AGENDA ITEM NO. 11

Strategic Infrastructure Development (SID) application
under Section 37E of the Planning and Development Act 2000 (as amended)

Report on proposed 'Carrigeen Renewable Energy Development' – wind energy development and associated infrastructure, including grid connection

Description of development: **Strategic Infrastructure Development Proposal – Direct Planning Application to An Coimisiún Pleanála (Section 37E of the Planning and Development Act 2000 (as amended))**

The development is proposed to consist of the following:

- "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."

The following timeframes are being sought:

- A 10 year permission;
- An operational period of 35 years for the wind turbines, meteorological mast and site signage from the date of full commissioning of the wind turbines;
- A "permanent planning permission…. for all other works."

Location: Townlands of Leggatinty, Carrigeenacreeha, Ballynahowna, Caranlea, Killummod, Culleenatreen or Flagford, Cartroncaran, Lodge, Carrigeen, Ballaghcullia, Ballindrehid, Corbally East, Peak, Gortnacloy, Tonaknick, Ballysundrivan, Caran, Cloonkerin, Carrowntogher, Corbally Middle, Ballyroddy, Cloonshanville, Skeanavart, Dacklin, Kinclare, Erriblagh, Lisgarve, Loughbally, Rathardeagher, Carrigeenynaghtan, Brackloon, Edenan and Kinclare, Kilnamryall, Corbally West, Cartroncarrarowntogher, Carrowncaran. County Roscommon.

Applicant: Carraigin Power Ltd.

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1.0 Strategic Infrastructure Development

1.1 Determination of the proposed development constituting Strategic Infrastructure Development (SID)

The Seventh Schedule[1] of the Planning and Development Act 2000 (as amended) identifies classes of development which constitute 'Infrastructure Developments for the Purposes of Sections 37A and 37B' of the Act. Section 37A pertains to the 'Board's jurisdiction in relation to certain planning applications' and as set out in that Section, an application for permission for any development specified in the Seventh Schedule, and which meets a particular condition, shall be made to An Coimisiún Pleanála[2] and not to the Planning Authority. The condition is that if following pre-application consultation[3] by the prospective applicants (Carraigin Power Ltd. in this case) with An Coimisiún Pleanála, the Commission serves a notice setting out that in its opinion, the proposed development would fall within one of the following:

(a) "The development would be of strategic economic or social importance to the State or the region in which it would be situate"; or
(b) "The development would contribute substantially to the fulfilment of any of the objectives in the National Planning Framework or in any regional spatial and economic strategy in force in respect of the area or areas in which it would be situate;" or
(c) "The development would have a significant effect on the area of more than one planning authority."

In the case of the subject development, following the conclusion of consultations between the applicant and An Coimisiún Pleanála, the Commission, under Section 37B of the Planning and Development Act 2000 (as amended), issued a notice on 6th February 2026 confirming its determination that the proposed development constitutes strategic infrastructure within the meaning of Section 37B of the Planning and Development Act 2000 (as amended) and accordingly advising that an application for the proposed development was required to be made directly to An Coimisiún Pleanála.

The notice also included a list of prescribed bodies which the applicants were required to notify of the making of an application for the proposed development. Roscommon County Council was amongst the list of 22 prescribed bodies listed.

1.2 The role of Roscommon County Council in the Strategic Infrastructure Development planning application process

Further to the identification of Roscommon County Council as a prescribed body, and in accordance with the requirements of Section 37E (3)(b) of the Planning and Development Act 2000 (as amended), notice and copies of the planning application (which includes an Environmental Impact Assessment Report and a Natura Impact Statement) was provided to the Council on 30th March 2026, in advance of the

[1] Inserted through the Planning and Development (Strategic Infrastructure) Act 2006.
[2] Formerly referred to as An Bord Pléanala. References throughout this report refer to the new title of An Coimisiún Pleanála and / or the Commission, except where legislation containing reference to 'An Bord Pleanala' and / or 'the Board' is directly quoted.
[3] To be undertaken in the form set out in Section 37B of the Planning and Development Act 2000 (as amended).

commencement of the public consultation period on this application on 7th April 2026. The public consultation is scheduled to conclude on 25th May 2026, by which time third party submissions are required to be lodged with An Coimisiún Pleanála. As per correspondence issued from the Commission to Roscommon County Council, the final date for receipt of consultation responses from prescribed bodies is 10th June 2026 i.e. 10 weeks from the date of the formal commencement of the consultation process.

As the Planning Authority for the area in which the development is proposed, the role of Roscommon County Council is that of a consultee / prescribed body. In accordance with Section 37E (4) of the Act, the Planning Authority is required within 10 weeks from the making of the application to An Coimisiún Pleanála *"to prepare and submit to the Board a report setting out the views of the authority on the effects of the proposed development on the environment and the proper planning and sustainable development of the area of the authority."*

The Chief Executive is required, prior to the submission of the report to An Coimisiún Pleanála, to submit the report to the Council members in order to seek their views on the development proposal. In the event that Members decide, by resolution, to attach further recommendations to the report, those recommendations will be attached to the Chief Executive's Report for submission to the Commission.

The planning application documentation has been available to view throughout the public consultation process, online, on the applicant's dedicated website at Carrigeen (carrigeeninfo.com) and on An Coimisiún Pleanála's website. In addition, application documentation is also available to view in hard copy at the offices of An Coimisiún Pleanála, as well as at the Planning Department in Roscommon County Council.

1.3 The Decision of An Coimisiún Pleanála

As set out in Section 37G ('Decision by Board on application under section 37E') of the Planning and Development Act 2000 (as amended), the Commission may decide to:

- Grant permission; or
- Specify modifications to the development and grant permission for the proposed development as modified; or
- Grant permission for part of the development (with or without modified specifications); or
- Decide to refuse to grant permission.

Section 37G (6) also clarifies that the Commission may decide to grant permission *"even if the proposed development, or part thereof, contravenes materially the development plan relating to any area in which it is proposed to situate the development."*

This Section of the Act also elaborates on the Commission's application of conditions, in the event of the granting of planning permission for a Strategic Infrastructure Development. In addition to conditions relating to typical matters set out in Section 34(4) of the Act, conditions may also be attached which require the payment of contributions to the Planning Authority, the submission of further information to the Commission or the Local Authority in advance of the commencement of development, or the

construction or financing of a facility of the provision of or financing of a service which would "constitute a substantial gain to the community." Conditions may also require that points of detail relating to the grant of permission be agreed between the Planning Authority and the person carrying out the development.

2.0 Applicant and Agent Information

The applicant is identified as Carraigin Power Ltd.. Details provided in the application documentation describe Carraigin Power Ltd. as "an associated company of the Developer, Enerco Energy Ltd.." Enerco Energy Ltd. is detailed as an Irish-owned, Cork-based company with extensive experience in the design, construction and operation of wind energy developments throughout Ireland. They have been cited as being involved projects currently operating or in construction in Counties Cork, Kerry, Limerick, Clare, Galway, Mayo and Donegal.

The agents acting on behalf of the applicants in this application are Jennings O'Donovan and Partners Ltd., a long established, multi-disciplinary engineering consultancy based in Sligo. The professional credentials of the project team personnel involved in the preparation of the EIAR, Natura Impact Statement, various specialist studies etc. have been detailed in the submitted documentation. The project team includes personnel from several environmental and engineering consultancy firms. On the basis of the information presented, it is reasonable to accept that the submitted material has been prepared by appropriately qualified, competent experts.

3.0 Site Location

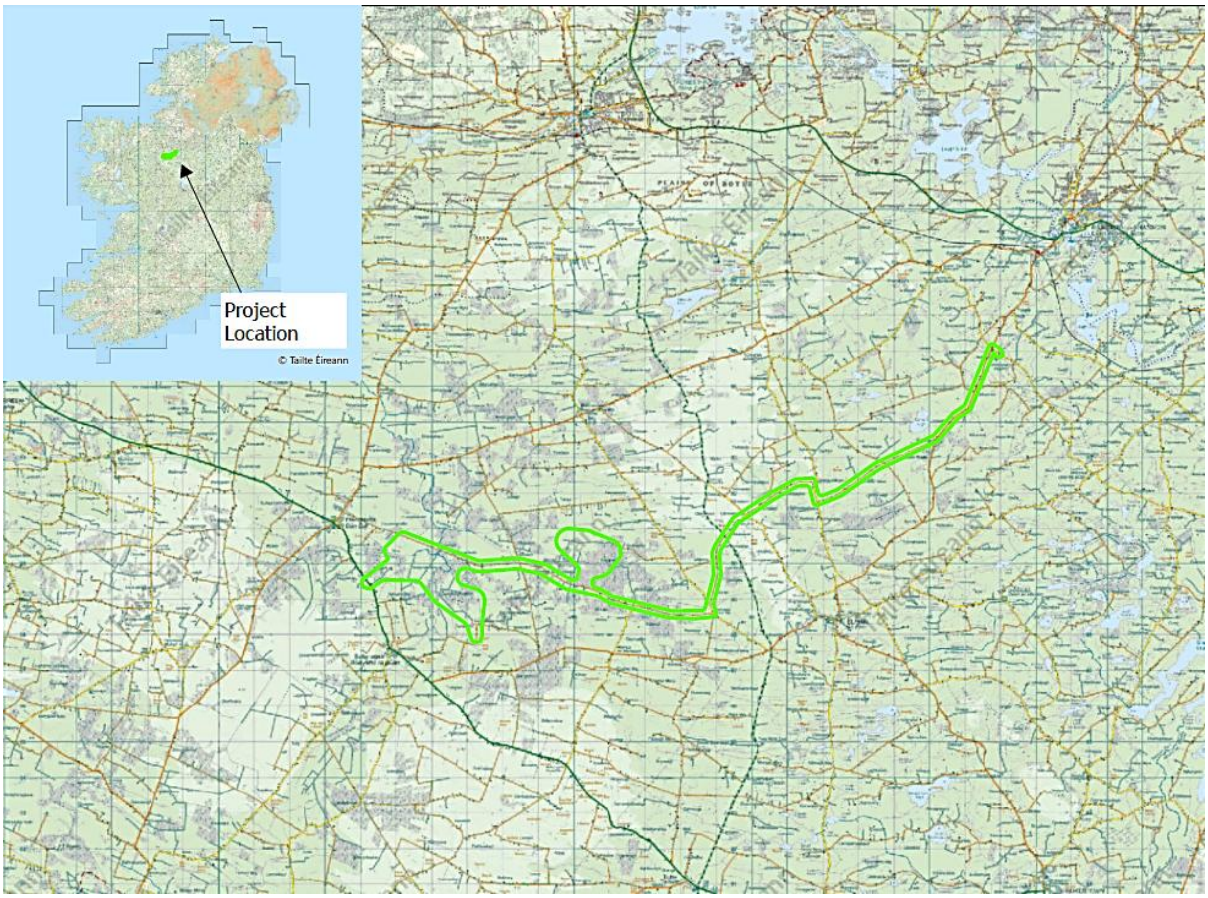

Fig. 1: Extract from site location map (Source: 'Volume III EIAR Figures')

The proposed development site is located towards the north of County Roscommon, "c. 12km north-east of Castlerea and c. 16km south-west of Carrick-on-Shannon." The proposed site comprises of the main area, in which the 11 no. turbines and an onsite substation are proposed, and also includes the proposed grid connection which would extend north-eastwards to the ESB substation at Flagford, near Carrick-on-Shannon. Submitted application documentation indicates that the site is approximately 1,040 hectares, The 11 no. wind turbines are proposed in closest proximity to the villages of Frenchpark and Ballinagare. The closest of the proposed turbines (T2) is approximately 2.1km from Frenchpark, while another turbine (T5) would be approximately 2.2km from Ballinagare.

3.1 Site Location in the context of Roscommon County Council Designations

Landscape Character Assessment

The proposed location of the 11 no. turbines is within Landscape Character Area 20 – Breedoge Bogland Basin as identified in the *Landscape Character Assessment (LCA)* which forms part of the *Roscommon County Development Plan 2022-2028.* As detailed in the LCA, this character area is classified as being of 'Moderate Value.' The principle feature of interest is the vast area of bogland in the centre of the LCA,

which has intrinsic ecological qualities and is remote. There is a designated Scenic View located on the N61 to the east providing a broadly panoramic and elevated view overlooking this LCA.

It should also be noted that the proposed turbine locations are in relatively close proximity to the Tulsk and Rathcroghan Plateau LCA, which is one of only two LCAs in the county designated as being of 'Exceptional Value.'

Section 2.2 of the *Landscape Character Assessment* concerns 'Opportunities presented by the unique character of the landscape of County Roscommon', with Opportunity no. 9 noting that "*Renewable energy projects are feasible in various locations within the county, with some areas being conducive to commercial scale wind energy projects due to landform and wind speeds, while other renewable technologies such as solar farms are adoptable to a wide range of landscape areas without compromising the character of such areas."*

Renewable Energy Strategy

The area of the proposed site in which the 11 no. wind turbines and the onsite substation are proposed, is identified in the *County Roscommon Renewable Energy Strategy* (which forms part of the *Roscommon County Development Plan 2022-2028)* as 'Less Favoured.' The principle in 'less Favoured' areas is that "'*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 intent of this designation, as distinct from areas identified as 'Most Favoured' or 'Not Favoured' will be discussed in a subsequent section of this report, as part of the concluding assessment.

4.0 Development Proposal

4.1 Summary of Proposed Works

The formal development description detailed on page 1 of this report sets out in detail the various components of the proposal. In summary, the main elements of the development are:

- 11 no. wind turbines;
- A 110kV onsite substation;
- A grid connection (underground electrical cable) from the onsite substation to the existing 220kV ESB substation in Flagford, over a length of approximately 17.5km;
- 6 no. temporary construction compounds;
- New site access roads;
- Upgrading of existing access roads; and
- Junction improvements off the N5 (to facilitate turbine delivery), access tracks and upgrading of existing tracks on the site.

In addition to the foregoing elements, various associated site works are also proposed, including borrow pits, peat and spoil management, tree felling and vegetation removal, site drainage, biodiversity enhancement measures and operational stage signage.

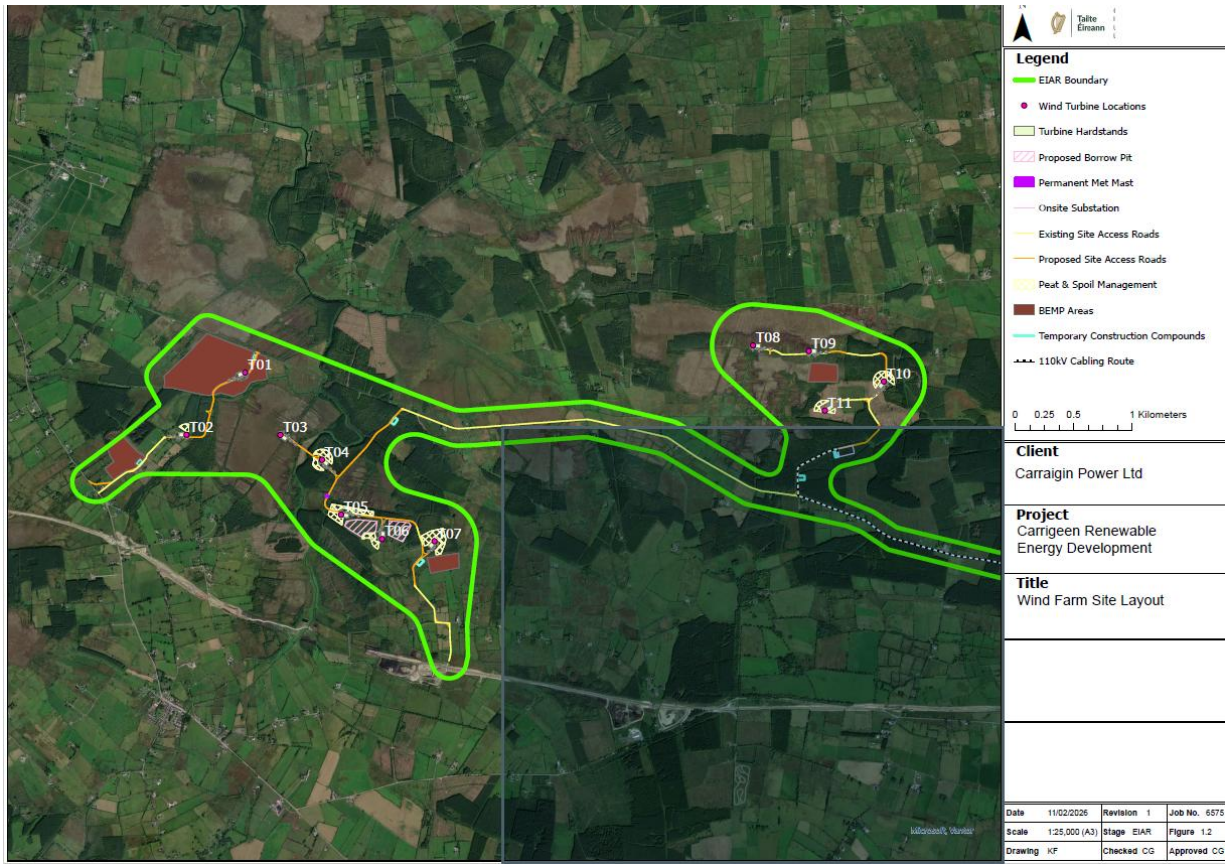

Fig.2 : Proposed site layout – turbine area (Source: Volume III EIAR Figures)

Seven of the turbines are proposed to be located on the southern side of the L1217 Local Road, effectively arranged in two clusters. Turbines T1 and T2 are proposed in the westernmost area i.e. closest proximity to Frenchpark village, while a further five turbines would be further east. The remaining four turbines (T8 to T11) are proposed in a cluster to the northeast, on the northern side of the L1217.

4.2 Proposed Period of Planning Permission

A ten year planning permission is sought. In addition, a 35 year operational period is being sought for the windfarm "from the date of commissioning of the entire project." Application documentation also clarifies that the proposed onsite substation and the grid connection from the site to Flagford would form part of the national grid, under the ownership of ESB Networks and would not be decommissioned at the end of the operational life of the wind farm.

4.3 Turbines and onsite substation

Details provided in the submitted application documentation refer to the 'candidate wind turbines' and explain that the final turbine choice "will be guided by an assessment of the wind conditions and will take account of available technologies at the time of construction."[4] The 'candidate' wind turbine type (which has been used for assessments detailed in the EIAR) is the Vestas V163 turbine model. Characteristics of this turbine model are:

- Typical 3 blade design;
- White or light grey in colour;
- Blade tip height of 185 metres;
- Rotor diameter of 163 metres;
- Hub height of 103.5 metres; and
- Maximum capacity of 5.7MW per turbine.

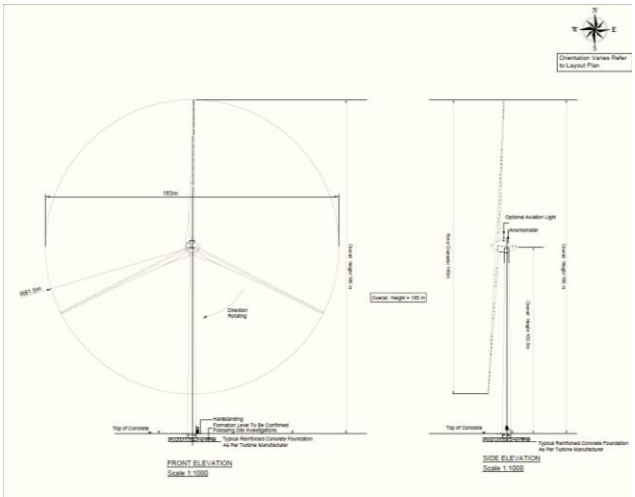

Fig. 3: 'Candidate' wind turbine

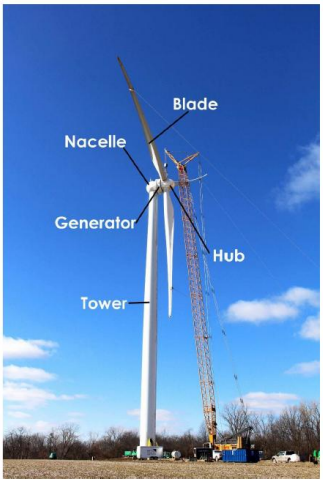

Fig. 4: Turbine example (Source: submitted EIAR, Chapter 2)

[4] The choice of final wind turbine would be selected by "a competitive tendering process as part of the project financing process, after all necessary consents have been secured."

Turbine foundations would be formed using steel reinforced concrete and each would measure c.27.2m in diameter, with a depth of c 3.5m. The dimensions set out are indicative, with the submitted documentation also stating that the final foundation design will be dependent on the turbine type and determined at the detailed design stage. Each turbine and foundation would be surrounded by an extensive area of hardstanding, of sufficient size to accommodate the delivery and assembly of turbine components, including the rotor assembly, in advance of turbine lifting and assembly. The cumulative extent of hardstanding surrounding the 11 no. turbines is estimated to be c. 5,435m^2.

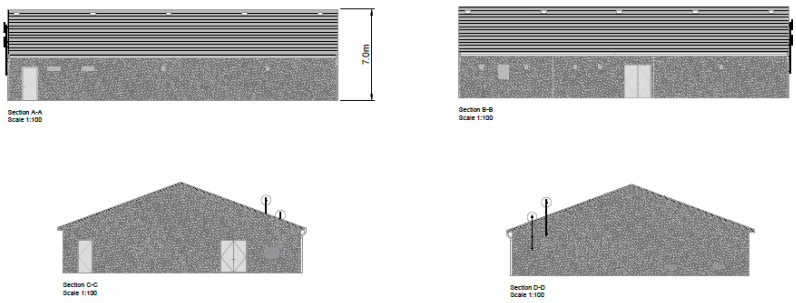

Fig 5 Control Building

The onsite substation would be located within a compound area which would extend to approximately 8,527m^2. Electricity transmitted between the wind turbines and the onsite substation would be at a voltage of 33kV. All aspects of the onsite substation would meet EirGrid specifications. The overall substation compound would be enclosed by a 2.6m high palisade fence and would also accommodate two control buildings and ancillary equipment, including transformers, switch gear, fault protection, metering and car parking.

4.4 Site Access Arrangements

A total of five entrances are proposed to serve the subject site.

- Site entrance no. 1 and 1a: on the existing N5 and L1217 respectively (proposed to facilitate the delivery of wind turbine components for proposed turbines T1 and T2);
- Site entrance no. 2: Onto the L1217 local road (creation of a new entrance);
- Site entrance no. 3: Onto the L1217 local road (upgrading of an existing forestry entrance);
- Site entrance no. 4: Onto the L56421 (new access);
- Site entrance no. 5: Onto the L1217 local road (upgrading of an existing forestry entrance).

Site entrances 1 and 1a would allow abnormal load vehicles to leave the N5 at site entrance 1 and join the L56402 at site entrance 1a to access Wind Turbines T1 and T2. In assessing traffic impacts, it is noted in the application documentation that the section of the N5 at site entrance 1 will become a regional / local road with reduced traffic volumes and reduced speed limit when the new section of N5 between Scramoge and Ballaghaderreen opens. It is notable that the Road Safety Audit for Site Entrance 1 recommends that the site access road and junction should be removed upon completion of the wind farm. The has however been rejected by the applicants' design team who have instead chosen to redesign the site access road and confirm that it will be used exclusively for abnormal load vehicles.

Proposed Site Entrance 4 (on the L56421) is a new entrance, necessary to provide access to the area in which turbine numbers 3 to 11 are proposed. This new access point is proposed off the new N5 / L5642 priority junction.

Site access roads proposed in and around the turbines have been designed to follow existing commercial forestry access tracks where possible. Approximately 6,382 metres of existing access tracks will be upgraded while approximately 5,325m of new internal access roads would be developed. New site access roads and the upgrading of existing forestry tracks will all have an average running width of 5 metres and a gravel surface.

Seven crossings of rivers and natural streams are proposed along the site access road network – six of the crossings are within the internal access road network, while the seventh crossing is along the L1217 local road. All major watercourse crossings are clear span bridges and minor watercourse crossings will be culverts.

4.5 Grid Connection

The proposed grid connection would extend approximately 17.5km from the turbine site to the existing substation in Flagford, located for the most part within the public road corridor. Electricity would be transmitted as a three-phase power supply via three individual conductors, each of which would be laid in a separate duct. The width of a 110kV cable trench would be 600mm, with an average trench depth of 1.3m. Separate ducts will be provided within the trench for fibre optic communications.

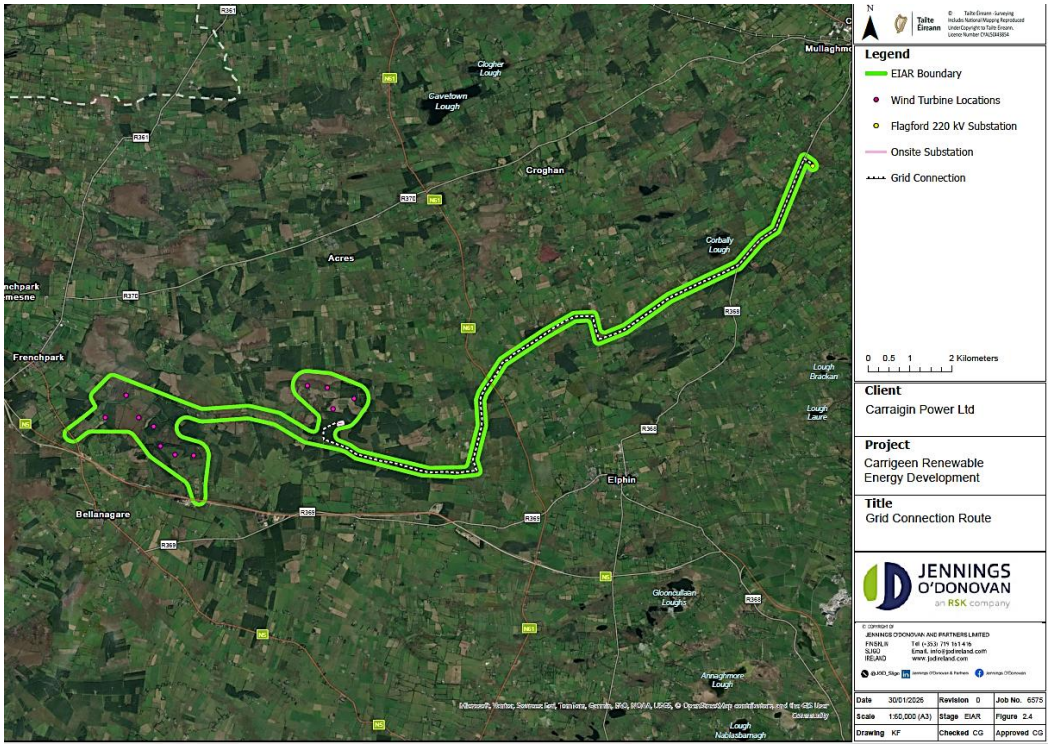

Fig. 6 Turbine site and grid connection route

4.6 Borrow Pits and Temporary Construction Compounds

Two borrow pits are proposed as part of the construction programme. The borrow pits are intended to provide 240,000m^3 of excavated material in order to provide fill for the development of site access roads, turbine hardstands and the proposed temporary construction compounds. The borrow pits would be excavated as required, with rock being extracted from the borrow pits by rock breaking and rock blasting.

Up to six temporary construction compounds would be developed, for use as a secure storage areas for construction materials and accommodating staff welfare facilities. The compounds would contain cabins for offices space, meeting rooms, canteen area, a drying room and other personnel facilities. Servicing arrangements at each compound would include water supplied by a water bowser and the development of an enclosed wastewater management system, consisting of a holding tank, with wastewater being removed off-site weekly, by a licensed wastewater disposal company and disposed at an appropriate licenced facility.

4.7 Proposed Construction Programme

Construction of the proposed development is estimated to take between 18 and 24 months. 'Generally' proposed working hours during the construction period are 07.00 – 19.00 Monday to Friday and 08.00 to 13.00 on Saturdays. However, documentation includes a caveat that operations would be necessary outside of those stated hours "to facilitate turbine foundation construction and so that lifting operations are completed safely." The applicants propose that construction hours during the construction of the turbine foundations would be agreed with Roscommon County Council. Between 80 – 100 construction workers would be employed during the peak construction period.

The sequence of the construction programme as detailed in the submitted documentation is as follows:

1. Site preparation, including felling and drainage
2. Site access roads
3. Temporary construction compounds and welfare facilities
4. Turbine hardstands
5. Turbine foundations
6. Internal cabling
7. Installation of the grid connection
8. Erection of wind turbines
9. Commissioning and energisation

4.8 Wind Farm Operation

As detailed in the formal development description, permission is being sought for a 35 year operational period. The project is estimated to create approximately 21 full time jobs during the operational phase, including across areas such as maintenance, finance, regulatory compliance, security and community relations.

4.9 Decommissioning

The details provided in the submitted documentation confirm that the restoration process following decommissioning of the windfarm at the end of the 35 year operational period would consist of:

- Removal of wind turbines and above ground concrete plinths.
- Removal of all associated underground electrical and communications cabling connecting the wind turbines to the onsite substation (ducting would remain *in-situ).*

All other elements of the development would remain in-situ, including as detailed earlier, the grid connection between the onsite substation and the 220Kv substation in Flagford. Site access roads developed to facilitate construction of the windfarm would be retained to systems will serve ongoing commercial forestry and agriculture activity in the area. All other hard surfaced areas will be allowed to revegetate naturally.

4.10 Community Benefit Fund

A Community Benefit Fund is proposed to be developed, which would be used to bring about "significant, positive change in the local area." A benefit fund development working group would firstly be established and would design the governance and structure of a community entity that would administer the Community Benefit Fund. The value of this fund would be directly proportional to the electricity generated by the wind farm.

5.0 Appropriate Assessment and Environmental Impact Assessment

Within designated site(s):	No
Adjacent to designated sites(s):	Yes
Appropriate Assessment:	Natura Impact Statement submitted.
Accompanied by Environmental Impact Assessment Report:	Yes

5.1 Appropriate Assessment

A Natura Impact Statement (NIS) has been submitted with the application. An Appropriate Assessment Screening Report identified European designated sites on which the proposed development has the potential to result in likely significant effects and the pathways by which those effects may occur. Sites which were identified as having the potential to be affected are:

- Cloonashanville Bog SAC
- Bellanagare Bog SPA
- Lough Gara SPA
- River Moy SAC

The AA Screening process concluded that the potential for the proposed development to result in negative impacts to qualifying features of interest of the Cloonashanville Bog SAC; Bellanagare Bog SPA and Lough Gara SPA could not be ruled out. In addition, the potential for negative impacts to the Annex 2 freshwater species of the River Moy SAC could not be ruled out.

Given that significant effects on designated sites could not be ruled out, it was recognised that the proposed development is required to be the subject of a Stage 2 Appropriate Assessment. In this respect, An Coimisiún Pleanála as the authority responsible for the determination of the subject planning application is also the competent authority responsible for undertaking the Stage 2 Appropriate Assessment, the outcome of which will be a significant consideration in the overall determination of the application. The NIS submitted as part of the planning application examines, analyses and evaluates the potential impacts of the proposed development on European Sites. The NIS will inform the Commission's undertaking of an Appropriate Assessment.

The NIS has been prepared by Doherty Environmental and sufficient details have been provided on the professional credentials and qualifications, for the purposes of compliance with Part XAB of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended).

The overall conclusion reached in the NIS is that subject to the implementation in full of the range of prescribed mitigation measures, the measures will "remove the risk of adverse effects posed by the project to these qualifying features of interest of Cloonshanville Bog SAC, the Bellanagare Bog SPA, the

Lough Gara SPA and the River Moy SAC." The authors of the NIS express their considered view that "the project will not, alone or in combination with other plans or projects, result in adverse effects to the integrity and conservation status of European sites in view of their Conservation Objectives and on the basis of best scientific evidence and there is no reasonable scientific doubt as to that conclusion."

5.2 Environmental Impact Assessment

An Environmental Impact Assessment Report (EIAR) has been submitted as part of the subject application to An Coimisiún Pleanála under Section 37E of the Planning and Development Act 2000 (as amended). The relevant classes/scales of development that require Environmental Impact Assessment (EIA) are set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended). The relevant class of development in the context of the current development proposal is Class 3(i) of Part 2 of the Schedule - "installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts." As the proposed development is in excess of the turbine numbers and output set out in Class 3(i), the undertaking of an Environmental Impact Assessment is a mandatory requirement.

An EIAR is a key information tool in this and any planning application which is subject to EIA. The purpose of an EIAR is to predict and assess likely significant effects (direct and indirect) on the environment arising from the proposed development. It is used during the consent process to inform the competent authority in undertaking an Environmental Impact Assessment. An Coimisiún Pleanála as the Authority responsible for determining the subject application will also be responsible for the carrying out of the Environmental Impact Assessment (EIA) as part of the determination process. It is not therefore the role of Roscommon County Council as a prescribed body to undertake an EIA. Notwithstanding this, in order to ensure that Members are sufficiently briefed on the issues examined and conclusions reached in the Environmental Impact Assessment Report submitted, Section 5.3 (Environmental Considerations) of this report includes a summary, under each of the headings in the EIAR.

5.3 EIAR Summary

5.3.1 Alternatives Considered

In accordance with Article 5(1) of the Environmental Impact Assessment of Projects Directive 20211/92/EU3 as amended by Directive 2014/52/EU4 (EIA Directive), the submitted EIAR includes content regarding the alternatives considered (Chapter 3 of the EIAR). The submitted details relating to alternatives concede at the outset that "*the objective of the applicant was to identify a site capable of producing circa 50MW wind energy project in a suitably zoned location*" and that other technology options (such as solar) were not considered as they were not consistent with the objectives of the project. Details of the alternatives considered essentially focus on alternatives for the delivery of the project on the subject site (in relation to site layout, turbine design, grid connection etc.) but appears to have a distinct absence of explanation on alternative locations considered. The EIAR discussion on alternatives considered focuses on the following:

- 'Do Nothing' alternative;
- Strategic site selection;
- Alternative wind farm site design and layout;
- Alternative number of wind turbines;
- Alternative turbine delivery route;
- Alternative grid connection; and
- Alternative mitigation measures.

The defence put forward for choosing to progress the wind farm proposal rather than the 'do nothing' scenario is that the prospect of creating sustainable wind energy in this area would be lost and there would not be any contribution to Ireland's ability to produce sustainable energy and reduce greenhouse gas emissions to meet EU targets and national targets. The contribution which could be made in progressing the wind farm development is the prevention of approximately 51,600 tonnes of CO_2 emissions per annum, or 1,806,000 tonnes of CO_2 emissions over the proposed 35-year operational life of the wind farm. Other potential benefits which would not arise in a 'do-nothing' scenario relate to socio economic factors, including reference to "an estimated 80-100 jobs during the construction phase of the Project, and 2 long-term jobs once operational"[5] and the potential benefits to the local community through the Community Benefit Fund.

5.3.2 Strategic Site Selection

In discussing the 'strategic site selection', a range of factors are set out:

- "Site location relative to Roscommon County Council's Renewable Energy Strategy (RES) classification of areas considered suitable for wind farm development;
- Low population density;
- Consistent wind speeds;

[5] This is assumed to be a typing error as all other references in the EIAR refer to the creation of 21 jobs in ghte operational stage.

- Protection of visual amenity;
- Low potential for impact on designated National and European sites;
- Located outside areas designated for protection of ecological species and habitats;
- Access to the national electricity grid possible within a viable distance; and
- Sufficient area of unconstrained land that could potentially accommodate wind farm development and turbine spacing requirements."

The EIAR correctly identifies that the proposed site is on lands identified as 'Less Favoured' in the *Renewable Energy Strategy* which forms part of the *Roscommon County Development Plan 2022-2028.* The justification offered for proposing a wind energy development in a 'Less Favoured' area instead of 'Most Favoured' includes reference to the extent of land in County Roscommon which is identified as 'Most Favoured', stating as being 36% of the total area. It is asserted in the EIAR that the applicant prioritised areas designated as 'Most Favoured' in the initial site selection process. A list of factors are detailed, which it is stated resulted in 'Most Favoured' areas not being considered feasible. The factors cited include:

- Existing or proposed wind energy developments, resulting in cumulative visual and environmental impacts.
- Limitations in national grid infrastructure and capacity, restricting connection feasibility;
- Proximity to residential dwellings and businesses, triggering setback requirements that limited viable wind turbines locations.
- Presence of sensitive habitats and flight paths of protected species, particularly airborne species.
- Presence of archaeological sites and protected structures, imposing statutory development restrictions.
- Aviation flight paths and low-flying aircraft considerations, creating safety and regulatory constraints.
- Telecommunication systems interference (avoiding disruption to TV, radio, and wireless networks).
- Landownership consent agreements (lack of agreement with landowners posed significant barriers to any proposed wind farm site assembly and project viability).

Details have not been provided of the any locations considered and discounted in 'Most Favoured' areas.

Points have been set out under a number of headings to support the proposed site selection in the 'Less Favoured' area.

- Separation Distance from Residential Dwellings and Population Density: A setback of four times the tip height (740m) was applied to third-party dwellings in the surrounding area subject to a minimum setback of 500m for involved dwellings. In addition, the chosen site is in an area with a significantly lower population density than the national average (27.6 persons per km^2 versus the national average of 73 persons per km^2.)

- Wind Resource: The Wind Atlas produced by Sustainable Energy shows that wind speeds at the proposed site are suitable for wind energy development.

- Visual Amenity: Reliance is placed on the location of the site in an area classified as being of 'Moderate Value' in the *Landscape Character Assessment* in the *RDP 2022-2028,* noting that this is the lowest of the LCA value ratings.

- Avoidance of European Designated Sites: The EIAR states that the windfarm site is "not located within any area designated for ecological protection. The nearest Natura 2000 sites are listed, including Cloonshanville Bog SAC located 230m north of the closest turbine (T1) and the Bellanagare Bog SAC/SPA located 2.1km south-west of the closest turbine (T2). (Note: The potential impacts on Natura 2000 sites will be examined in detail later in this report in discussing the conclusions reached in the submitted Natura Impact Statement).

- Proximity to the National Grid: Details have been provided of proximity to 110Kv substations in Tonroe and Carrick-on-Shannon and a 220Kv substation in Flagford.

5.3.3 Siting design and layout

The details indicate that the siting design and layout has been informed by a constraints led approach and that the design process has also taken account of the recommendations and comments of statutory and non-statutory organisations, as well as "the local community and local authorities." The design process involved initial desk-based assessments, followed by field surveys and consultations. Sensitive receptors were then mapped and the design constraints were applied. Setback buffers were placed around different types of constraints in order to identify the areas within which no works could take place. The following constraints and resultant set back buffers have been detailed as determining factors in devising the layout:

- Distance to major watercourses of at least 50m.
- Distance to minor watercourses (e.g. land drains) of at least 10m, where possible.
- Dwellings – a minimum 500-metre setback and 4 times the turbine tip height for non-involved inhabited properties.
- Avoidance of sensitive habitats.
- The mapped 1:1,000 year flood event extents at wind turbine locations.

Details have been provided of the iterative process of the design and layout, which initially included 14 turbines, was later refined to 12 and finally to the submitted proposal for 11 turbines.

5.3.4 Grid Connection Alternatives

The key determinant in relation to the grid connection is the requirement for a connection from the proposed windfarm to a 110 kV or 220 kV substation. Chapter 3 of the EIAR sets out the two options that were considered, with Option 1 being a connection to the existing substation in Flagford or Option 2 being a connection to the existing Tonroe substation. In each instance, the options involved underground connections (with three variations being considered for the Flagford connection and only one to the Tonroe substation). No details have been provided of consideration being given to alternative options to underground connections.

5.4 Planning Policy

The EIAR asserts that "the Project has had regard to the National Planning Framework, the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region Assembly and the Roscommon County Development Plan 2022-2028." Notable commentary includes assurances that the proposed development would help to meet the objectives of the Climate Action Plan 2025, would contribute approximately 62.7MW of renewable wind energy to the national CAP25 target of 9GW by 2030, with this 62.7MW also accounting to the 262MW wind energy potential in County Roscommon.

Chapter 4 of the EIAR includes a comprehensive list of applicable policies (Table 4.1 of the chapter), followed by extensive detail on the policy provisions. The document references the location of the proposed site in a 'Less Favoured' area but does not provide a further justification. Whilst it is noted that Figure 4.2 (re-produced below) incorrectly references the 'Roscommon CDP 2021-2028', it is relevant to confirm that the designations as they pertain to the subject site remained the same in the adopted *Roscommon County Development Plan 2022-2028.*

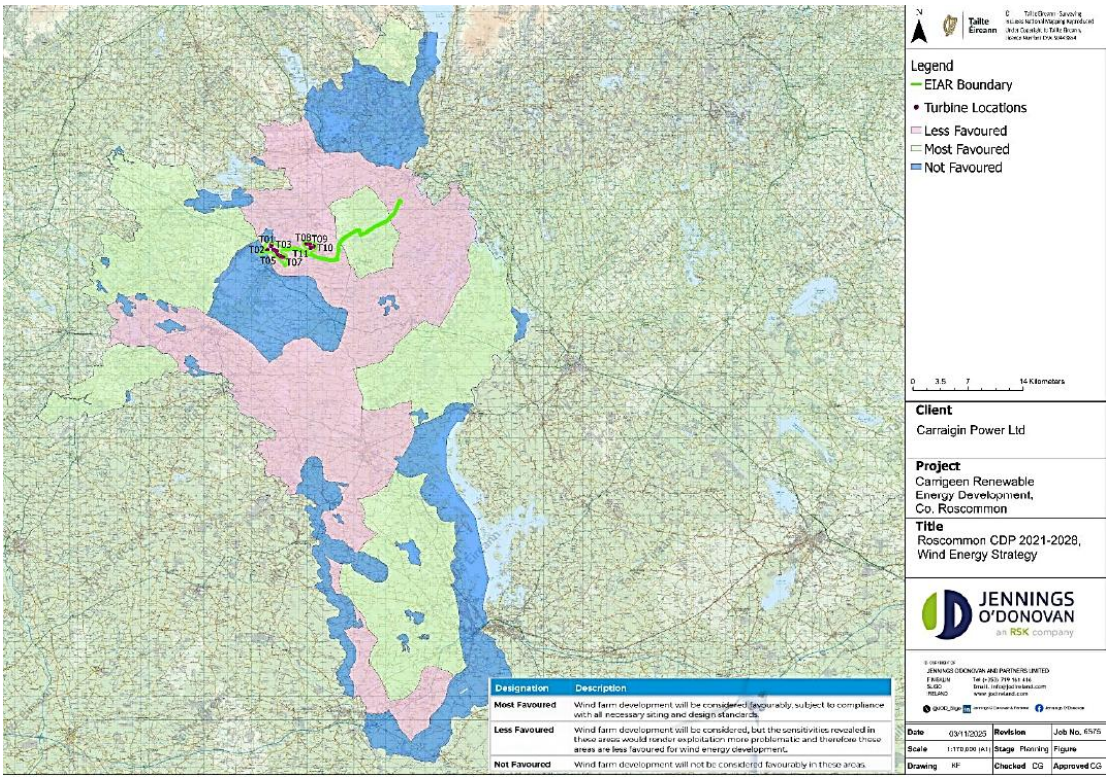

Fig. X: Proposed development in the context of RCC's Wind Energy Strategy Map (outdated reference in legend) (Source: Chapter 5 – EIAR).

5.5 Population and Human Health

In assessing the impact of the development on population and human health, the EIAR examines the potential effects of the construction and operation phases of the project on socioeconomics, tourism and recreation and land use. These factors were examined across three study areas –local (comprising of the electoral areas of Bellanagare, Frenchpark, Mantua, Lisgarve, Kilmacumsy), county and country level.

Chapter 5 contains details of consultations "carried out with relevant organisations" during the initial stage of the EIAR preparation in order to identify effects on population and human health. The only 'organisation' detailed in the associated Table 5.2 is the HSE.

Whilst Chapter 5 acknowledges that impacts on human health are generally associated with electromagnetic fields, shadow flicker and noise, those aspects are assessed in more detail in subsequent chapters of the EIAR. In terms of impacts on population and settlement patterns, generalised conclusions are reached, suggesting that a "renewable energy supply could potentially be attractive for companies looking to develop in County Roscommon and be located in the vicinity of the project." It is predicted that the overall effect of the development at the local level would be a 'slight positive' with this prediction being based on potential increased business being attracted to the area during the operational phase and the potential relocation of construction workers to the area for the duration of these phases.

The EIAR predicts that 'economic activity' would benefit from all phases of the proposed development, including construction and operation, with the local sourcing of some materials and job opportunities during the construction phase being referenced in support of this position. Tourism is discussed in a local and county context, with local attractions identified including Felt Fairies, the Douglas Hyde Interpretative Centre, Elphin Windmill and Lough Gara Lake and Legends Bogland Trail, while county level attractions listed include the Rathcroghan Archaeological Complex, Lough Key Forest and Activity Park, the Beara Breifne Way, Roscommon Castle, Clonalis House, Arigna Mining Experience and Strokestown House. Chapter 5 includes a discussion on tourist attitudes to windfarm developments. The EIAR asserts that "whilst overall effects on the tourism economy are considered to be negligible and not significant, the benefits to individual businesses will be substantial and significant."

5.6 Biodiversity

Chapter 6 of the EIAR deals with biodiversity.[6] At the outset it is noted that the proposed wind farm site consists predominantly of "cutover raised bog, wet grassland, commercial conifer plantation , agricultural pasture and a network of drainage channels and lowland rivers which are part of the wider River Shannon catchment. The Breedoge River is the most prominent of the river features through the site. It is also highlighted that no area of the proposed site is within any designated site, albeit that there are a number of such sites in relatively close proximity.

Details are provided in Chapter 6 of the various desk based assessments and ecological surveys which were undertaken between 2023 and 2025, including habitat surveys, protected mammal surveys, bath surveys, amphibian and reptile assessments and targeted habitat condition surveys for marsh fritillary butterfly. Reference has also been made to consultations with relevant ecological parties, including the National Parks and Wildlife Service and Bat Conservation Ireland. Potential biodiversity impacts were examined in the context of the construction operation and decommissioning phases of the proposed wind farm. The EIAR acknowledges potential effects including temporary habitat loss, disturbance to protected

[6] Chapter 6 on Biodiversity has been prepared by Doherty Environmental Consultants (DEC) Ltd. The professional credentials of the authors have been detailed in the submitted documentation.

species, hydrological alteration of wetland areas and risks to water quality from sediment or accidental pollution. Reliance is placed on the development of a detailed mitigation strategy to address and offset the effects. The mitigation strategy includes the creation of buffer zones around water courses, the scheduling of works to ensure the protection of sensitive species, habitat reinstatements and the implementation of a Construction and Environmental Management Plan (CEMP). The initial CEMP has been included as an appendix in the EIAR.

In relation to biodiversity, the EIAR concludes that subject to the strict application of mitigation measures, "significant adverse effects on the integrity or conservation status of designated sites, protected species or important habitats can be avoided, and that residual ecological effects will be localised and not significant at county, national or international level.

5.7 Bat Ecology, Ornithology, Aquatic Ecology

5.7.1 Bats

As detailed in Chapter 7 of the EIAR which focuses on bat ecology, for the purposes of the bat impact assessment and baseline surveys, the main study area included all the land within the redline boundary, with particular focus on wind farm site and wind turbine locations and a 200 metre area buffering proposed wind turbines. In addition to desk top research, bat activity surveys (using static detectors) were undertaken during the 2025 bat activity season, over spring, summer and autumn. Bat roost surveys were also undertaken at any structures occurring within a 200m buffer distance of the proposed turbine locations (with structures being in proximity to Turbine No. 2 and Turbine No. 6). Mature trees occurring within a 200 metre radius of proposed turbine locations were assessed for their potential to function as roosts for bats and, where required were surveyed for the presence of roosting bats. Relevant locations in this context were in the vicinity of proposed turbines 1, 2 and 6.

Key findings from the various surveys are that six bat species were detected, although bat activity across the site was classified as 'predominantly low.' The proposed development is classified as presenting a 'Medium Risk' due to site and turbine size and the presence of moderate to high quality foraging habitats. Potential risks to bats have been identified, including collision risk in the vicinity of proposed turbines 1, 2 and 6; habitat loss arising from clearance of some plantation and scrub around turbine locations; and displacement as bats may avoid foraging near active turbines. Mitigation measures proposed include the establishment of bat buffer zones and habitat enhancement. In relation to the latter measure, reference is made to the Biodiversity Enhancement Management Plan (BEMP) which includes proposals for the planting of new native hedgerows and broadleaved woodland at locations away from the proposed turbines. There is also a commitment to monitor bat activity during the first three years of operation of the wind farm development and additionally, all site lighting will be designed to minimise light spill to avoid bat disturbance.

Subject to the implementation of mitigation measures, the EIAR concludes that the proposed development "will not have a significant long-term impact on local bat populations."

5.7.2 Ornithology

Chapter 8 of the EIAR focuses on the potential impact of the proposed development on bird populations and their habitats. The potential impacts are examined in the context of the construction, operation and decommissioning phases of the proposed development. The study area for the recording of flight activity and bird assemblages and population examined the proposed development site and a 500m buffer area surrounding same. The study area was also extended to 2km beyond that. Desk studies and field surveys were carried out.

During the breeding season, surveys were undertaken at various different times during the day, ranging from early morning to late evening, in order to record patterns of bord activity. The EIAR also details observations at various times since 2022 during the non-breeding season.

Through vantage point surveys during the bird breeding season, 14 species were observed. During transect surveys (site walkovers) a total of 53 species were recorded during breeding and non-breeding seasons. At the operational phase, impacts include bird collision risks as a result of rotating turbine blades although detailed modelling indicates that the effect to commonly occurring species would be 'long term imperceptible.' The presence of turbines also has the potential to result in avian flight paths being altered between foraging and roosting areas.

A range of protective mitigation measures are identified to minimise effects. Pre-construction surveys are proposed to be undertaken and would be overseen by an appointed Ecological Clerk of Works. In addition, measures detailed in the Construction and Environmental Management Plan (CEMP) and Biodiversity Enhancement Management Plan (BEMP) are also being relied upon as part of the suite of mitigation measures. Seasonal restrictions on construction work are also proposed to be put in place in the event that pre-construction surveys detect sensitive nesting sites.

5.7.3 Aquatic Ecology

Chapter 9 examines the impact of the proposed development on rivers, streams, drainage ditches and the species that depend on them. In order to establish a baseline, walkover surveys were undertaken, water quality sampling was undertaken and searches were undertaken (under license from the NPWS) for white-clawed crayfish which is a protected species. Findings of the assessments included that several local waterbodies have a 'moderate to poor' status and that the local streams and drains are hydrologically linked to sensitive downstream areas, including a number of Natura 2000 designated sites.

Potential impacts identified at the construction stage involve the release of sediment or pollutants into watercourses and it is considered that this can be mitigated by adherence to appropriate measures contained in the CEMP. Potential impacts during the operational phase are considered to present a lower risk. Overall, it is concluded that the proposed development would have a negligible to low residual effect on the aquatic environment.

5.8 Geology and Soils

Chapter 10 assesses the potential likely effects on the land, soils and geology environment of the proposed development. The assessment was based on desk studies, walkover surveys and site investigations. A range of potential effects were identified, including:

- Compaction, erosion and degradation of soils
- Effects on land use
- Effects caused by subsoil and bedrock removal
- Effects of earthworks activities
- Storage and stockpiles including spoil management
- Effects caused by vehicular movement - compaction, erosion and degradation of soils arising from vehicular movement.
- Ground stability and failure - stability issues and slope failure arising from construction activities.
- Soil and groundwater – pollution of groundwater aquifer
- Effects caused by soil and groundwater contamination, arising from: hydrocarbons, waste water and sanitation, cement, construction spoil and general waste.
- Degradation of sites of designated importance.

The EIAR generally concludes that subject to the implementation of specific mitigation measures (for example comprehensive pollution control measures, avoidance of weak, sensitive and sloping soils etc.), the proposed development will not result in significant residual effects on soil and geology.

5.9 Hydrology and Hydrogeology

Chapter 11 of the EIAR examines the potential impacts of the development on:

- Existing natural and artificial drainage patterns;
- Water quality of surface water and groundwater;
- Surface and groundwater dependent ecosystems;
- Usage of surface water and groundwater including abstractions;
- Groundwater - surface water interactions; and
- Aquifer systems and their vulnerability.

The proposed site lies within the Breedoge River sub-catchment, which is part of the Upper Shannon system. The EIAR lists water features on-site as including the Carricknabraher, Owennaforeesha, and Mantua Rivers. Designated sites hydrologically connected to the proposed development have also been identified as part of the assessment. Following implementation of the appropriate mitigation measures as outlined in the EIAR no significant effects on this designated site will occur as a result of the proposed development. Following desk top analysis, field studies were undertaken for the purpose of identifying / verifying existing natural and artificial site drainage characteristics and hydrological features, and undertaking surface water quality sampling.

Overall, the EIAR concludes that there will be no significant effects to surface water (quality and flows) and groundwater (quality and quantity, and any local groundwater wells as a result of the proposed development, subject to the implementation of the proposed mitigation measures.

5.10 Landscape and Visual

Chapter 12 sets out the distinct differences in the assessment of (i) landscape impacts and (ii) visual impacts. Landscape Impact Assessment (LIA) is described as "changes in the physical landscape brought about by the Project, which may alter its character, and how this is experienced" while Visual Impact Assessment (VIA) relates "to assessing effects on specific views and the general visual amenity experienced by people." The latter assessment includes consideration of impacts on scenic amenity designations, centres of population, transport routes and local communities.

The study area for the purpose of both assessments covers a radius of 20km (which is consistent with the stipulations of the Wind Energy Development Guidelines (DEHLG, 2006)). The study area is described as being characterised by "broad, flat to gently rolling terrain ranging from 60–90m AOD, forming part of a wider bogland basin drained northwards by the Breedoge River toward Lough Gara." Other more distant landscape aspects detailed include the Curlew Mountains, Largan Hill and the Bricklieve Mountains to the north and low drumlins to the east, as well as a prominent ridge near Scramoge and the elevated Sliabh Bawn" both defining the southwest.

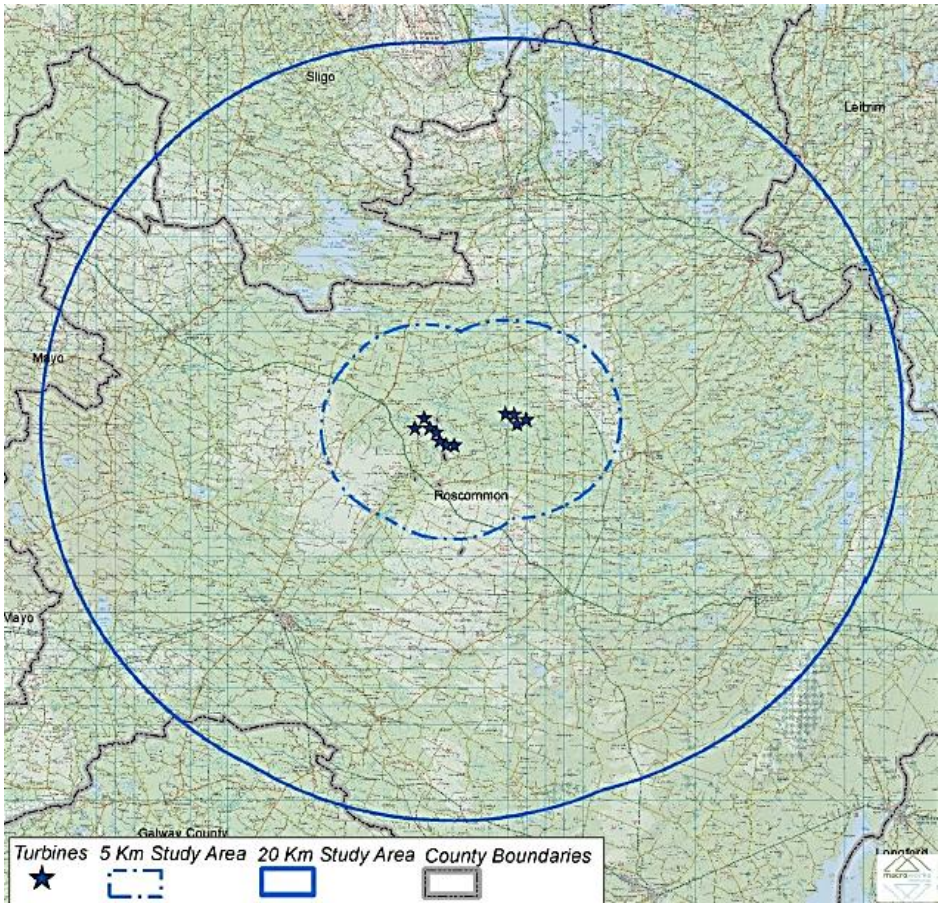

Fig. 7: Landscape and Visual Assessment Study Area (Source: EIAR Chapter 12)

Under the heading of 'Quality and Timescale of Effects', there are several clear acknowledgements of wind farm impacts. The EIAR states that *"In the case of commercial wind energy developments and the associated introduction of new moving structures within rural and upland areas, the quality of the landscape and visual effects will almost always be negative, rather than positive, and unless otherwise stated is the default quality of any identified effect. Where effects are imperceptible or not possible as a result of distance, context, or views being screened by foreground elements, effects are considered Neutral as the proposals neither improve nor reduce the quality of the environment."*

The visual impact assessment examines the impacts on a range of visual receptors, including what are described as 'scenic amenity designations', as well as centres of population, transport routes and 'local community views.' Photomontages have been prepared from twenty five Viewshed Reference Points (VRP), in order to demonstrate the projected visibility of the proposed wind turbines from various sensitive receptors.

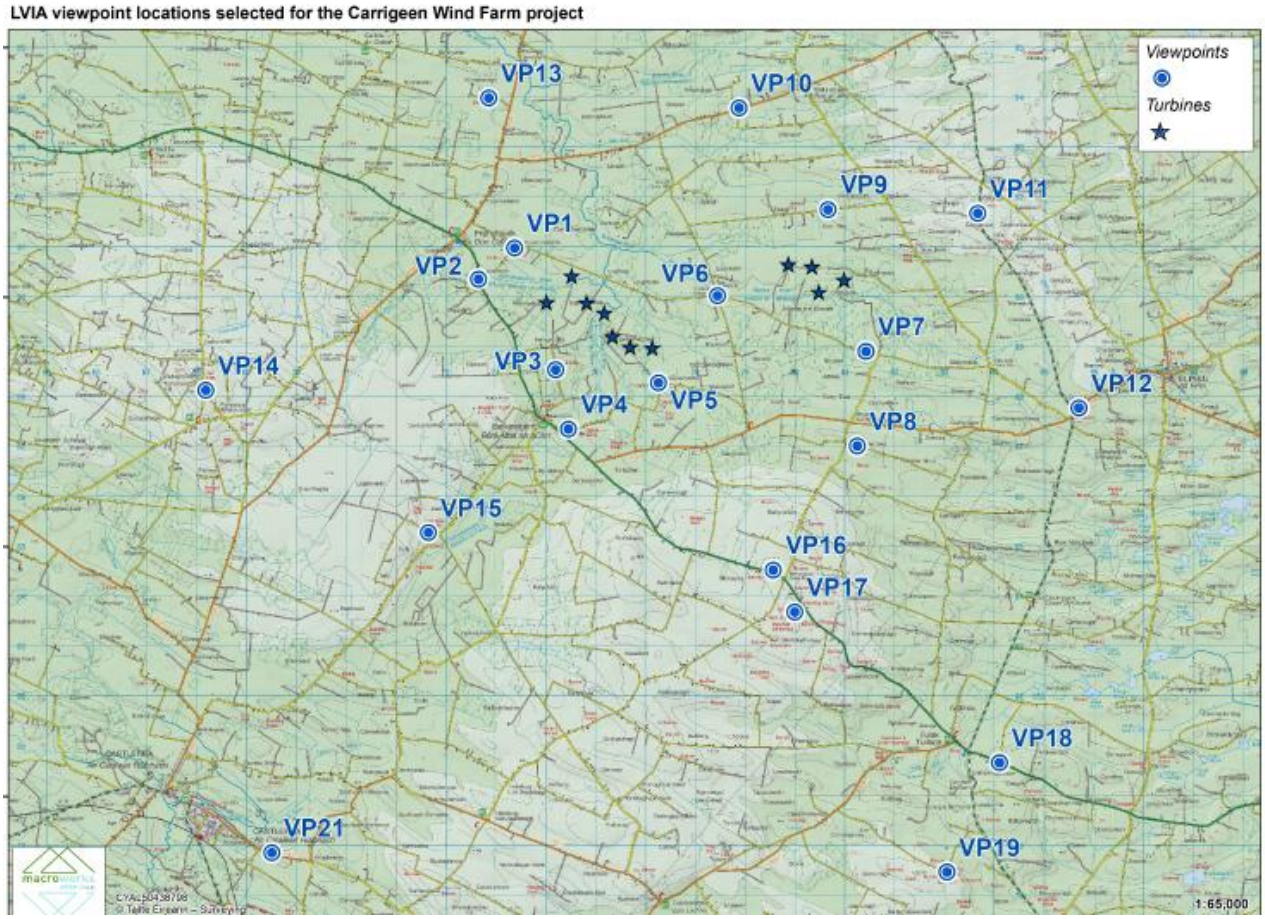

Fig.8: Viewpoint Locations (Source: Volume V - Photomontages)

Fig. 9: Photomontage – Viewpoint 4, Drummin Cemetary, L5642, Bellanagare

Fig. 10: Photomontage – Viewpoint 6, L1217/L5601 cross roads at Brackloon/ Cloonkerin

Fig. 11: Photomontage – Viewpoint 10, R370 at Ballinameen

Fig 12: Photomontage – Viewpoint 16A, Rathmore (or Rath Mor) Mound (Protected Scenic View 12, RCDP 2022-2028)

Fig. 13: Viewpoint 17, Rathcroghan Mound (Protected Scenic View 13, RCDP 2022-2028)

The EIAR sets out that measures to mitigate the landscape and visual impacts of the proposed wind turbines have focused on early stage interventions i.e. through the site selection and development of the turbine layout. It is contended that the turbines present in a legible manner and whilst appearing prominent when viewed from close proximity, the well spaced out positioning, allowing a high degree of visual permeability between turbines results in them not appearing over-scaled, in the broad scale of the landscape and its land cover.

In discussing the landscape character of the area, the EIAR notes, given the 20km radius of the 'Study Area' for the purposes of landscape and visual impact assessment, it encompasses lands which are identified in Roscommon County Council's *Renewable Energy Strategy* in each of the three classifications – 'Most Favoured', 'Less Favoured' and 'Not Favoured' and similarly extends across several landscapes values, as per the Council's *Landscape Character Assessment*, including areas of 'Moderate Value' and 'Exceptional Value.'

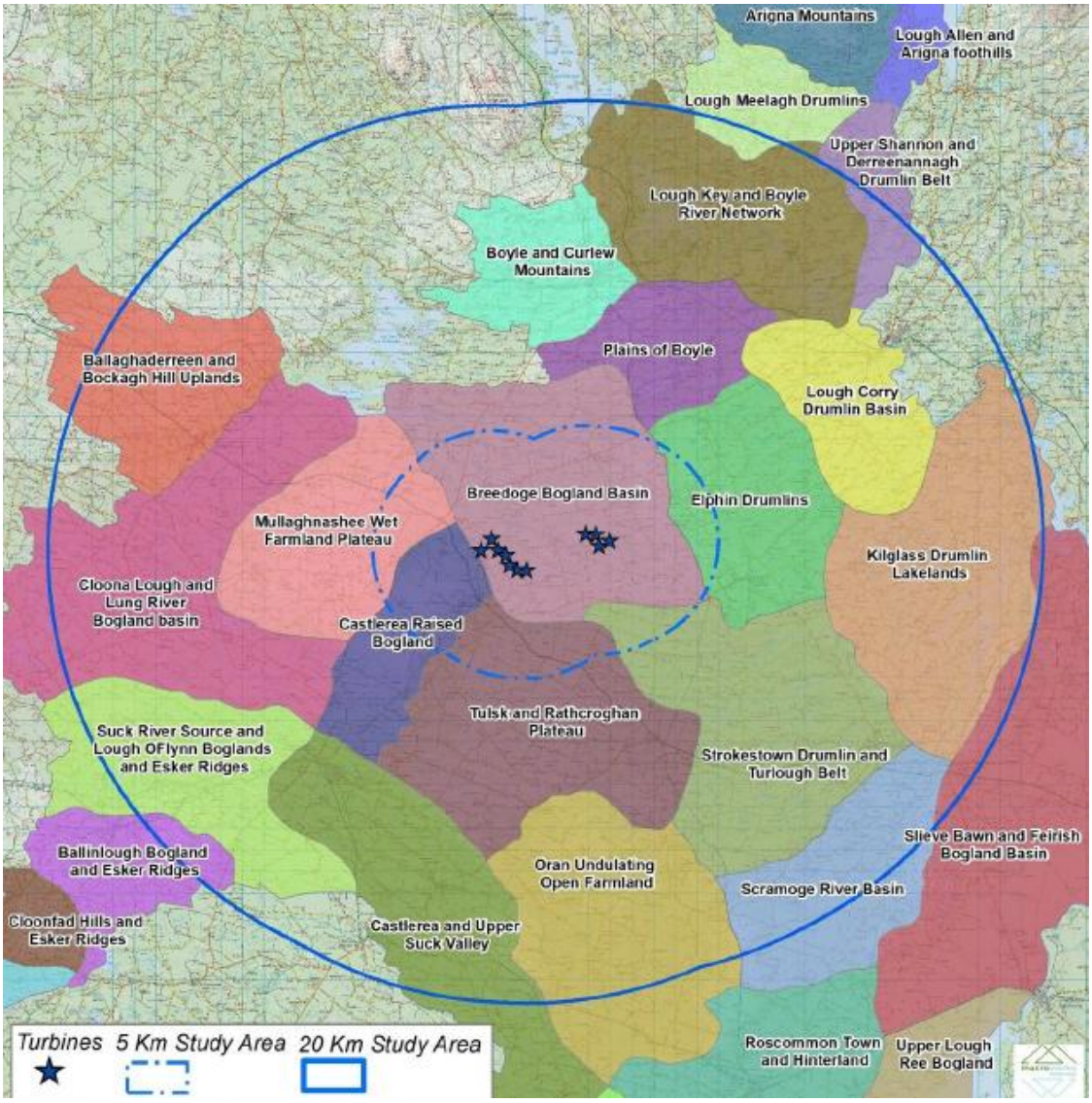

Fig. 14 Turbine location and LVIA Study Area in the context of RCC's Landscape Character Areas (Source: EIAR, Chapter 12)

Over the duration of the operational period, the long-term impact of the proposed wind turbines are recognised to a degree. Whilst the landscape and visual effects of the proposed development are acknowledged in the EIAR as being long term, a certain degree of emphasis is placed on the fact that such effects are not permanent and are considered reversible, with the potential for decommissioning the wind turbines within a one year period. The overall conclusion reached in Chapter 12 is that the proposed development will "result in noticeable landscape and visual changes" which would be most notable in the immediate locality and the landscape of the central Study Area. However, the EIAR conclude that the development is not considered to have "the potential to generate significant landscape, visual or cumulative effects during construction, operation or Decommissioning."

5.11 Noise

In order to inform the assessment of potential noise impacts, baseline noise monitoring was undertaken at six baseline noise survey locations, during two periods (between 30th May and 18th July 2025 and between 19th September and 31st October 2025). The six noise monitoring locations were selected based on desk top assessment and as per the EIAR are considered representative of the local noise environment. The locations were selected due to being the nearest receptors surrounding the proposed wind turbines. The overall 'Noise Study Area' extends to include all residential receptors within 2km of the proposed turbine locations.

The background noise levels recorded at the six baseline survey locations were analysed in conjunction with measured wind speed data for the area. The EIAR contains extensive detail setting out the various technical standards adhered to in the calculation of baseline noise levels. The main noise sources at each of the survey locations were identified as local agricultural activity and wind effects on vegetation. Additionally, road noise from the N5 was also identified as part of the baseline noise at one location.

Explanation is provided that prediction modelling is based on the turbines operating at full power and with all turbines fitted with serrated trailing edge (STE) in order to reduce noise emissions of each turbine.

Content in the EIAR confirms that the development proposal has been designed to comply with the *Wind Energy Development Guidelines* (2006) and to also comply with noise limits applied by An Coimisiún Pleanála in conditions attached to recent planning determinations for wind energy developments. Reference has been made to the *Draft Wind Energy Guidelines* (dating from 2019) and albeit that the guidelines have not been adopted, the development proposal includes a mitigation strategy which would provide for a reduction in sound level outputs in the event of the introduction of more restrictive noise limit levels, as referenced in the draft guidelines.

Noise impacts are examined in the context of construction and decommissioning periods, as well as the operational period. Whilst it is stated that it is not possible to specify the precise noise levels of emissions from the construction equipment until such time as a contractor is chosen and construction plant has been selected, predictions are calculated based on typical noise outputs from a range of construction activities. Table 13.10 in the EIAR sets out a range of predicted construction noise levels. Overall, the EIAR concludes that noise during construction and decommissioning phases of the development "will be managed to comply with best practice, legislation and guidelines current at that time so that effects are not significant."

In respect of noise impacts during the operational phase, Table 13.13 of the EIAR contains analysis of predicted noise levels at 235 properties, at varying wind speeds. The details demonstrate that that the predicted noise levels exceed the daytime noise limit of 45 dB at only one receptor, which is presently an uninhabited derelict dwelling. In addition, the analysis demonstrates that predicted noise levels are higher than the night-time noise limit of 43 dB at one additional receptor at various wind speeds. The EIAR content notes that as the property owner is financially involved with the project, a 45 dB limit may be applied. Overall, predicted noise levels for the operational phase of the development are deemed to

be "compliant with the noise limits and are not significant in terms of EIA" and the EIAR advises that no specific mitigation measures are required.

5.12 Material Assets

At the outset of Chapter 14, it is explained that the Material Assets chapter evaluates the likely significant direct and indirect effects of the proposed development on physical and economic resources, including infrastructure, buildings, natural resources, and cultural heritage.[7] Potential impacts have been examined in the context of the construction operational and decommissioning phases.

Land use: The majority of the main site area where the turbines, substation, etc., are proposed to be located is described as being mostly non-agricultural and presently used for commercial forestry or is cutaway bog that has historically been used for peat cutting. Over the entirety of the wind farm site, 233 hectares have been determined to be commercial forestry. Approximately 43.7 hectares of commercial forestry will be required to be felled to facilitate the development of seven of the eleven proposed wind turbines.

Identified changes to the existing land use include a change from a peat cutting area to wind farm use to accommodate four of the eleven turbines; and a change from agricultural use to wind farm use to accommodate one turbine and with this considered to represent a long term medium slight negative impact on agricultural land use due to the removal of grazing lands for the duration of the operational periods. The extent of the land area involved in this respect is 0.5 hectares and consequently this has not been determined to constitute a significant impact on agricultural land use. The EIAR sets out that a 'Mitigation by Avoidance' strategy has been used in order to minimise alterations to the existing land use, with the project footprint being kept to the minimum necessary and efforts made to utilise existing forestry access tracks where possible.

Telecommunications: It is acknowledged in the EIAR that "during operation, the proposed wind turbines have the potential to interfere with electromagnetic signals passing above the ground due to the nature and size of the project." Details are provided of the telecommunications operators that were contacted during the EIAR preparation process,[8] none of whom raised any concern regarding impacts on the telecommunications networks. The EIAR commentary asserts that "all responses received from telecommunications consultees have stated that the project will have no effect on their telecommunications services." No significant effects are predicted on telecommunications or radio reception as a result of the proposed development.

Electricity Networks: The EIAR explains that the nationwide electricity transmission system allows for the transport of large volumes of electricity from generation stations, including wind farms, to bulk supply points near the main population centres where it interconnects with the distribution system. It is noted that the proposed grid connection route will be located along private lands and public roads/verges and constructed and installed according to the requirements and specifications of EirGrid and ESB Networks.

[7] Notwithstanding this explanation, Chapter 15 specifically discussed Cultural Heritage.

[8] Consultation details contained in Table 14.1 of the EIAR.

No significant negative impacts on the grid connection route are anticipated and overall, it is contended that wind energy project would contribute directly and over the long term to the electricity network.

Air Navigation: All structures over 150m in height are required to have lighting to warn aviation traffic. Consultation has taken place with the Irish Aviation Authority and the EIAR confirms that in accordance with IAA requirements, an obstacle warning light system will be incorporated and wind turbine locations will be added to aviation maps prior to construction.

Utilities: Consideration of impacts on utilities pertain to gas, water and waste infrastructure. The EIAR references engagement with utility providers at the EIA scoping stage. There are no gas mains located within the project site and therefore no potential effects. Existing public water and wastewater infrastructure in the EIAR boundary is operated and managed by Uisce Éireann. Construction of the proposed development is not expected to result in significant effects on existing Irish Water infrastructure.

5.13 Cultural Heritage

The reference to 'Cultural Heritage' is explained in Chapter 15 of the EIAR as the "over-arching term applied to describe any combination of archaeological, architectural, and cultural heritage features." Details are provided of consultations undertaken with statutory and voluntary bodies in order to gain insight into the cultural heritage of the study area. Consultations were undertaken with the Department of Housing, Local Government and Heritage and also with the National Museum of Ireland. The World Heritage Unit (WHU) of the National Monuments Service, the County Roscommon Heritage Officer and the Royal Sites of Ireland Project Coordinator were consulted and reference is made to an onsite meeting taking place with Roscommon Couty Council's Heritage Officer and the Royal Sites of Ireland Project Coordinator in October 2025 in order to discuss the scope of the Heritage Impact Assessment.

Table 15.1 (Study Area Definitions) in the EIAR has been reproduced overleaf in order to provide clarity on the differing cultural heritage sites examined and assessed, dependent on the proximity to / distance from the proposed wind turbines.

Table 15.1: Study Area Definitions

Project Element	Study Area	Site Types
Wind Turbines	10km from the proposed Wind Turbines	All sites of Internation and National significance, including United Nations Educational, Scientific and Cultural Organization (UNESCO) WHP (and tentative list), National Monuments under state care or guardianship and any sites subject to a Preservation Order.
Wind Turbines	5km from the proposed Wind Turbines	All archaeological, architectural and cultural heritage assets subject to statutory protection, including sites listed in the Record of Monuments and Places (RMP) and Record of Protected Structures (RPS),
Project Element	**Study Area**	**Site Types**
		National Inventory of Architectural Heritage (NIAH) structures and demesne landscapes.
Wind Turbines	2km from the proposed Wind Turbines	All previously unrecorded sites or structures of cultural heritage merit, such as buildings of architectural heritage merit (not included in the RPS/NIAH) and archaeological sites not included in the RMP.
Grid Connection	50m	All recorded and previously unrecorded cultural heritage sites.
TDR intervention points	50m	All recorded and previously unrecorded cultural heritage sites.

The EIAR recognises that the proposed development is located in a rich historical landscape. Key heritage assets identified within the study areas include:

- Rathcroghan Archaeological Complex (which is noted as being on the UNESCO World Heritage Tentative List);
- Recorded Monuments: 229 recorded archaeological sites within 5km of the turbines, including ringforts, burial mounds (barrows), and prehistoric cooking sites (fulacht fia);
- National Monuments: Besides the National Monuments associated with Rathcroghan Archaeological Complex (AH1) there are two National Monuments located within the 10km Study Area of the Project (a High Cross and Ringfort and Ogham Stone;
- Architectural Heritage: 14 recorded structures of architectural merit and 71 previously unrecorded sites of cultural interest were identified.

The following is a summary of the EIAR findings in respect of impacts on the cultural heritage of the area.

Construction Phase: Ground-clearing works may have potential direct effect as they could potentially damage or destroy unknown archaeological remains buried beneath the surface. The EIAR notes that there is a risk of encountering previously unrecorded "sub-surface" archaeology.

Operational Phase: The potential impacts of the turbine structures on the on the setting of historical monuments, including the visibility from the Rathcroghan Archaeological Complex is recognised. Such an impact has been classified as indirect. No direct effects on archaeological, architectural and cultural heritage resource are noted during the operational phase of the Project.

Grid Connection: Given the underground nature of the grid connection, it has been determined that any a long-term visual impact would be negligible.

Mitigation measures proposed primarily pertain to archaeological considerations and include the employment of an archaeologist to oversee ground disturbing works and the undertaking of targeted pre-construction surveys, with all such investigative works being carried out under license from the National Monument Services.

5.14 Traffic and Transport

Chapter 16 examines the traffic and transport impacts of the proposed development across several distinct elements of the development:

- Construction of the project,
- Construction of grid connection.
- Transportation of wind turbine components on the public road network between the Port of Galway and the Project (the turbine delivery route (TDR)).
- Enabling works for the transportation of wind turbine components on the public road network between the Port of Galway and the project.
- Operation and maintenance of the project.
- Decommissioning of the project.

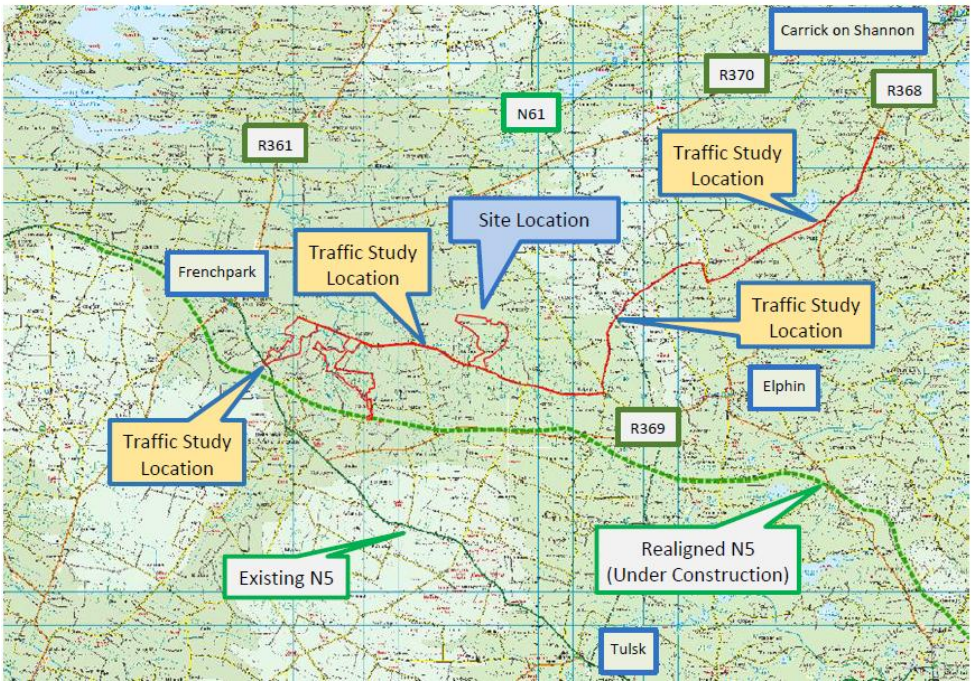

Fig 15: Traffic Study Area (Source: EIAR Chapter 16)

The details in Chapter 16 are supported by a Traffic and Transport Assessment (TTA), Traffic Management Plan (TMP), Turbine Delivery Route (TDR) Swept Path Analysis – Port of Galway and a Road Safety Audit (RSA). All are contained in EIAR appendices.

The Study Area for the Traffic and Transport Assessment is focused on the public road network and its associated junctions and sensitive receptors.

The overall conclusions reached in respect of traffic and transport impacts are that, subject to appropriate mitigation measures being employed, impacts at construction stage at considered to be 'slight / moderate' on both the local road network and the national and regional road network; effects on the public road network are 'not significant'; and 'slight / moderate' on all categories of the road network at the decommissioning stage.

5.15 Shadow Flicker

The EIAR defines shadow flicker as "an effect caused by the sun shining behind the rotating blades of a turbine relative to a nearby sensitive receptor which causes a momentary shadow on a window of that sensitive receptor." Shadow flicker only therefore has the potential to arise during the operational phase of the proposed development. The study area was defined as 10 times the widest possible potential rotor diameter within the range (10 x 163m = 1,630m) and the point is made that as per the *Wind Energy Guidelines* (2006) "*at distances greater than 10 rotor diameters from a turbine, the potential for shadow flicker is very low."*

In summary, the following potential shadow flicker effects were identified: apter

- Potential effect at 117 out of 145 sensitive receptors;
- In a worst case scenario, shadow flicker at 45 of the sensitive receptors could exceed 30 minutes within 24 hours.

The main mitigation measure proposed to minimise the potential effects is the installation of a blade shadow control system. Subject to this installation, shadow flicker effects have been determined to have 'no significant direct or indirect effects.'

5.16 Air and Climate

5.16.1 Air

Chapter 18 of the EIA deals with Air, while Chapter 19 is concerned with Climate. Significant detail is contained at the outset of Chapter 18 on air quality standards to be adhered, as well as commentary on existing air quality conditions in Ireland generally, and also locally. The closest monitoring site to the proposed development is in Roscommon Town, with records showing that mean guidelines "were not breeched on any day in 2024."

The main potential impact in air quality arising from the proposed development would be at the construction stage, when there is the potential for the generation of dust from excavations and from

construction activity. The extent of the impact would be dependent on factors such as terrain, weather conditions and the proximity of receptors. If unmitigated, dust may have a 'slight, negative, short-term, direct effect' on workers on site and on local road users. The EIAR details that dust would impact receptors within approximately 250 metres, with the dust typically being generated by activities relating to the turbine construction. In relation to this, the EIAR highlights that all proposed turbines are located at least 740 metres from inhabited properties. In addition, vegetation in the vicinity is also cited as a means of mitigating any airborne dust migrating off the proposed site. Overall, the potential effect of dust is described "short-term, temporary and slight negative and not sensitive on sensitive receptors and there would be "no likely significant effect on air quality from an increase of dust emissions during the construction phase."

The EIAR also considers the impacts of exhaust emissions on air quality during the construction stage and considers that the effect would be 'short term, slight negative and not significant' and would not result in any likely significant effect on air quality.

The potential for air quality impacts at the operational stage are considered to be negligible with dust admissions being minor and arising from vehicle movement and similarly exhaust emissions arising from vehicular movements. Only a small number of light vehicles would access the site on a weekly basis.

The EIAR also emphasises the long-term, significant, positive effect on air quality arising from the wind energy project, as it would provide an alternative to electricity generation otherwise derived from coal, oil or gas-fired power stations.

Finally at the decommissioning stage, which is estimated to be for a period of between three and six months, air quality effects from either dust or exhaust emissions are predicted to be imperceptible.

5.16.2 Climate

Chapter 19 assesses the climatic environment of the area in which the development is proposed and examines the potential effects on climate through greenhouse gas (GHG) emissions during each of the three phases of the project i.e. construction, operation and decommissioning. The EIAR determines that the proposed development does not contain any element which will produce greenhouse gas emissions or odorous emissions when operating and that it would instead positively contribute to a net national reduction in the emissions of greenhouse and other gases resulting from the combustion of fossil fuels. In generating electricity, the proposed wind energy development would offset generation from other carbon dioxide emitting sources, resulting in estimated savings of approximately 51,558 tonnes of carbon dioxide emissions per annum.

In conjunction with other renewable energy developments, the proposed wind energy project is noted in the EIAR as having a major, positive effect which would contribute to achieving Ireland's binding emission reduction targets. In operational mode, the effect on climate is assessed to be cumulative, long-term, significant and positive.

5.17 Major Accidents and Natural Disasters

At the outset of Chapter 20, the EIAR sets out obligations under the EIA Directive and the Planning and Development Regulations 2001 (as amended) requiring assessment of *"the expected significant adverse effects of the project on the environment deriving from the vulnerability of the project to risks of major accidents and/or natural disasters which are relevant to the project concerned."* Consequently, the objective of the assessment in Chapter 20 is to ensure that appropriate precautionary actions are taken for the proposed project.

Chapter 20 essentially involves the undertaking of a risk assessment. In order to undertake this, a desktop study was completed to establish the baseline environment. The site specific assessment involved risk identification, risk classification, likelihood and consequence and risk evaluation. Tables 20.1 and 20.1 in the document explain the classification system. A risk matrix is also included, which reflect the DHLGH's *Guide to Risk Assessment in Major Emergency Management*. The HSE Emergency Management: Emergency Plan for 'Area 2' (Galway, Mayo and Roscommon) have also been examined, in which hazards are categorised into four groupings – natural, transport, technological and civil. The risks of most relevance to the proposed development are examined in detail under those categories.

Under 'natural hazards' for example, risk factors relating to meteorology, hydrology and peat stability have been examined. In relation to hydrology, it is noted that all proposed built development would be sited in Flood Zone C, with the exception of access tracks, which by necessity cross watercourses. A Flood Risk Assessment has been undertaken and forms part of the submitted application documentation. It has been determined that the proposal will not have an effect on flood risk elsewhere. In relation to peat stability, reference is made to the preparation of a Peat Landslide Hazard Assessment which then informed the design and layout of the project. That assessment determined that a peat landslide hazard is moderate, without mitigation. A similar assessment was also undertaken for the proposed site access road network. Subject to mitigation, the proposed development has been determined to be in the negligible to low risk range in relation to peat stability.

In terms of accident risks arising from transport movements, Chapter 20 acknowledges that increased volumes of traffic will be generated by the proposed development during the construction and decommissioning periods, but points to the Traffic and Transport Assessment which has been carried out and which demonstrates that the existing public road network can accommodate the additional traffic generated. Reference is also made to the submitted Traffic Management Plan, noting that it will be further developed prior to the commencement of development and will be informed by engagement between the appointed contractor, An Garda Siochana and the local authority.

In the context of major accidents / natural disasters, one of the highest risk scores identified was associated with 'Contamination,' where groundwater and surface water could be contaminated from the potential release of hydrocarbons, earthworks and excavations onsite. In minimising this risk, emphasis is placed on the preparation of a Construction and Environmental Management Plan (CEMP), which forms part of the submitted application documentation. The CEMP includes a range of environmental controls to be implemented onsite, including onsite drainage measures, peat stability monitoring measures, waste

management and pollution prevention measures for refuelling and managing hazardous materials and cement-based products.

The overall conclusions reached in the EIAR in respect of the risk of major accidents and natural disasters is that the risk is 'low' in accordance with the 'Guide to Risk Assessment in Major Emergency Management' (DHLGH, 2010). Reference is made to the project being designed in accordance with the best practice measures and as part of this "mitigation against the risk of major accidents and/or disasters is embedded through the design."

5.18 Interactions of the Foregoing

The purpose of the final chapter of the EIAR, entitled 'Interactions of the Foregoing' is to identify significant interactions and interdependencies in the existing environment. An extensive matrix has been produced in Table 21.1 in the chapter to demonstrate the interactions of effects during each of the three phases of development i.e. construction, operation and decommissioning. This is followed by Table 21.2 which provides summary commentary (grounded in the assessment and analysis in each of the foregoing specialist chapters) in respect of each identified interaction and the associated measures proposed to minimise any identified effects arising from that interaction.

6.0 Assessment of Compliance with Planning Policy

The following content provides (a) a summary of planning policy applicable to proposed renewable energy development and (b) provides commentary from Roscommon County Council's perspective on the extent of compliance or otherwise of the proposal with the policy position.

6.1 National Policy Context

6.1.1 National Planning Framework – First Revision (2025)

The *National Planning Framework – First Revision* sets out strategic national planning framework for the entire country to 2040. In respect of climate action considerations, it recognises the need to move toward a low carbon and climate resilient society, and it emphasises that rural areas have a strong role to play in securing a sustainable renewable energy supply. It seeks to harness the country's renewable energy potential, achieve a transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050, and promote new energy systems & transmission grids (including on and off shore wind energy).

6.1.2 Climate Action Plan (2025)

The Climate Action Plan 2025 lays out a roadmap of actions to enable Ireland halve emissions by 2030 and achieve climate neutrality by no later than 2050, consistent with the commitments set out in the Climate Action and Low Carbon Development (Amendment) Act 2021. The 2025 Plan is the third statutory annual update to Ireland's Climate Action Plan under the aforementioned Act.

6.1.3 Wind Energy Guidelines

Wind Energy Development- Guidelines for Planning Authorities (2006)

The Guidelines advise that a reasonable balance must be achieved between meeting Government Policy on renewable energy and the proper planning and sustainable development of an area and it provides advice in relation to the information that should be submitted with planning applications. The impacts on residential amenity, the environment, nature conservation, birds and the landscape should be addressed. The Guidelines set out a number of technical considerations in the assessment of applications.

Draft Wind Energy Development Guidelines (2019)

The Draft Guidelines propose several key amendments to the original document in relation to noise, visual amenity, shadow flicker and community engagement. The application of more stringent noise limits in line with WHO noise standards together with a more robust noise monitoring system and reporting system is proposed. The mandatory minimum 500m setback from houses is retained but augmented by a setback of 4 x tip height from sensitive receptors. The Draft Guidelines have not yet come into effect.

6.1.4 Roscommon County Council Assessment - National Policy

At a national strategic level, the principle of a renewable energy development, at scale, accords with the principle of moving toward a low carbon and climate resilient society, through the provision of an estimated electricity generation capacity of approximately 62.7MW and a consequent offsetting of approximately 51,558 tonnes of carbon dioxide per annum which would otherwise be expended to

provide the same capacity. The proposal therefore has the potential to contribute positively to reducing greenhouse gas emissions and given the proposed 35 year operational period, would contribute towards Ireland achieving carbon neutrality by 2050.

In respect of compliance with the 2006 *Wind Energy Development Guidelines* (which continue to remain in effect at the present time), it is acknowledged that the application documentation submitted, including the extensive EIAR, has endeavoured to reflect the requirements of the Guidelines, in respect of the reasonably extensive range of studies undertaken to inform the assessment. It is also acknowledged that there is notable demonstration of adherence to the standards and thresholds set out in the Guidelines relating to noise and shadow flicker. It is also recognised that despite the fact that the *Draft Wind Energy Guidelines* (2019) have not yet been adopted, the proposal has been developed to have regard to the more stringent noise limits, increased set back distances (of 4 times the turbine height) and improved shadow flicker control mechanisms.

There are however aspects of the *Wind Energy Development Guidelines* where the proposed wind energy development appears to be portrayed in an excessively positive manner, with a relatively limited basis offered to support such a position. One notable area is in relation to Section 3.9 (Tourism and Recreation) in the Guidelines, which requires that *"the effect of wind energy development on tourism and recreational activities must be assessed……. but care needs to be taken to ensure that insensitively sited wind energy developments do not impact negatively on tourism potential."* In this context, a degree of concern arises as to the sufficiency of the assessment of the impacts of the proposed development on the Rathcroghan Archaeological Complex, located 3.2km from the nearest proposed turbine and as the foremost cultural heritage feature in the county, is also a significant tourism resource. Whilst the submitted documentation recognises Rathcroghan as a 'key cultural landmark' and a 'tentative World Heritage Site', there is relatively limited assessment provided to justify conclusions reached that, for example, throughout the Landscape and Visual Impact Assessment study area (which includes the Rathcroghan complex), "the sensitivity of visual receptors is considered to be no greater than Medium," that the "level of landscape effect is deemed Moderate-Slight" and that "overall effects on the tourism economy are considered to be negligible and not significant."

6.2 Regional Policy

6.2.1 Regional Spatial and Economic Strategy 2020 – 2032 (RSES)

The RSES for the Northern and Western Regional Assembly (NWRA), provides a twelve-year strategy for the sustainable growth of the region.

The RSES sets out the following regional policy objectives (RPOs) in relation to renewable energy:

RPO 4.17:
To position the region to avail of the emerging global market in renewable energy by:

- Stimulating the development and deployment of the most advantageous renewable energy systems

- Supporting research and innovation
- Encouraging skills development and transferability
- Raising awareness and public understanding of renewable energy and encourage market opportunities for the renewable energy industry to promote the development and growth of renewable energy businesses
- Encourage the development of the transmission and distribution grids to facilitate the development of renewable energy projects and the effective utilisation of the energy generated from renewable sources having regard to the future potential of the region over the lifetime of the Strategy and beyond.

RPO 4.18: Support the development of secure, reliable and safe supplies of renewable energy, to maximise their value, maintain the inward investment, support indigenous industry and create jobs.

RPO 4.19: Support the appropriate development of offshore wind energy production through the adequate provision of land-based infrastructure and services, in line with national policy and in a manner that is compatible with environmental, ecological and landscape considerations.

6.2.2 Roscommon County Council Analysis - Regional Policy

Having regard to the policy position set out in a regional context, which supports and encourages the development of renewable energy, it reasonable to conclude that the principle of the proposed windfarm development is generally compatible with the policy position.

6.3 Local Planning Policy and Planning Assessment

The *Roscommon County Development Plan (RCDP) 2022-2028* provides the local policy framework against which to assess wind energy developments of the nature proposed. The *RCDP 2022-2028* includes a *Landscape Character Assessment* and *Renewable Energy Strategy.*

6.3.1 Roscommon County Development Plan 2022-2028

The *Roscommon County Development Plan (RCDP) 2022-2028* supports the role of alternative energy, such as wind energy, as a sustainable development. Broad policy support for renewable energy and its associated benefits is clearly expressed in the first of fourteen strategic aims detailed for the future development of County Roscommon, in which Roscommon County Council's aspiration is set out to "*Achieve a transition to a competitive, greener, low carbon, climate resilient and environmentally sustainable county, facilitated through reducing the need to travel, by integrating land use and sustainable modes of transport, by reducing the use of non-renewable resources and by promoting and facilitating renewal energy initiatives on a domestic and commercial scale."*

The need to tackle climate change, and the contribution of renewable energy to that cause is a key consideration in the County Development Plan. In the context of Rural Development and Natural Resources (discussed in Volume I, Chapter 5), Section 5.7 specifically addresses renewable energy. The potential for rural areas to accommodate wind, hydro and solar energy projects is recognised and a clear and balanced commitment is expressed that *"the Council will support renewable energy projects in rural areas, subject to ensuring the protection of landscape sensitivities, residential amenity, views or prospects,*

public rights of way, wildlife, habitats, special areas of conservation, protected structures, bird migration paths etc."

Chapter 8 of the Plan expands on this, with the focus of the chapter being 'Climate Action, Energy and Environment.' Policy objectives CAEE 8.1 expresses broad support for European and national objectives for climate action, adaptation and mitigation, while CAEE 8.2 supports the National Climate Change Strategy *"by actively seeking to implement the policy objectives throughout this Plan which contribute to positive climate actions, including those related to renewable energy, sustainable transport, air quality, flooding and the promotion of urban and rural green initiatives."*

Section 8.5 of the Plan focuses on 'Integrating Climate Action into County Roscommon' and reaffirms Roscommon County Council's commitment to transitioning to a low carbon and climate resilient county. The *Renewable Energy Strategy*, which is one of the suite of strategy documents included in the County Development Plan, is recognised as the principle strategy by which to support climate change at the local level. In examining electricity generation in the county at present, the Plan details that 112MW[9] of renewable energy is being generated in the county. The Plan recognises the potential to significantly increase renewable energy output from the current level.

The following policy objectives are of particular relevance in the context of climate action and energy, including policy objectives specifically addressing wind energy:

- **CAEE 8.3**: Support developments and actions that assist in achieving the national targets for energy from renewable energy, from renewable resources and reducing greenhouse gas emissions associated with energy production.

- **CAEE 8.4**: Encourage and facilitate the various forms of renewable energy development detailed in the *Renewable Energy Strategy* that accompanies this Plan (as well as any other new forms of renewable energy which may be developed during the lifetime of this Plan), subject to satisfying the principles of proper planning and sustainable development.

- **CAEE 8.5**: Facilitate wind energy developments primarily in areas designated in the *Renewable Energy Strategy* as "Most Favoured" and secondarily in areas designated as "Less Favoured" in the Renewable Energy Strategy, subject to normal planning criteria and having regard to the *Wind Energy Guidelines* (DECLG, 2006) and any update to the Guidelines that may issue during the lifetime of this Plan. This will include consideration of carbon benefit analysis, as appropriate.

- **CAEE 8.7:** Ensure that proposals for renewable energy developments are considered in the context of relevant EU and national legislation, including in respect of environmental protection. No renewable energy developments will be considered in designated Natura 2000 sites or their surrounding buffer areas.

[9] *Making the Transition to a Low Carbon Society in the Western Region* – Western Development Commission (2020).

- **CAEE 8.8:** Ensure that renewable energy developments do not undermine the preservation and conservation of the natural and built environment and that an appropriate balance is achieved between renewable energy development and preservation of the natural environment.

- **CAEE 8.12:** Facilitate renewable energy proposals that bring about a direct socio-economic benefit to the local community.

The foregoing renewable energy related policy objectives are also reflected in the accompanying *Renewable Energy Strategy.*

Consistent with the national and regional policy position, the *County Development Plan* also provides broad policy support for renewable energy developments. Wind energy is amongst the range of renewable energy technologies detailed in the *Renewable Energy Strategy* which forms part of the *RCDP*. Notwithstanding this broad level of support for wind energy, it then becomes necessary to examine the current proposal in the local county context. As per policy objective CAEE 4, various forms of renewable energy will be facilitated but this is "subject to satisfying the principles of proper planning and sustainable development." In addition, having regard to policy objective CAEE 8.5, wind energy development in the first instance is directed to 'Most Favoured' areas. The proposed location is 'Less Favoured' and limited justification has been provided on the selection of a site in such an area, as opposed to in a 'Most Favoured' area. This will be discussed in further detail in the context of the *Landscape Character Assessment.*

In considering the development proposal in its entirety, including the proposed grid connection, there is a need to consider renewable energy proposals in the context of broader considerations, including in respect of traffic and transport implications, as well as the built environment and natural heritage considerations (including landscape and visual impacts).

The policy position set out in Chapter 7 (Infrastructure, Transport and Communications) of the plan is of relevance in the context of examining the impacts of the proposed development on the public road network.

- **ITC 7.15**: Protect the national road network from inappropriate new access points and the intensification of existing accesses onto or adjacent to National Roads in accordance with the requirements of Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG,2012) in order to maintain traffic capacity, minimise traffic hazard and protect and maximise public investment in such roads.

- **ITC 7.16:** Require all applications for significant development proposals to be accompanied by a Traffic and Transport Assessment (TTA) and Road Safety Audit (RSA), carried out by suitably competent persons, in accordance with the TII's Traffic and Transport Assessment Guidelines.

As noted in Chapter 9 (Built Heritage) of the *Roscommon County Development Plan 2022-2028,* built heritage includes all manmade structures and features of the landscape of the county. The general area is rich in history and it is notable that there are 229 archaeological sites within 5km of the proposed

turbines. Section 9.7 of the County Development Plan focuses on 'Archaeological Heritage' and sets out the policy position in policy objective BH 9.13:

- **BH 9.13**: Secure the preservation (i.e. preservation in situ or, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally. In securing such preservation Roscommon County Council will have regard to the advice and recommendations of the National Monuments Section of the Department of Housing, Local Government and Heritage.

Section 9.8 of Chapter 9 focuses on the Rathcroghan Archaeological Complex, with policy objective BH 9.14 stating the following:

- **BH 9.14:** To support the Rathcroghan Archaeological Complex, as a historic landscape with viable land-use practices and a viable population, by continuing to support initiatives such as the Farming Rathcroghan European Innovation Partnership and the Royal Sites of Ireland application to Ireland's World Heritage Tentative List and progression to designation of the Royal Sites of Ireland as a UNESCO World Heritage Site.

While there is acknowledgement in the submitted planning application of the cultural value of the Rathcroghan complex, as well as its position on the tentative World Heritage List, as noted in the consultation response from Roscommon County Council's Heritage Officer (refer to Appendix 2), the submitted Heritage Impact Assessment places weight on the "limited role that the wider landscape of Rathcroghan plays in supporting OUV."[10] [11] The report from the Heritage Officer counters that it is not possible to reach that conclusion at this time and urges that a precautionary principle should be applied in order not to "set a negative precedent for development which would have such a significant visual impact on the views out from the main elevated monuments in the Rathcroghan landscape, as well as their supporting setting." Indeed, the submitted photomontage of Viewpoints 16 and 17 in the Landscape and Visual Impact Assessment illustrate an impact on the setting of the Rathcroghan complex that would appear to be far more adverse than portrayed in either the Heritage Impact Assessment or the Landscape and Visual Impact Assessment. Having regard to the above, it is difficult to conclude that the proposed development would be consistent with or contribute towards supporting the Rathcroghan Archaeological Complex as per the provisions of policy objective BH 9.14.

Chapter 10 of the Plan deals with 'Natural Heritage' and sets out the policy position in respect of biodiversity in general, as well as specific considerations in relation to European designated sites and Appropriate Assessment, geological heritage and landscape character. In respect of the latter topic, the suite of documents which form part of the Plan includes a *Landscape Character Assessment.* This will be discussed in further detail later in this report.

[10] OUV – outstanding universal value.
[11] Appendix 15.1, Section 5.1.13.

The following policy objectives, as detailed in Chapter 10 of the Plan are of relevance when considering the proposed development:

Biodiversity

- **NH 10.1**: Ensure the protection, conservation and enhancement of the biodiversity of the county.

- **NH 10.4:** Proposals where woodland, tree or hedgerow removal is proposed will be required to demonstrate a sufficient level of protection to Annex IV species, such as Bats and Otter, in accordance with the Habitats Directive.

- **NH 10.5**: Ecological Impact Assessment (EcIA) will be required for proposed developments likely to significantly impact on natural habitats and/or species, and which are not subject to Environmental Impact Assessment.

Natura 2000 Sites and Appropriate Assessment

- **NH 10.7:** Implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011.

- **NH 10.8:** Ensure that no plans, programmes, etc. or projects are permitted that give rise to significant cumulative, direct, indirect or secondary impacts on the integrity of European Sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects, (either individually or in combination with other plans, programmes, etc. or projects).

- **NH 10.9**: Ensure that any plan or project that could have a significant adverse impact (either alone or in combination with other plans and projects) upon the conservation objectives of any Natura 2000 Site or would result in the deterioration of any habitat or any species reliant on that habitat will not be permitted unless in exceptional circumstances.

Cloonshanville Bog SAC is the nearest designated site, with a proposed access road to serve the development being located approximately 125 metres from the SAC boundary. It was determined through the Appropriate Assessment Screening process undertaken by appropriately qualified representatives of the applicant that the potential for negative impacts on qualifying interests of Cloonshanville Bog SAC and three other Natura 2000 sites could not be ruled out. Roscommon County Council agrees with the conclusion reached and with the subsequent need to prepare a Natura Impact Statement to ultimately inform the determining Authority's undertaking of a Stage 2 Appropriate Assessment. It is only through the conclusion of the Appropriate Assessment process that it will be

possible to reach a definitive conclusion on whether or not the proposed development complies with the above referenced policy objectives relating to Natura 2000 sites.

Geological Heritage

- **NH 10.11:** Preserve and protect sites of county geological importance from inappropriate development where they comprise designated sites or national heritage areas.

Woodlands, Trees and Hedgerows

- **NH 10.13:** Encourage the retention of hedgerows and other distinctive boundary treatments in rural areas and prevent loss and fragmentation, where practically possible. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, mitigation by provision of the same type of boundary will be required.

Whilst it is notable that 43.7 hectares of tree felling is proposed to facilitate the development, it is recognised that it is commercial forestry which would inevitably be harvested. Given that context, the proposed extent of tree felling is not considered contrary to the above policy provision.

Landscape Character
Landscape character includes landscape character areas and the landscape value assigned to each of those distinct areas, and also includes protected views and scenic route. Policy objective NH 10.25 is of relevance in respect of landscape character considerations:

- **NH 10.25:** Minimise visual impacts on areas categorised within the County *Roscommon Landscape Character Assessment* including "moderate value"," high value", "very high value" and with special emphasis on areas classified as "exceptional value" and where deemed necessary, require the use of Visual Impact Assessment where proposed development may have significant effect on such designated areas.

The extent of compliance of the proposed development with this policy objective will be discussed in further detail in a later section of this report.

Development Management
In addition to policy objectives relating to specific topic areas, all development proposals are required to comply with relevant development management standards set out in Volume I, Chapter 12 of the County Development Plan. The following sets out a number of items of relevance in the context of the subject windfarm proposal.

Section 12.4 Development Contributions: This details the requirement, through condition in the event of the granting of planning permission, for the payment of development contributions in accordance with the Development Contribution Scheme for the county, which has been prepared in accordance with Section 48 of the Planning and Development Act 2000 (as amended). At the present time, the *Development Contribution Scheme 2014 (as amended 2020)* is in effect. As set out in Table 5 of the Scheme, wind farm developments warrant a development contribution of €6,000 per MW of capacity. In

the case of the current proposal, which has a predicted output of approximately 62.7MW, this would require a development contribution of €376,200.

Section 12.5 Overarching Planning Principles: In order to assess the potential impacts of a proposed development, the need for specialist assessments is highlighted in this section, including where warranted a Natura Impact Assessment to inform the Appropriate Assessment process, Environmental Impact Assessment Report, Archaeological Assessment, Landscape Appraisal and Visual Impact Assessment and Ecological Assessment.

In the context of the above requirement, it has already been acknowledged in this report that sufficient detail has been provided in the submitted documentation on the professional qualifications and credentials of the parties who undertook specialist assessments. It is reasonable to conclude that they have were appropriately qualified to undertake same.

6.3.2 Renewable Energy Strategy (RES)

As already detailed, the *Renewable Energy Strategy* forms part of the adopted *Roscommon County Development Plan 2022-2028.* As such it should be read in conjunction with the policy position already outlined above. The twelve strategic aims set out in Section 2.5 of the RES are also incorporated as part of the policy set out in Volume I of the Plan.

Section 4 of the RES examines 'Renewable Energy Resources and Potential in Roscommon' and discusses a range of renewable energy technologies. Wind energy is recognised in Section 4.6 as being one of the most developed forms of renewable energy, currently offering the greatest potential for large scale renewable energy development. The advantages of wind energy are recognised, including the fact that at operational stage, windfarms produce virtually no air emissions and any carbon energy associated with the project construction stage is offset by the energy generated from turbine operation within a matter of months. Balanced against the benefits is a recognition of potential perceived negative impacts, including in relation to visual impact, residential amenity, and impacts on natural heritage.

Section 6 of the RES focuses on 'Locations for Renewable Energy.' The identification of areas suitable for particular forms of wind energy has been informed by consideration of the *Landscape Character Assessment* which also form part of the County Development Plan, as well as by the use of the recently developed Local Authority Renewable Energy Strategy (LARES) web-tool. Utilising the foregoing, areas within County Roscommon have been designated into three categories for wind energy potential – 'Most Favoured', 'Less Favoured' and 'Not Favoured.' The county map contained in Figure 7 of the RES identifies the category applicable to each area of the county. CAEE 8.5 in Volume I of the County Development Plan gives policy expression to this.

The proposed development site is within an area identified as 'Less Favoured' and closely bordering an area which is categorised as 'Not Favoured.'

As detailed in Section 6.5 of the *Renewable Energy Strategy,* "*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" in Less Favoured Areas. It is evident as per policy objective CAEE 8.5 of the *County Development Plan* that wind energy proposals are in the first instance required to locate in areas designated as 'Most Favoured.' Despite the extensive detail presented in the submitted application documentation on various specialist examinations and studies undertaken to support the proposal for a wind energy development in the applicants chosen location, there is limited justification for the selection of this 'Less Favoured' area rather than a 'Most Favoured' area. Whilst Chapter 3 of the EIAR discusses 'alternatives', no specific details have been provided on actual locations considered and there is no clear evidence presented as to why the proposal could not be progressed in an area identified as 'Most Favoured' for the purposes of wind energy development. As evidenced from Roscommon County Council's record of a pre-planning consultation in June 2025 (Appendix 1), this was an identified issue of concern for the Local Authority and to a large extent has not been satisfactorily addressed in the submitted proposal.

6.3.3 Landscape Character Assessment (LCA)

Similar to the *Renewable Energy Strategy* the *Landscape Character Assessment* is one of the components of the current County Development Plan. The LCA identifies specific landscape character types and landscape character areas and assigns one of four landscape values to the latter. It is recognised in Section 2.2 of the LCA that "the landscape of the county offers many opportunities for sustainable development" with renewable energy projects being considered feasible in various locations and with "some areas being conducive to commercial scale wind energy projects due to landform and wind speeds."

The main area of the proposed site i.e. the turbine location, is in Landscape Character Area 20 – the Breedoge Bogland Basin, which is classified as being of 'Moderate' landscape value. As per the *Landscape Character Assessment,* the "principle feature of interest is the vast area of bogland in the centre of the LCA, which has intrinsic ecological qualities." As set out in Section 1.2.5 of the LCA, a classification of 'Moderate Value' is the lowest of the four classifications and is assigned to landscape character areas that tend to be less sensitive and are therefore more tolerant of change.

Significant emphasis in the planning application is placed on the 'Moderate' landscape value assigned to the area in which the site is primarily located. It is not considered that sufficient recognition has been given or analysis undertaken of the proximity of the development to and impact on the proximate Landscape Character Area 28 – Tulsk and Rathcroghan Plateau. This landscape character area is one of only two countywide which are classified as being of 'Exceptional Value.' Whilst the *Landscape Character Assessment* references the national significance of this area, it is of increasing relevance that the Rathcroghan Archaeological Complex forms part of the Royal Sites of Ireland UNESCO World Heritage bid and may become internationally renowned. It is accepted that the Landscape and Visual Impact Assessment submitted with the current planning application acknowledges that the Rathcroghan complex is a 'key cultural landmark' and a 'tentative World Heritage Site.' Notwithstanding this, as discussed earlier in Section 6.1.4 of this report, the conclusions reached in respect of landscape and visual impact, in which level of landscape effect is deemed 'Moderate-Slight' is not considered an accurate reflection of the potential impact on a landscape character area of 'Exceptional Value.'

7.0 Consultations

7.1 Roscommon County Council Roads Department

The development proposal has been considered by the Roads Department of Roscommon County Council. The full response is contained in Appendix 2 of this report. Concern is expressed in the response from the Roads Department in relation to the long term effect that the proposed works will have on the local road network included in the grid connection route. The report highlights that this will place significant constraints on the Council with respect to all future works along the proposed route.

In addition to the above, the following key considerations have been raised, which are of relevance in the assessment of the development proposal and also in the potential undertaking of works in the event of the granting of planning permission:

- Joint bay locations are important as they are considered to potentially have a major impact on the road network during and after construction. Potential locations for and agreed depths of joint bays have been discussed at length with the applicant. Roscommon County Council require all joint bays to be located off the public road unless absolutely necessary following all alternative locations being exhausted.

- If the application is successful, prior to commencement of the project Roscommon County Council considers it essential that the applicant engage with the Council and as part of the process provide a survey of the cabling route along the public roads which will clearly show the road cross sections and clearly identify the cable location on all roads. Cross sections are also required at all joint bay locations.

- Roscommon County Council will require the applicant to carry out full width reinstatement on all public roads where cabling is within the carriageway.

- Details of the wearing course permanent reinstatement are to be agreed with the roads department and shall be shown on a separate set of drawings with appropriate background mapping for consideration. This includes all surfacing works required at new entry/exit points accessing a public road.

- A road opening licence will be required from Roscommon County council for all works within the public road space.

- In the event that in the future the proposed infrastructure is required to be relocated to accommodate future road development or improvements along the route, the full costs and responsibility of such relocation shall be borne by the statutory undertaker in charge of the cable and ancillary infrastructure.

Several other parameters have also been set out in the consultation response from the Roads Department which would be applicable to the development of the grid connection, the turbine delivery route and the materials delivery route in the event of the granting of planning permission.

7.2 Roscommon County Council Heritage Officer

The consultation response from Roscommon County Council's Heritage Officer is contained in full in Appendix 2. As already referenced in the assessment of the proposal in the context of RCDP policy objective BH 9.14, the Heritage Officer has expressed concern at the assertions of the submitted Heritage Impact Assessment 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 proposed development 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. The Heritage Officer details on-going substantial conservation works and expresses concern at the potential high magnitude of impact and change on the historic site and the available vista from the Friary.

8.0 Conclusion and Recommendation

At a strategic level, Roscommon County Council supports wind energy development. Renewable energy projects of scale in County Roscommon are recognised as providing an opportunity to reduce dependency on non-renewable resources and contribute to achieving a greater degree of energy security than is presently the case. However, that broad policy support does not readily render all renewable energy proposals acceptable. The development proposal presented, whilst comprehensive in references to policy detail, is lacking in sufficient demonstration of how the proposed development complies with policy provision, particularly local level policy such as the chosen location of the site in an area that is 'Less Favoured' for wind energy development. In the main, the policy compliance position is heavily focused on emphasising the overall contribution that this wind energy development would make at a strategic level towards climate targets and does not sufficiently engage with local level considerations and certain site specific factors. This gives rise to two primary concerns, namely:

- Insufficient justification for the proposed undertaking of the development 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 Roscommon County Council to consider that the development has been demonstrated to be in accordance with the *Renewable Energy Strategy* and policy objective CAEE 8.5 of the *County Development Plan*;

- An apparent underestimation of the effect of the proposed development 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.

Having regard to all of the foregoing considerations, it is not considered that the proposed wind energy development and associated grid connection can be endorsed by Roscommon County Council on the basis of the detail, analysis and justifications presented to date.

It is recommended to the Elected Members that this report and the concerns detailed herein, be endorsed as representing Roscommon County Council's consultation response, for issue to An Coimisiún Pleanála,

_____

APPENDIX 1

Roscommon County Council

Pre-Planning Record

Record of Pre-Planning Consultation – Section 247 of the Planning Act

Planner (name and position) : Mary Grier , Senior Planner

Pre-Planning Ref. No. : PP 4734 (major pre planning discussion)

Site visit undertaken : Yes [ ] No [X]

Date of meeting : 11th June 2025

(MS Teams discussion)

Attendees :	External Applicants • Niall Galvin (Enerco) • William O' Connor (Enerco) Agents (Jennings O'Donovan): • Sarah Moore • Breena Coyle • Kathlyn Feeney RCC Internal Mary Grier, Senior Planner Alan O'Connell, Senior Executive Planner Greg O'Donnell, SEO, Environment Ivor Kilcline, Boyle Municipal District Co-Ordinator Caroline Nally, Executive Engineer, Roads
Interest in land	Intend to lease land
Applicant contact details	Refer to pre planning request form for contact details.
Site location	Townlands of Cloonshanville, Leggatinty, Ballynahowna, Ballaghcullia, Drummin Loughbally, Carrigeenynaghtan. Carrigeen, Tonaknick, Carrigeenacreeha. Brackloon, Peak, Cloonkerin, Edenan and Kinclare. Gortnacloy, Tartan, Carrigeen. Runnacocka, and Scor Beg. Co. Roscommon. The EIAR Boundary for the grid connection includes the townlands of Edenan and Kinclare, Kinclare, Kilnamryall, Ballyroddy, Usmacool, Ca ran, Caranlea, Lisgrave, Carrowntogher, Cartroncarrowntogher, Cartroncaran, Skeanavart, Carrowncaran, Erriblagh, Rathardeagher, Ballysundrivan, Ballyhollaghan, Ryefield or Runnateggal, Corbally West, Moheedian, Corbally Middle, Corbally East. Dacklin. Carrowreagh, Killummod, Ballyculleen, Ballindrehid, Lodge, Cartron and Culleenatreen or Flagford.

Development proposal	"The construction of approximately 14 no. wind turbines with a combined estimated generating capacity of greater than S0MW. The turbines will have an overall blade tip height of up to 185 m, a rotor diameter of 163 m, and a hub height of 103.5 m. The proposal will also include planning permission for the construction a ll0kV substation and an underground ll0kV grid connection to Flagford 220kV Substation, Co. Roscommon."
Supporting documentation received	- Site location map - Site layout plan - Landowner letters of consent - General explanatory summary of proposal.
Planning Policy	**National and Regional planning policy considerations :** • ***National Planning Framework – First Revision***: o National Strategic Outcome 8 – Transition to a Low Carbon and Climate Resilient Society ***Roscommon County Development Plan 2022-2028*** **policy considerations**: - Chapter 5 – Rural Development and Natural Resources ▪ Section 5.7 Renewable Energy - Chapter 7 – Infrastructure, Transport and Communications • Section 7.4 Road Transportation and Movement - Chapter 8 – Climate Action, Energy and Environment - Chapter 9 – Built Heritage - Chapter 10 -Natural Heritage • *County Roscommon Renewable Energy Strategy (RES)* o Chapter 4 – Renewable Energy Resources and Potential in Roscommon ▪ Section 4.6 Wind Energy o Chapter 6 – Locations for Renewable Energy • Section 6.5 Wind Energy • *Landscape Character Assessment for County Roscommon* (LCA)
Discussion on site specific considerations	The agents gave a presentation at the beginning of the discussion. They provided some background on the parent company, Enerco. They also advised that the proposal has been amended since the submission of the pre-planning request, reducing from 14 proposed wind turbines to 12, with 7MW output and a blade tip height of 185 metres. They also advised of the following: - Baseline studies completed; - Community Liaison Officer appointed in January 2025 who was engaging with the community in door to door consultations;

- Completion of their first discussion with An Bord Pleanala in relation to whether or not the proposal will be determined to be a Strategic Infrastructure Development;
- Scoping requests had been issued;
- Recognition of the Rathcroghan Archaeological Complex being 5km to the south and Landscape Visual Assessment being prepared to include 25 viewpoints;
- Clarification that the grid connection is all proposed within the public road.

Matters outlined by RCC officials:

<u>Planning</u>

- Policy support for renewable energy development but emphasis on the fact that this was subject to any proposed location being appropriate and that wind energy projects in the first instance are directed to identified 'Most Favoured' areas. The applicants were asked to explain the rationale for the site selection given that it is in a 'Less Favoured' area. RCC does not readily consider that it is an appropriate location for the proposed development having regard to the wind energy strategy, proximity to Rathcroghan and also the impact of the proposed extensive grid connection on the road network;
- Any application would be required to set out the rationale for the proposed siting of the turbines in a 'Less Favoured' area and to detail the alternative locations considered and why discounted. This should be appropriately dealt with in an EIAR;
- Potential impacts on designated sites were discussed, with the proximate Bellanagare Bog SPA being highlighted in particular by RCC, and reference to the Greenland White-fronted Goose being one of its qualifying interests. Avian surveys required in any application;
- Concern expressed regarding visual impacts. Noted that the main site (turbines) was close to two Landscape Character Areas classified in the LCA as being of 'Exceptional Value';
- Concerns expressed in relation to potential impact on the Rathcroghan Archaeological Complex. Potential intervisibility and potential future adverse impacts on Rathcroghan which could impact its reputation and future heritage status;
- Queries raised regarding shadow flicker assessment – the applicants / agent confirmed that this will be considered in the context of the 2006 Wind Energy Guidelines.

<u>Roads</u>

- Significant concern expressed by RCC in relation to the potential impacts on the road network, particularly the network of local (bog) roads which would be impacted. RCC noted the extent of the proposed grid connection on the local road network, being approximately 22km;

	- The rationale for proposing a grid connection to the Flagford substation, as opposed to a substation in closer proximity was queried. Details of alternatives considered and why discounted in respect of the grid connection would also be expected in any application; - Discussion on the constructed nature of some of the 'bog roads' that would be impacted by the proposal – some have timber foundations in excess of 50 years old. Repairs and reinstatement would be extremely costly; - Full scale reinstatement required of all roads impacted; - The Boyle MD Co-Ordinator and Act. SEE from Roads agreed to discuss the roads issues in further detail with the Senior Engineer in Roads following his return from leave and indicated being agreeable to follow up discussions directly with the applicants in relation to roads matters. <u>Environment and Climate Action</u> - Renewable energy proposals are positive in the context of climate action, but acceptability is subject to all other matters being satisfactorily addressed.
Supporting information required in a planning application	- Plans and drawings; - Landowner letters of consent.
EIAR requirement	Yes [x] No [ ] Further assessment required [ ] Natura Impact Statement also expected to be required.
RCC pre-planning conclusion	Policy support at national and local level for renewable energy projects. However, RCC strongly cautioned that on the basis of the details presented to date, there were significant concerns and in the event of being consulted in the context of a SID application to ABP, RCC may not be in a position to endorse the proposal. Unresolved concerns at the end of the meeting about the selected location for the turbines in a designated 'Less Favoured' area for wind energy development and significant concerns associated with the proposed grid connection on the public road network, particularly as it remained unclear as to whether or not other alternatives were available or had been considered.

Signed : Mary Frier _____
Senior Planner

APPENDIX 2

Roscommon County Council

Internal Consultation Responses

- **Roads Department**
- **Heritage Office**

Roads Section Planning Report

Planning Ref. No:	**Strategic Infrastructure Development proposal (Carrigeen Renewable Energy Development)**
Applicant:	Carraigin Power Ltd
Proposed Development:	Strategic Infrastructure Development under Section 37E of The Planning and Development Act 2000 (As Amended) for a proposed RED III Renewable Energy Development. Proposed Carrigeen Renewable Energy Development, for Carraigin Power Ltd, in the townlands of Leggatinty, Carrigeenacreeha, Ballynahowna, Caranlea, Killummod, Culleenatreen or Flagford, Cartroncaran, Lodge, Carrigeen, Ballaghcullia, Ballindrehid, Corbally East, Peak, Gortnacloy, Tonaknick, Ballysundrivan, Caran, Cloonkerin, Carrowntogher, Corbally Middle, Ballyroddy, Cloonshanville, Skeanavart, Dacklin, Kinclare, Erriblagh, Lisgarve, Loughbally, Rathardeagher, Carrigeenynaghtan, Brackloon, Edenan and Kinclare, Kilnamryall, Corbally West, Cartroncarrarowntogher, Carrowncaran. County Roscommon.
Date:	11/05/2026
Roads affected:	L1217, L1216, L5650, N61, L6019, L1400, L1403, L6001, L6000, R368, L1034

Recommendations

Roscommon County Council roads department would have concerns about the long term effect that the proposed works will have on the local road network included in the route. Significant constraints will be placed on RCC with respect to all future works along the proposed route. To ensure roads resilience of the proposed project over the entire route please see comments and recommendations below.

1. Joint bay locations are important as they are considered to potentially have a major impact on the road network during and after construction. Potential locations for and agreed depths of joint bays have been discussed at length with the applicant. Roscommon County Council require all joint bays to be located off the public road unless absolutely necessary following all alternative locations being exhausted.

2. If the application is successful, prior to commencement of the project Roscommon County Council considers it essential that the applicant engage with the council and as part of the process provide a survey of the cabling route along the public roads which will clearly show the road cross sections and clearly identify the cable location on all roads. Cross sections are also required at all joint bay locations.

3. Roscommon County Council will require the applicant to carry out full width reinstatement on all public roads where cabling is within the carriageway.

4. Details of the wearing course permanent reinstatement are to be agreed with the roads department and shall be shown on a separate set of drawings with appropriate background mapping for consideration. This includes all surfacing works required at new entry/exit points accessing a public road.

5. A road opening licence will be required from Roscommon County council for all works within the public road space.

6. In the event that in the future the proposed infrastructure is required to be relocated to accommodate future road development or improvements along the route, the full costs and responsibility of such relocation shall be borne by the statutory undertaker in charge of the cable and ancillary infrastructure.

General

- A Construction Management Plan shall be submitted to RCC. Contents to include implementation of planning conditions and EIS requirements.
- RCC to be advised of details of PSDP, PSCS and contractors.
- A road opening licence will be required from RCC for all works including ground investigation works. Traffic management, road closures etc to be agreed with RCC prior to any work dbeing programmed.
- Appropriate Insurances to be demonstrated by the developer
- A Performance bond will be required to cover the full costs of all potential reinstatement works that may be required by Roscommon County Council
- Developer to consult with An Garda Siochana, emergency services and bus operators in relation to each stage of the works
- Liaison with the public, residents, businesses, schools & elected representatives along all the affected routes.

Cable Route Conditions:

- Details of cable installation to be submitted to RCC in advance of commencement of works. Details to include works programme, construction details, cross-sections for each road showing location of trench in road and any existing services.
- Where road closures are required, an application must be submitted to RCC at least 8 weeks in advance.
- No road closure permitted on a regional road. At a minimum ingle lane traffic to be maintained at all times.
- Where road works speed limits are required, an application shall be submitted to RCC at least 8 weeks in advance. Signs to be erected by the developer.

- Diversion routes to be maintained whilst any diversion is in place.
- Traffic management plans to be submitted for each stage of the works.
- Pre-condition survey of cable routes, consisting of a video survey of the full route and photographs at every entrance and boundary structure to be carried out and a copy submitted to RCC. Any damage caused to the road or adjacent properties shall be repaired to its previous condition, to the satisfaction of RCC and/or landowner.
- Pre-condition structural surveys on adjacent properties shall be carried out where necessary.
- All works shall be in accordance with the TII Specification for Road Works unless otherwise specified.
- Reinstatement of the trench in local and regional roads shall be in accordance with the latest version of "Guidelines for the Opening, Backfilling and Reinstatement of Trenches in Public Roads" (The Purple Book), except where noted otherwise.
- After temporary reinstatement of the trench:
    - A full width overlay shall be provided on all Local & Regional roads.
- All permanent restoration shall be agreed with RCC.
- Ironworks shall be raised & reset as necessary and road markings and road studs reinstated.
- All existing watercourse crossings/bridges shall be identified and detailed designs submitted to indicate how these will be crossed.
- For clarity RCC require that the cable route is placed under all water crossings, structures where the minimum depth to the top of the cable as specified by RCC is being compromised.
- All existing surface water drainage affected by the works to be surveyed & redesigned if required in agreement with RCC.
- The developer shall allow in his programme for accommodation of local events, such as charity walks and cycles.
- A defects liability period of 2 years shall apply. This shall commence when written notification has been given that the permanent reinstatement/overlay has been completed.

<u>Turbine Delivery Routes</u>

- Detailed programme of deliveries to be submitted to RCC in advance of commencement of deliveries. Details to include dates and times, number of loads, weights, road closure and diversion routes, support vehicles, etc.
- Identification of landowners at all nodes and entry/exit points requiring temporary or permanent works. If RCC consider that the land used for any temporary or permanent works would be beneficial for the improvement of the existing road, then the developer shall carry out a design for the improvement and implement same.
- Pre-condition survey of delivery routes, consisting of a video survey and photographs, and a detailed survey of all node locations to be carried out and a copy submitted to RCC. Survey at nodes to include drainage, landscaping, surfacing, boundary fences/hedges/gates, signage.
- Where RCC consider a proposed delivery route is not in a suitable condition, the developer shall upgrade the road or junction in advance of delivery operations.
- Any damage caused to the road shall be repaired to its previous condition, to the satisfaction of RCC.
- Developer to consult with all service providers (including Irish Water) in relation to turbine delivery routes. RCC to be advised of any alterations required.
- Developer to consult with An Garda Siochana and emergency services in relation to the turbine deliveries.
- Design and construction details for temporary modifications at node points to be submitted, for approval by RCC. Details to include arrangements for both delivery phases and road open

phases. Road safety audits in accordance with DMRB HD 19/12 to be carried out, if appropriate. RCC may request All EIS requirements to be achieved.

- Abnormal load permits will be required.
- Any alterations affecting the width of the existing road shall be reinstated to the original width, unless otherwise agreed with RCC. Where roads are widened, the specification shall be that of the existing road at a minimum.
- An emergency plan shall be submitted.
- Liaison with local groups such as Tidy Towns, etc.
- Liaison with the TII for transportation on the motorway.
- All areas affected by the works shall be fully reinstated to their original condition. Where landscaping has been removed, similar plants of similar maturity shall be used for reinstatement. Where it is not possible to replace mature trees, younger trees plus additional landscaping shall be provided in lieu to enhance the area. Where hedging is removed and new hedging planted as reinstatement, suitable fencing shall be provided for the protection of the hedge, and maintenance shall be provided until the hedge is established. Where grass is replaced with new seeding, the grass shall be maintained until it is established. Full reinstatement shall be completed within one month of the final delivery.

Materials Delivery Routes:

- Detailed programme of deliveries to be submitted to RCC for prior approval in advance of commencement of deliveries. Details to include number of movements per day, weights.
- Traffic management plan to be submitted for haulage of materials, including at entry/exit points.
- Pre-condition survey of delivery routes, consisting of a video survey and photographs, a Road Condition Survey, and an FWD Survey where required, to be carried out and a copy submitted to RCC.
- Where RCC consider a proposed haul route is not in a suitable condition, the developer shall upgrade the road or junction in advance of haulage operations.
- Any defects that appear during the haulage period shall be rectified by the developer.
- Any damage caused to the road shall be repaired to its previous condition, to the satisfaction of RCC.
- Public roads shall be kept free of mud, dust, spillages and debris. Any necessary measures shall be put in place at site entry/exit points.

John Freeman

Signed: _____ **Date:** 11/05/2026

John Freeman
Senior Executive Engineer

Strategic Infrastructure Development, Carraigin Power Ltd

An Coimisiún Pleanála - Case reference: PAX20.324167

Proposed Carrigeen Renewable Energy Development including 11 wind turbines and other associated works

Heritage Office Submission 06/05/2026

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

As the current statement of OUV is in its tentative listing format, it is not possible at this point to conclude the following point, on which the main weight of the Heritage Impact Assessment's argument lies:

'*the limited role that the wider landscape of Rathcroghan plays in supporting OUV*' (Appendix 15.1 Section 5.1.13).

As such it would be appropriate to apply the precautionary principle so as not to inadvertently set a negative precedent for development which would have such a significant visual impact on the views out from the main elevated monuments in the Rathcroghan landscape, as well as their supporting setting.

Under the circumstances, it would be prudent to undertake an independent objective review through appropriate and accredited UNESCO World Heritage independent specialists. This independent review should consider the degree of impact on the attributes, which may be considered to be 'Some' as opposed to 'Negligible' based on the ICOMOS guidelines interpretation notes.

2. **Cloonshanville Friary**

A '*Conservation Management Plan for Cloonshanville Abbey, Co. Roscommon*' prepared by Blackwood Associates Architects and Building Conservation Consultants in 2023 (https://www.roscommoncoco.ie/coco/en/burialgrounds/images/cloonshanville-abbey-conservation-management-plan-2023/cloonshanville-abbey-conservation%20management%20plan%20-2023.pdf) states 'the significance of Cloonshanville Friary lies not only in the form, features and fabric of the ruin, but also in its relationship to the network of foundations of the Dominican Order through the west of Ireland and with the Dominican Order in Ireland, as well as its role within the local community. It has been a place of burial for many generations' (Section 1.1).

Substantial conservation works have been ongoing at Cloonshanville Friary for the past two years, with a third phase to be carried out in 2027. These works, when complete, will support enhanced visitor access, presentation and interpretation of this important site. The heritage office has misgivings that the proposed changes may not be modest in extent and scale and could instead be of high magnitude; that the changes will intrude into a significant proportion or important part of the available vista from Cloonshanville Friary. This may create a considerable degree of visual disorder or

disharmony and could appreciably reduce the visual amenity of the scene negatively impacting on the archaeological and cultural significance of this important site.

ROSCOMMON COUNTY COUNCIL

Strategic Infrastructure Development Proposal

S37E of Planning and Development Act 2000 (as amended)

Proposed Carrigeen Renewable Energy Development

Resolutions Agreed at Plenary Meeting held on Monday 25th May 2026

1. On the **PROPOSAL** of Cllr. Keogh
   SECONDED by Cllr. Byrne
   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.

2. On the **PROPOSAL** of Cllr. Callaghan
   SECONDED by Cllr. Kelly
   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.

3. On the **PROPOSAL** of Cllr. Byrne
   SECONDED by Cllr. Callaghan
   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.

These resolutions are to be attached as addendum to the Chief Executive's Report.

Signed Karen Hanley Date 29/05/2026

Karen Hanley
Meetings Administrator