital role in mitigating climate change by transitioning to a carbon-neutral economy and society. By investing in renewable energy, Ireland can promote sustainable economic development using its own secure and clean energy.

All planning applications must be determined on their individual merits, with due consideration given to the overall planning balance of a scheme. The pressing need to address climate change and the overriding public interest in renewable energy projects further supports additional renewable energy schemes, such as the Project now proposed.

Ireland is currently facing significant challenges in meeting renewable energy and emissions targets and is falling behind in the transition away from fossil fuels. According to the Environmental Protection Agency, current measures are projected to reduce greenhouse gas emissions by only 23% by 2030, well short of the national 51% target. This challenge is compounded by global energy market instability which has disrupted oil and gas supply routes, driven up energy prices across Europe, and highlighted the vulnerability of countries dependent on fossil fuel imports. These developments underscore the urgency of accelerating domestic renewable energy deployment to improve energy security, protect consumers from volatile global markets, and support climate objectives.

If permitted and constructed, the Project in County Roscommon will provide an estimated 62.7MW of renewable, domestically produced wind energy. This additional renewable power is expected to generate approximately 203.2 GWh per year, contributing significantly to Ireland's renewable electricity targets and supporting the Government's objective of achieving 80% renewable electricity by 2030.

In terms of emissions reductions, the Project is estimated to displace approximately 51,558 tonnes of CO₂ annually, amounting to around 1,804,530 tonnes over its 35-year operational lifetime, compared with equivalent generation from conventional fossil fuel power stations.

Based on average domestic electricity consumption of 4,200 kWh per household per year, the Project's output could supply approximately 48,333 homes. By comparison, the total housing stock in County Roscommon is 32,129 dwellings, meaning the Project could generate enough renewable electricity to meet roughly 150% of the county's household electricity demand.

The Project contributes to supplying the national demand for renewable energy, which, in the context of the ongoing climate emergency, rising energy demand, and global supply pressures, is an urgent Irish national priority.

While renewable energy in Ireland has come a long way, there is still a shortfall in where the nation needs to be to achieve increasing targets. Ireland missed its 2020 RES target as part of RED I, achieving 13.5% instead of the target 16%. Ireland's overall RES target has now increased to 43.0% in 2030 as part of RED III. There is a clear national mandate to accommodate significant onshore wind within the next decade with the CAP2025 setting a 9 GW target for installed wind energy capacity by 2030. In Dec 2024 this was 4.8 GW, leaving a shortfall of 4.2 GW to be achieved in the next 5 years.

Further, the National Planning Framework - First Revision emphasises a move to a low-carbon economy, reducing Ireland's carbon footprint and integrating climate action into the planning system. The RSES for the Northern and Western Region supports opportunities for onshore wind as a major source of renewable energy with an important role in delivering value and clean electricity for Ireland. The RCDP reinforces the national and regional energy policies. The Wind Farm Site falls in an area classed as '*Less Favourable*' to wind farm development in the Renewable Energy Strategy for Co. Roscommon. '*Less Favoured*' areas are defined as areas where: '*Wind farm development will be considered, but the sensitivities revealed in these areas would render exploitation more problematic and therefore these areas are less favoured for wind energy development.*'

The development process adopted by the Applicant has represented a best practice approach to a renewable energy scheme design, minimising the potential effects on the receiving environment through multiple design iterations and modifications, and ensuring compliance with the suite of planning policies and objectives of the RCDP. The layout of the Project presented

in the planning application and EIAR represents the optimum fit, considering the technical and environmental parameters of this Project as discussed within this EIAR.

Likely significant effects have been considered within the EIAR and through the process of assessment, embedded mitigation, and additional proposed mitigation outlined in the EIAR, NIS, Construction Environment Management Plan and Biodiversity Enhancement and Management Plan and it has been shown that the Project can be constructed, operated and decommissioned without likely significant effects on the environment arising. The absence of significant effects is not based on a single assessment but is consistently supported by the Biodiversity, Ornithology, Hydrology & Hydrogeology, Soils & Geology, and Aquatic Ecology assessments (in the EIAR) and the NIS.

The Application including the Planning Statement and EIAR outlines how the Project is compliant with International, European and National policy on energy security, emissions reductions and renewable energy production. It has reviewed policy for the Northern and Western region and local County Roscommon policies and finds the Project complies with key renewable energy and environmental policy objectives. The Project is aligned to all the relevant planning policies identified throughout this Planning Statement, and it will contribute to achieving renewable energy and reduction in emissions targets locally, regionally and nationally.

The Project will contribute to the diversity of sources of energy supply and the security of supply in the local area. It contributes to supplying the demand for renewable energy, which in the context of the ongoing climate emergency is an urgent Irish national priority that must be given significant weight given the wealth of supporting national and international policy, in light of the REDIII, RePowerEU Plan and the National Energy Security Framework, additional renewable energy is of overriding public interest and vital for the security of Irelands energy supply and reducing the climate impacts of fossil fuels. Due to the ongoing climate and biodiversity emergency, it is vital to generate more renewable energy in the Irish energy system in order to displace fossil fuels.

Having regard to the key points set out in this response to observations, together with the full Application documents, including but not limited to the Planning Statement, the EIAR and the NIS, it is respectfully requested that the Commission consider the relevant international, national and regional planning context that applies to the Project, and grants permission for the proposed Project which is the subject of this Application.